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October 22, 2007

*Delivered via U.S. Mail and Facsimile to 530-621-5297*

Eldorado National Forest  
Forest Supervisor Ramiro Villalvazo  
Eldorado National Forest Travel Management DEIS  
100 Forni Road,  
Placerville, CA 95667

**RE: Comments to Eldorado National Forest Public Wheeled Motorized Travel Management Draft Environmental Impact Statement**

Dear Mr. Villalvazo:

Please accept the following comments to the Eldorado National Forest Public Wheeled Motorized Travel Management Draft Environmental Impact Statement (“DEIS”). These comments are submitted on behalf of our clients, the BlueRibbon Coalition, the California Association of 4 Wheel Drive Clubs, the California Enduro Riders Association, American Motorcyclist Association District 36 and the California Off Road Vehicle Association (collectively, the “Recreational Groups”). Individual and/or organizational members of the Recreational Groups may submit additional comments, which should be considered distinct and independent from these comments and the agency should independently analyze and respond to each such comment. Our comments are designed to support and amplify the comments from the Recreational Groups, their members and enthusiasts. We are aware of the controversial nature of travel planning, in general and on the Eldorado. The purpose of our comments is to outline the proper legal context and analysis to be used in interpreting route-specific comments. Any communications regarding these comments should be directed to Paul A. Turcke at the contact information listed above.

BlueRibbon is an Idaho non-profit corporation with over 10,000 individual, business, and organizational members representing approximately 600,000 individuals nationwide. BlueRibbon members use motorized and non-motorized means, including off-highway vehicles, snowmobiles, horses, mountain bikes, and hiking, to access state and federally-managed lands

thought the United States, including the Eldorado National Forest (“Eldorado”). BlueRibbon members have concrete plans to enjoy such future access to the Eldorado.

BlueRibbon has been actively involved in all administrative processes and litigation referenced in the DEIS. While we appreciate the effort reflected in the DEIS, there are serious deficiencies in the DEIS which can hopefully be remedied. We look forward to continuing our involvement in further planning and litigation that will apparently continue to surround management of motorized recreation in the Eldorado National Forest.

We note the existence of and hereby incorporate by reference two letters we have presented to the Eldorado addressing the current travel planning process. Specifically, we provided letters dated August 2, 2007 and September 6, 2007. We have not yet received a response to either letter from the Eldorado. Again, we reiterate and incorporate by reference the comments and legal analysis presented in those letters and ask that you formally respond to them in the FEIS.

“Motorized recreation is a legitimate use” of the National Forests.<sup>1</sup> “The number of OHV users in the United States has climbed tenfold in the past 32 years, from approximately 5 million in 1972 to 51 million in 2004.”<sup>2</sup> The Forest Service needs to provide for this increase in demand by properly maintaining the existing route system and looking for areas to construct new, environmentally compatible routes.

Then-Chief Dale Bosworth stated in a News Release for the Travel Management Rule, “[I]and Managers will use the new rule to continue to work with motorized sports enthusiasts, conservations, state and local officials and others to provide responsible motorized recreational experiences in national forests and grasslands for the long run.”<sup>3</sup> “A managed system of roads, trails and area designated for motor vehicle use will better protect natural and cultural resources, address use conflicts, and secure sustainable opportunities for public enjoyment of national forests and grasslands.”<sup>4</sup> In fact, “it is Forest Service Policy to provide to diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability.”<sup>5</sup> The Forest Service should be planning for a managed system, and working with all groups, including OHV enthusiasts, in order to comply with not only the agency’s own directives and the Travel Management Rule, but the policies behind the Rule.

At the outset, we wish to emphasize that this process affords an unprecedented opportunity to conduct effective travel management planning. With the promulgation of the Travel Management Rule there is a unique emphasis on travel management and, at least in theory, a dedication of human and financial resources to travel planning efforts. As a practical

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<sup>1</sup> Travel Management Rule Final Communication Plan, November 2, 2005, p.5.

<sup>2</sup> *Id.*

<sup>3</sup> USDA Forest Service, News Releases, “USDA Releases Final Rule for Motorized Recreation in National Forests & Grasslands,” dated November 2, 2005.

<sup>4</sup> Travel Management Rule Final Communication Plan, November 2, 2005, p.5.

<sup>5</sup> Forest Service Manual 2353.03(2).