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February 7, 2007

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

Attention: Tony Scardina

Re: Lover's Leap Motorcycle Trail 17E12

Dear Supervisor Villalvazo:

The Access Fund recently learned that the Eldorado National Forest is engaged in a planning process that may lead to the formal designation of an off-road motorcycle trail to the summit of Lover's Leap, one of California's most popular climbing areas. On behalf of the national and international climbing community, we strongly urge you to preserve Lover's Leap for non-motorized recreation.

We believe the formal designation of a motorcycle trail to the summit of Lover's Leap would seriously degrade the quality of the climbing experience at Lover's Leap and the breath-taking experience the summit offers to climbers and hikers. Designation of a motorized trail at this location, combined with the de-designation of other trails, would lead to greatly increased motorized use of this trail in the future, resulting in potentially inappropriate noise impacts, resource degradation and user conflicts, and ultimately the loss of a superb outdoor experience. Inspection of the trail indicated that it lacks any unique qualities that would warrant its preservation for motorized use other than the experience of the summit, and that is a rare prize that should be preserved for those who are willing to get there without negatively impacting the experience of others.

The Access Fund is the only national advocacy organization whose mission is to keep climbing areas open and conserve the climbing environment. We are a Section 501(c)3 non-profit organization supporting and representing the nations 1.6 million climbers, and we are the largest US climbing organization with over 15,000 members and affiliates. The Access Fund promotes the responsible use and sound management of



climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

The Access Fund has been involved at Lover's Leap since the early 1990's, and its members before that as members of the Access Subcommittee of the American Alpine Club. Access Fund members were instrumental in preserving access to the Leap campground from residential development and in providing funding and planning support for the expansion and improvement of the Leap campground, and we remain committed to the maintenance of the Leap as a climbing resource.

Lover's Leap is one of the nation's premier climbing areas and the largest single climbing area in Northern California outside Yosemite National Park. The "Leap" draws day use and weekend climbers from throughout Northern California and is a destination for climbers from other states and other countries. It has a climbing history going back to the 1950's. It is valued by climbers for its clean rock, unique horizontal dikes, near vertical walls, quality moderate routes and natural setting. In his 1976 Tahoe Guide, Royal Robbins states that "With the lone exception of Tahquitz Rock, Lover's Leap has the best selection of concentrated free climbs in California. . . No one cliff even in Yosemite has Lover's Leap's concentration . . . with such quality and variety." In his climbing guidebook to the Leap, Chris McNamara states: "Lover's Leap boasts some of the country's best moderate [level of difficulty] granite. . . . What makes Lover's Leap unique are the criss-crossed dikes, which form juggy meridians at 3 to 10 foot intervals. . . . The myriad rock features offer many options for each crux [most difficult spot on a rope-length pitch] which can help or confuse. . . Crucial Leap skills include stemming [spread feet], long reaches, and discriminating handhold selection. Most crack climbs involve a combination of stemming, face climbing and the occasional straight-in [hand or finger] jam. Most face climbs involve reaches and mantels between dikes. . . . You would be hard-pressed to find a granite cliff that has more large holds."

Of the several hundred routes at the Leap, over 30 top out on the massive wall below the summit. These include two of the most popular routes at the Leap: Travelers Buttress and Corrugation Corner. There is also a hiking trail that reaches the summit from the east. From there, climbers and hikers can look almost straight down seven hundred feet to the South Fork of the American River. They also have an unimpeded view of the glacially-carved canyons of Pyramid Creek and the South Fork and the upper slopes of Pyramid Peak, the highest point in Desolation Wilderness. While the quality of the experience on the summit is reduced somewhat by the noise from Highway 50 below, it is still one of the most breathtaking views available in the Eldorado National Forest outside designated wilderness or the Lake Tahoe basin.

We recently walked the motorcycle trail to the summit and spoke briefly with motorcyclists using the trail. We noted that there were motorcycle tire marks that went to

within 30 feet of the edge of the summit cliff, and that the summit was sufficiently open and bare of vegetation to allow motorcycles considerable room to drive around. We also noted that there was evidence of fairly extensive motorcycle use on the trail, with numerous tire marks, ruts and erosion. This contradicted information provided us by Forest staff that they understood use of the trail was very light—perhaps as little as one bike a week.

Forest Service staff also told us they had been informed by motorcyclists that the trail was very difficult and steep and used only by expert riders. This also did not appear to be the case. The grade of the trail was only moderately steep, and much of it could have been ascended by a strong rider on a non-motorized mountain bike, particularly if the trail were not heavily eroded by motorcycle use. And even an intermediate mountain biker could descend it, especially if it were not heavily eroded by motorcycles. The motorcycle riders we spoke with characterized the difficulty level of the trail as intermediate. This suggests that the trail could receive heavy use if it were one of the trails selected for motorized use.

The trail did not appear to have any special characteristics that would make it particularly challenging or interesting to motorcyclists other than the summit view. There are no particularly challenging obstacles, other than a culvert crossing at a stream, and that is an obstacle only because the trail was poorly constructed over the stream crossing. If the trail were designated for motorcycle use, this obstacle would have to be eliminated because it causes erosion and sedimentation into the stream. Except for the summit at the end, the entire trail is in heavy forest with no views. The trail is very short, and the motorcyclists we spoke with said they can reach the summit in five minutes from the road at the bottom. In short, the experience of ascending this trail on a motorcycle could be created at many other locations in the forest where the use would not conflict with non-motorized recreation, impact sensitive resources, or reduce the quality of a rare summit experience.

We noted that there was evidence of unauthorized ATV use along the entire length of the trail, and that there were no obstacles to prevent ATVs from using the trail, reaching the summit, or exploring down the hiking trail from the summit to the east. We are concerned that if this trail were designated for motorcycle use, it would end up being used illegally by ATVs.

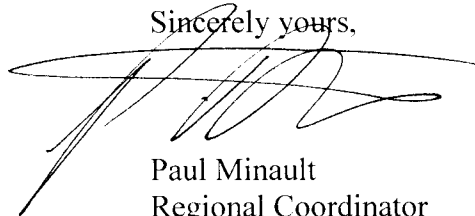
You are currently preparing an environmental document to assess the impacts of designating this and other trails for motorized use. The Access Fund urges you to include in the environmental analysis a noise analysis of the impacts of motorcycle use to the entire "soundscape" of the Lover's Leap trail and other trails, including a map showing the extent of the soundscape of each trail. In the case of the Lover's Leap trail, the soundscape would extend to the summit of Pyramid Peak in Desolation Wilderness and portions of the heavily-used South Fork American and Pyramid Creek watersheds, as well as other portions of Lovers Leap.

Off-road motorcycles are designated in California as Off-Highway Motor Vehicles pursuant to Vehicle Code 38012(b)(1). While California regulates off-road motorcycle noise emissions at the point of sale of a new bike pursuant to Vehicle Code Section 38370, these standards do not apply to the operation of a motorcycle subsequently. After initial sale/purchase, off-road motorcycles may legally emit noise up to 101 decibels (dBA). Vehicle Code Section 38370(h)(1). It is common knowledge, and evident to anyone who stands at the edge of a major California highway for any period of time, that even on-highway motorcycles are subject to no effective noise regulation in California. I have personally confirmed through conversations with several Highway Patrol officers in Sierra foothills offices that they simply do not have the budget or staffing to enforce non-safety regulations such as those related to motorcycle noise. Therefore, any competent noise analysis for the trail designation environmental document must be based on measurements of actual noise emissions from off-road motorcycles and not simply on unenforced and little-observed regulatory requirements.

We would also have appreciated earlier notice of this matter. We understand that you have been engaged in a process of evaluating this and other trails for over a year. Obviously, motorcycle use of the Lover's Leap trail, and particularly the increased use that is certain to follow any formal designation, has the potential to have a major negative impact on the climbing experience at Lover's Leap. Climbers have been the primary users of Lover's Leap for the last fifty years, and we have been in periodic contact with the Placerville Ranger Station regarding various issues concerning management of recreation at the Leap since the early 1990's. It would have been a simple matter and a much appreciated courtesy to contact us or to place a notice on the Leap campground bulletin board informing the climbing community of the route designation process. It always takes some time to mobilize a recreational community around an issue such as this, and we are concerned that with the environmental document coming out shortly, the climbing community will be under-represented in the public involvement in the route designation process as it concerns Lover's Leap.

In sum, we strongly urge you to de-designate the Lover's Leap trail for motorized use and preserve this superb resource for those willing to get there under their own power.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul Minault", written over a horizontal line.

Paul Minault  
Regional Coordinator  
for Northern California

Supervisor Villalvazo

February 7, 2007

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cc:

Jason Keith, The Access Fund

Chris MacNamara

Bill Kershaw

Karen Schambach, Center for Sierra Nevada Conservation

Linda McMillan, The American Alpine Club