



Jonathan Cook-Fisher  
Special Uses Program Manager  
Lake Tahoe Basin Management Unit  
35 College Drive,  
South Lake Tahoe, CA 96150

10/31/2014

Dear Mr. Fisher:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments on the initial scoping for the Homewood Mountain Resort's (HMR's) proposed guided snowcat skiing/snowboarding tours in the Ellis Peak area. We have several concerns regarding the environmental and recreational impacts of the proposed motorized tours in this area. We request the NEPA analysis evaluate the following impacts of this proposed project:

**Air Quality:**

Air pollution from over-snow vehicles (OSV) emissions, including deposition to snow and the impacts on criteria air pollutant levels and human health:

- The Lake Tahoe Air Basin is designated as non-attainment/transitional for ozone and non-attainment for PM10 by the California Air Resources Board<sup>1</sup>
- Off-road vehicles emit significant amounts of NOx and VOCs (precursors to ozone formation)
- Localized emissions of carbon monoxide during the wintertime months may not disperse, creating air pockets that are hazardous to humans

**Greenhouse Gas (GHG) Emissions:**

- The analysis must examine the GHG emissions generated by the proposed project, and assess how these new emissions impact the GHG emissions in the TRPA Regional Transportation Plan/Sustainable Communities Strategy

**Water Quality:**

Water pollution from OSV emissions, including potential individual and cumulative impacts to downstream water bodies (e.g. Lake Louise and Lake Tahoe);

- Impacts of pollution on aquatic environments and wetlands/stream environment zones, including area streams, lakes (e.g. Lake Louise, Ellis Lake, and Lake Tahoe) and the potential to impact the meadows and riparian areas in Blackwood Canyon (see map 16, attached)
- Impacts on the quality and health of the water supply that drains into Madden Creek and provides drinking water for many homes

**Noise and Impacts to Quiet Areas for Non-motorized recreation:**

- Noise pollution, including impacts to nearby areas which the LTBMU's 2014 Forest Plan has listed as backcountry (see Forest Plan map 16, attached), areas set aside for non-motorized use, and areas impacted by the attenuation of noise through topographical features

**Direct and indirect impacts to wildlife:**

- Impacts to wildlife through direct air, water, and noise emissions, and indirect impacts to wildlife habitat from pollution and other impacts of the proposed project;

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<sup>1</sup> <http://www.arb.ca.gov/regact/2013/area13/area13fro.pdf>

**Direct and Indirect Impacts to non-motorized recreation:**

Impacts to snowshoeing and Cross-Country skiing opportunities in nearby areas which may be affected by noise;

**Forest Health and Tree Removal:**

The analysis must assess the extent and options available to minimize tree removal for the OSV's path.

Additionally, it is unclear whether the LTBMU has addressed the management of OSVs in the Tahoe Basin, as required by the United States District Court ruling (March 29, 2013).<sup>2</sup> In addition, although the applicant's current advertisements state these tours will be available this winter,<sup>3</sup> we feel such promises to customers are premature, and we urge the LTBMU to ensure a complete and thorough environmental analysis of this project before any approvals are provided.

Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions.

Sincerely,



Susan Gearhart,  
*President,*  
Friends of the West Shore



Jennifer Quashnick  
*Conservation Consultant,*  
Friends of the West Shore

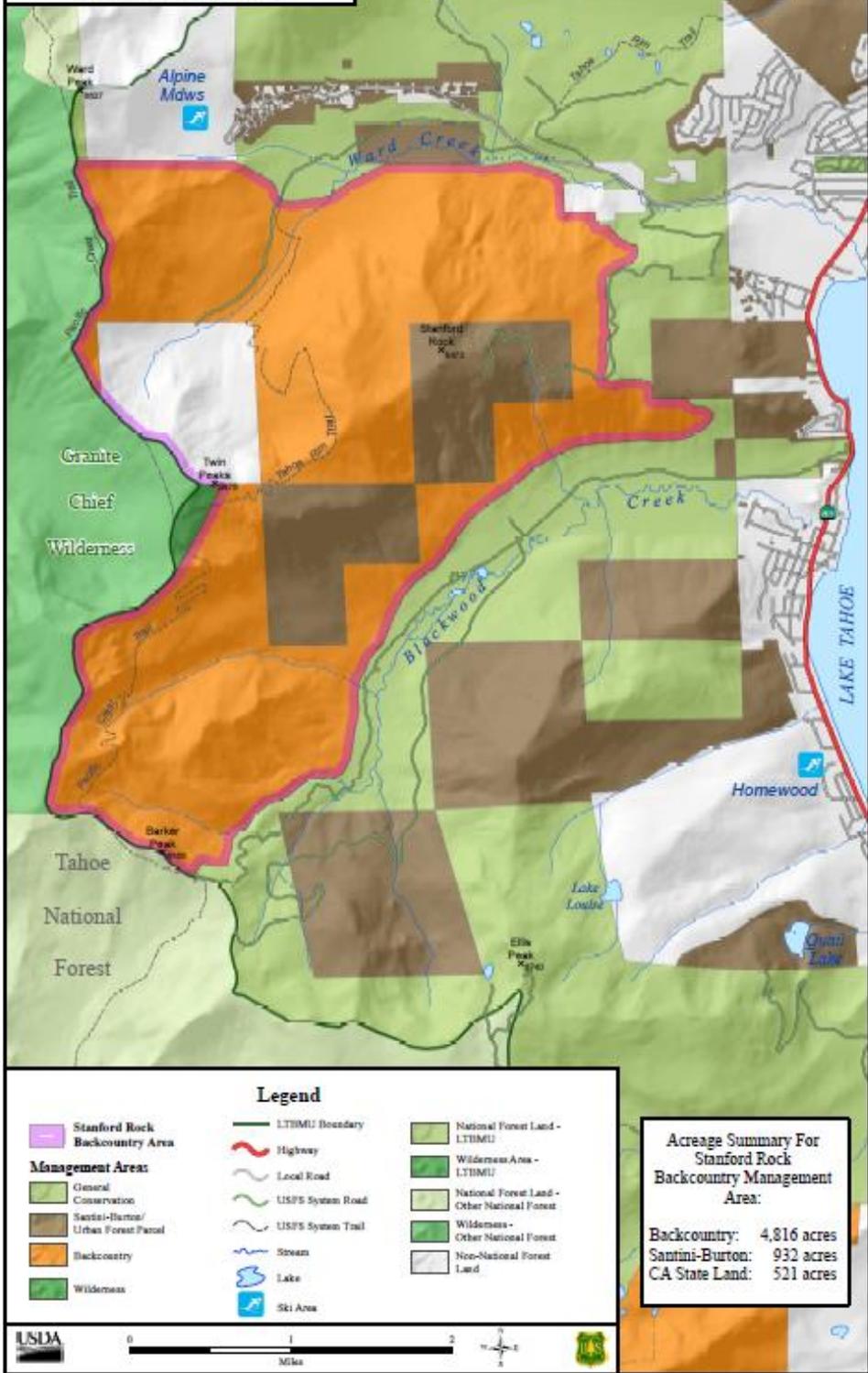
Attachments:                   Stanford Rock Backcountry Management Area, LTBMU 2014  
Map of Alternative E, LTBMU-preferred Forest Plan alternative, 2014

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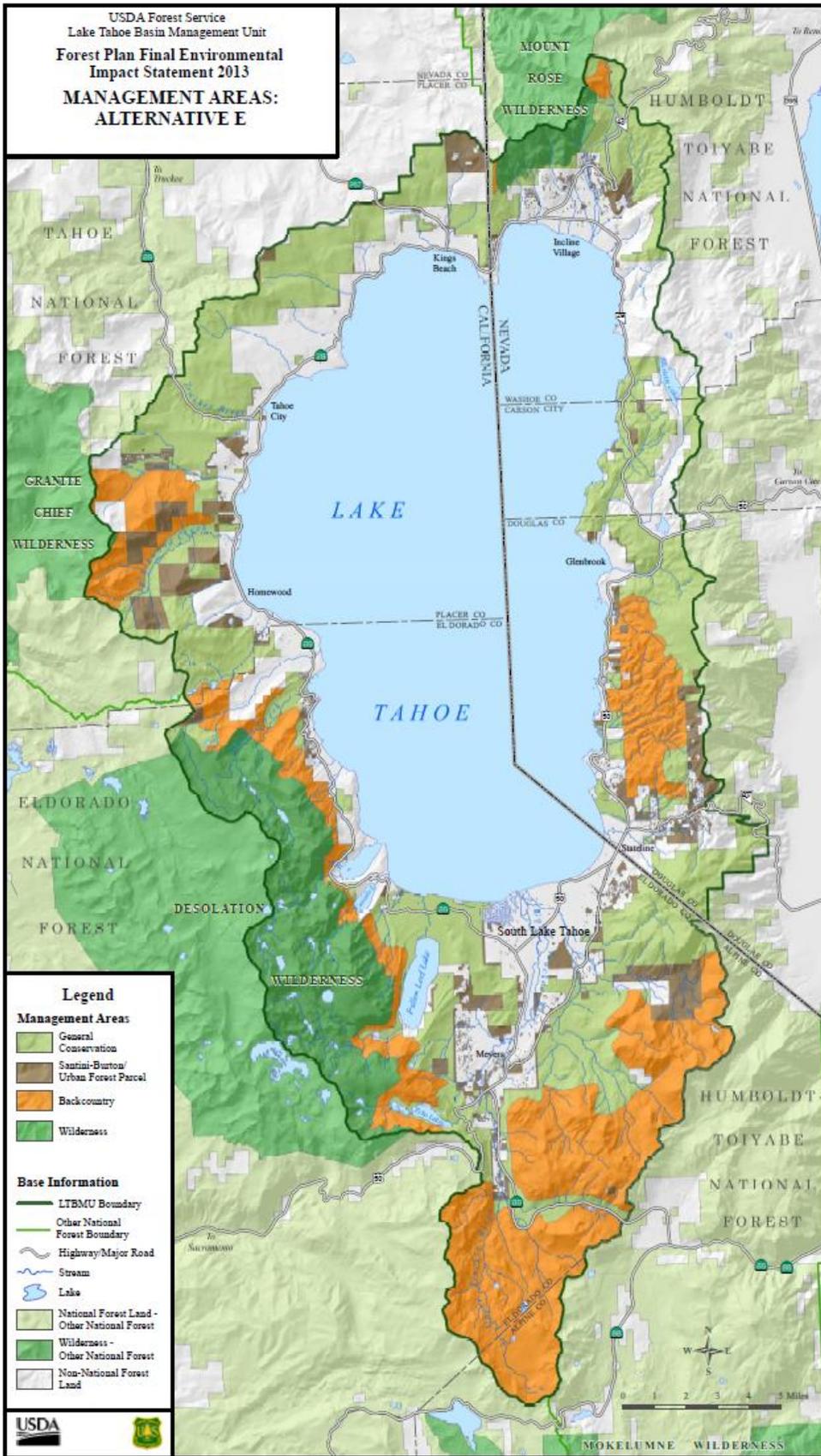
<sup>2</sup> [http://yubanet.com/regional/Snowlands-Network-Appraises-Court-Ruling-Requiring-U-S-Forest-Service-Management-of-Snowmobiles-and-Calls-for-the-National-Forests-in-California-and-Nevada-to-Take-Action\\_printer.php](http://yubanet.com/regional/Snowlands-Network-Appraises-Court-Ruling-Requiring-U-S-Forest-Service-Management-of-Snowmobiles-and-Calls-for-the-National-Forests-in-California-and-Nevada-to-Take-Action_printer.php)

<sup>3</sup> <http://www.skihomewood.com/snowcat>

USDA Forest Service  
 Lake Tahoe Basin Management Unit  
 Forest Plan Final Environmental  
 Impact Statement 2013  
**STANFORD ROCK  
 BACKCOUNTRY  
 MANAGEMENT AREA**



Forest Plan FEIS - Map 16



Forest Plan FEIS - Map 15