



United States
Department of
Agriculture

Forest
Service

Eldorado National Forest

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Route To:

Subject: Mokelumne Wilderness Forest Order

To: Letter to the File

This is a letter to the file documenting the need to renew the restrictions on use of the Mokelumne Wilderness Area as described in the proposed Restricted Use Mokelumne Wilderness Area Order that includes portions of the Eldorado, Humboldt-Toiyabe, and Stanislaus National Forests. This Order is based upon the Mokelumne Wilderness Management Guidelines Decision Notice (DN), Finding of No Significant Impact (FONSI), the Land and Resource Management Plan Amendment (LRMPA) for the Mokelumne Wilderness Management Guidelines dated March 2000 and additional field observations. The circumstances upon which the DN, FONSI, and the LRMPA are based remain unchanged and, as a result, the need for this forest order continues.

Further justification for the Restricted Use Mokelumne Wilderness Order is as follows:

1. Camping. DN p. iii, LRMPA p. 32.

Overnight permits are required year-round in the Mokelumne Wilderness. Requiring overnight visitors to obtain a permit for camping provides the opportunity to inform visitors that their campsite choices may be prohibited due to trampling, soil compaction and overuse which results in loss of vegetation, degradation of water sources and has negative impacts to wildlife in the area. Permits also convey information about resource protection and visitor safety. The permit assists in search and rescue situations, and missing person reports, when we need to find a victim as quickly as possible. Further, data from permits provides valuable information on visitor use patterns which gives resource managers information to protect the resources from further damage.

2. Entering or being in the Mokelumne Wilderness as part of a group. DN p. iii, LRMPA p. 33.

Group size will be limited to 12 people per group for day use and 8 people per group for overnight use. The topography in much of the Mokelumne is not appropriate for larger groups. Larger groups have a significantly larger negative impact on natural resources through trampling and overuse that contributes to soil impaction and erosion and leads to loss of vegetation. Loss of vegetation contributes to loss of water quality. Larger groups contribute more pollutants to the area from food and trash which negatively impacts water sources. Larger groups also adversely affect wildlife through noise and movement and may keep wildlife from obtaining food and water.



3. Building, maintaining, attending or using a fire above 8,000 feet and in the Carson Pass Restricted Area (CPRA), as shown on Exhibit B. DN p. vii, LRMPA p. 39.

Campfires in the Mokelumne Wilderness are prohibited above 8000 feet and in the CPRA. The ecological basis for prohibiting campfires above 8,000 feet and in the CPRA is the low wood production of the slow-growing subalpine forest which exists above this elevation in the Mokelumne Wilderness. If campfires were permitted, most of these areas could not naturally replace the decomposing nutrients naturally occurring on the ground at the rate that they would be consumed by recreating wilderness visitors. The soils are very fragile due to the small amounts of organic duff being produced and appropriate locations for a wood fire are very few. To provide adequate clearances for a wood fire, and the wood fire itself, would result in scaring and resource damage to the soils, and wildlife habitat, that would last years due to the slow growing environment of the subalpine forest at higher elevations.

4. Building, maintaining, attending or using any fire in the area on the north and east sides of the Salt Springs Reservoir, as shown on Exhibit B. DN p. vii, LRMPA p. 39.

The Mokelumne Wilderness Management Guidelines DN called for prohibiting campfires within $\frac{1}{4}$ mile of the high water line along Salt Springs Reservoir. The LRMPA states, "Campfires are prohibited in the Salt Springs management area due to the heavy fuel loading, steep slopes and high wildfire danger" and "monitoring will be used to determine where and when campfire restrictions are needed below 8000 ft" (p. 39). In addition, campfires built below the high water line may disturb archaeological resources and add to visitor confusion about where campfires are allowed. Campsites are located up to $\frac{3}{4}$ mile above the high water line at the east end of the reservoir. Expanding the campfire exclusion zone from $\frac{1}{4}$ mile above the high water mark to the 4,600 elevation contour line on the north side of the reservoir, down to the Amador/Calaveras County line, and approximately 1 mile east of the reservoir (the middle of Section 32), will reduce visitor confusion, provide uniform campground management, and provide needed fire protection for rare archaeological resources and fire-prone vegetation.

5. Grazing a horse or other saddle or pack animal within the Round Top Special Interest area, as shown on Exhibit A. DN p. v, LRMPA p. 35.

Grazing of pack animals and stock is prohibited in the Round Top Special Interest Area (SIA) to protect the special botanical values. The Round Top SIA is a unique ecological area due to the large amounts and diversity of wildflowers and plants found in this area at the junction of three botanical provinces. This restriction protects this valuable resource from trampling and possibly being eaten. Due to the high elevation the flora has adapted to challenging conditions including a very short growing season, with snow cover and freezing temperatures most of the year. The flora would not be able to recover easily from the effects of livestock in the area.

6. Riding or allowing a horse or other saddle or pack animal off National Forest System Trails within the Round Top Special Interest Area, as shown on Exhibit A. DN p. v, LRMPA p. 35.

Requiring pack animals and stock to stay on National Forest System trails within the Round Top SIA will prevent resource damage. The Round Top SIA is a unique ecological area designated due to the large amounts and diversity of wildflowers and plants found in this area at the junction of three botanical provinces. The restriction protects this valuable resource from trampling and possibly being eaten. Due to the high elevation, the flora has adapted to challenging conditions including a very short growing season with snow cover and freezing temperatures most of the year. The flora would not be able to recover easily from the effects of livestock in the area.

7. Possessing more than 12 horses or other saddle or pack animals per group. DN p. vi, LRMPA p. 35.

This restriction would limit the numbers at one time and therefore reduce the amount of impacts created by saddle and pack animals. These impacts include reductions in vegetation by trampling, and by ingestion, and possibly bringing in noxious weeds with their food and waste. Their waste may contribute to the loss of water quality when concentrated in large amounts by large groups. Most stock groups require one animal per person to ride and additional stock to carry gear. To accommodate additional pack stock to carry gear, and still allow for a group size of 8 people for overnight use, 12 stock per group would be permitted for both day and overnight use. It is an appropriate limit based on the topography and resources in the Mokelumne, and considers the current patterns of use in the Mokelumne (i.e. roughly one pack animal for every 2 riders).

This Order will allow us to implement consistent standards and guidelines across administrative boundaries and to preserve the area's wilderness character. Use and enjoyment by visitors will be provided for in a manner that ensures their safety and the protection of this valuable resource over time.

Executed in Placerville, California, this 4th day of April, 2013

/s/ Kathryn D. Hardy

KATHRYN D. HARDY

Forest Supervisor, Eldorado National Forest

Executed in Sonora, California, this 10th day of April, 2013

/s/ Christina M. Welch

CHRISTINA WELCH

Acting Forest Supervisor, Stanislaus National Forest

Executed in Sparks, Nevada, this _____ day of April, 2013

WILLIAM DUNKELBERGER

Forest Supervisor, Humboldt-Toiyabe National Forest