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Echo Lakes Environment Fund  
311 Bernice Drive  
Grass Valley, California, 95945  
junetmbedayn@gmail.com

## **Feedback to TRTS planning team**

March 30, 2023

General Comments for TRTS Steering Committee from  
The Board of Directors of the Echo Lakes Environment Fund (ELEF). The Echo Lakes Environment Fund (ELEF) is a 501(c)(3) organization that promotes the conservation of the Echo Lakes Basin's wilderness ecology through research, policy studies, environmental activities, and education. In an effort to promote our mission, ELEF is submitting the below comments on the draft Tahoe Regional Trails Strategy. We are deeply concerned with the impact that the Tahoe Regional Trails Strategy will have on the environment of the Echo Lakes Basin. ELEF is requesting that both Echo Lakes Basin trails projects be removed from the TRTS.

**Echo Lakes Loop Connection (conceptual)** - The following  
are several objections to this project:

**A trail on the south side of Echo Lakes would be unsustainable:** Prior to the 1930's, the main public trail was located on the south shore of Echo Lakes, and continued on into what is now Desolation Wilderness and beyond. Due to frequent avalanches and abundant small streams on the Echo Lake section of the trail, the trail required constant maintenance to clear avalanche debris and reconstruct the trail year after year. Because of this, in the 1930's the trail was abandoned and moved to the rocky north shore of Echo Lakes, which is where it remains today. History should not be repeated in trying to reestablish a south shore trail, as the lessons were already learned long ago.

**Water Resources:** Of the roughly 70 cabins located along the south shore of Echo Lakes, all of them get their drinking water from springs above, on the mountain-side. These water sources are piped to water tanks, and then directly to cabins, and are a necessary and irreplaceable resource for the residents of cabins. There is no public trail or path near, adjacent to, or above

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these water systems, that would pose risk for contamination from human, dog, or horse excrement. Our fear is that a possible designated trail would pose an undeniable and serious risk to the cabins' drinking water. We feel it is not possible to construct a trail (that would likely see high use) in a way that avoids close proximity to south shore Echo cabins, and also preserves water quality of the water resource used for each of these cabins.

**Water Clarity relating to Lake Tahoe:** The south shore of Echo Lakes is steep, forested and rocky, and home to many riparian areas. There is a faint user trail along the shore of the lakes, but it becomes indiscernible and very difficult to follow after it reaches the cabins, and is nearly non-existent as the upper lake is approached. This is due to its very low use. Therefore, it sees very little impact and use in its current state, especially in the early spring when there is snow, snowmelt/runoff, and swampy areas. There are many wetlands, small streams, and avalanche debris to be avoided. Wetlands create an essential ecosystem and are necessary for water filtration and reducing sediment runoff. We fear that a significant increase in users will negatively affect water clarity by increasing sediment runoff, and damaging wetlands and riparian areas. The Echo Basin is under restrictions from the Lahontan Water Quality Board. No overnight camping is allowed in the Basin and all cabins around the lakes are required to have toilet systems with portable tanks to carry out all human waste.

The impact of creating a high-use, designated trail on the south shore of Echo Lakes is unsustainable in terms of its impact to water quality and water clarity due to potential erosion and sediment runoff and destruction of riparian zones. The idea of including mountain bikes or horses in this area is clearly to be avoided, as this would result in unacceptable and harmful amounts of sediment erosion. This will cause a trickle-down effect for Lake Tahoe water clarity.

The impact of the recent Caldor Fire, which burned down to the cabins along the south shore of Echo Lakes, presents even more concern for potential sediment runoff especially with new trail construction and resulting negative impacts on water clarity.

**Old Growth Forests:** There are several high elevation, mixed conifer old-growth forests on the south shore of Echo Lakes, which brings to attention the potential threat of this increasingly rare ecological niche. See [https://www.fs.usda.gov/psw/publications/documents/psw\\_gtr175/psw\\_gtr175.pdf](https://www.fs.usda.gov/psw/publications/documents/psw_gtr175/psw_gtr175.pdf) for detailed information on the location of these old-growth, high elevation, mixed conifer forests. Page 410, figure 5.1 shows the location of these forests, which is along the entire south side of Echo Lakes up to the ridgeline. This

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differs from the Montane Zone of Lake Tahoe. Old growth forests are increasingly rare, and are threatened by logging and increased destructive wildfire activity over the last several decades. Old growth forests aid in sequestering carbon and aid in combating climate change, and provide habitat necessary for species survival, most notably for the Endangered California Spotted Owl. We fear for the disruption of this already threatened and very special ecosystem through increased human presence, and how it may negatively affect the California Spotted Owl and its habitat.

**Increased Likelihood of Human Conflict:** Currently, the faint user trail on the south shore of Echo Lakes travels between and adjacent to (within a few feet) of cabins. In one case, the trail actually passes over a cabin's porch. Because of the very low use of this trail, it is generally a non-issue. Adopting the current location of this user trail as a designated trail is not acceptable nor is it sustainable. It is more likely users might go off trail and/or leave human or dog waste which would contaminate water resources. There would inherently be tensions and conflict between cabin residents and trail users. This brings us back to the option of aligning the trail above the cabins, which would be detrimental to the water resources described earlier in this letter. In addition to the issue of negotiating the steep and cliffy terrain immediately above the cabins, this combination of issues in itself makes the idea of a designated trail anywhere on the south side of Echo Lakes a non-viable and unsustainable option.

### **Large Maintenance Project - Tahoe Rim Trail - Echo Lakes:**

This section of the Pacific Crest Trail has served for nearly a century as an excellent trail for hikers and equestrians, and has been well maintained. We are curious as to why the trail needs to be improved, and what improvement would entail. This trail travels across beautiful glacial polish, which would be in part destroyed by significant trail construction. The ELEF is invested in preserving the natural beauty and integrity of the incredible glacial polish in the Echo Lakes basin and beyond to Desolation for all to experience and enjoy, and we are opposed to any project that may disrupt this natural phenomenon.

**Project Transparency:** The lack of transparency of this project as a whole is both concerning and discouraging. Our board first learned about the TRTS through a Facebook post on March 9, 2023. We are frustrated that we, as a board, were not aware of the trails strategy, especially this late in the project's fruition. Those in the Echo Lakes community, especially those who are not Facebook users may still be unaware of this proposed strategy, though

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we are working hard to contact all in our Echo Lakes community. The Echo Lakes community was not included in the ‘Stakeholder Assessment Survey,’ or alerted to the 2021 online public survey released in June of 2021, that preceded the drafting of the strategy. We were not alerted to and given an opportunity to attend the first webinar. Given that many of us are avid trail users, and reside in very close proximity to the PCT, we are intimately connected to and affected by the land and public trails. We hope to be more closely involved in future planning related to the Echo Lakes Basin, the Tahoe Basin, and Desolation Wilderness.

**Corrections for the TRTS:** On page 70 of the strategy, it lists the trailhead at Echo Lake as having Trash Cans. The trash cans at the Echo Lake Chalet (which is privately owned) are supplied and funded by the Echo Lakes Association (ELA). Also on page 70, it lists the Echo Lake Trailhead as having water. There is no city water at this site. The water available to this private property is sourced from a spring, the same as the rest of the cabins on the south shore of Echo Lakes. The spring is needed to run the facilities at the Chalet, and is not provided to the public to fill water bottles. These amenities need to be delisted from this site.

We appreciate and thank you for the opportunity to provide feedback on the draft Tahoe Regional Trails Strategy. We ask for your serious consideration that both of the Echo Basin trail projects be removed from the TRTS and we look forward to future opportunities for input and possible collaboration.

Sincerely,

The Board of Directors of the ELEF: Christine Robinson, Caroline D. Eshleman, Junet Bedayn, Jesse Bedayn, Maggie Phillips, Natasha Best



