

Sheep Mountain Management Project
C/O Joseph Carlson or the District Ranger
South Park Ranger District

Comments submitted electronically via
<https://cara.ecosystem-management.org/Public/CommentInput?Project=48896>

Dear Joe Carlson and Josh Voorhis;

Please accept and consider the following comments on the proposed Sheep Mountain Management Project on behalf of the Quiet Use Coalition and additional undersigned organizations.

We would appreciate a response to acknowledge of receipt of these comments, as we are not sure if the public comment page will do this.

Our members know, use and are familiar with this area. We have hiked (or tried to find/hike) on all of the routes depicted on the project map. We have also stayed overnight multiple times in the Horseshoe Campground.

This travel management proposal must comply with Pike San Isabel MVUM lawsuit settlement agreement

In late fall of 2015, a settlement agreement was reached in Civil Action No. 11-cv-00246-WYD between The Wilderness Society, Quiet Use Coalition, and three other organizations and the U.S. Forest Service. This case challenge the legal basis for a large number of routes depicted on Pike San Isabel Motor Vehicle Use Maps (MVUM) issued in 2009 and after. The settlement is a legally binding order which represents a significant compromise between the parties involved in this case. The settlement had specific stipulations included in it. In the spirit of compromise and cooperation, we request that the South Park District please review this settlement agreement, and make a good faith effort to adhere to the specific terms of this settlement agreement in this, and any other, proposed actions.

The full text of the settlement agreement is available online at
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/102995_FSPLT3_2604583.pdf

The Purpose and Need for this project must adhere to stipulations in the settlement

The “Purpose and Need” statements for this proposal must include requirements set forth in part 1.a. of the settlement agreement. (Settlement page 3). The Purpose and Need statements for this project do not include:

- 1) Statements that the PSI designated transportation system will comply with all applicable laws
- 2) Statements that the effects on resources will be considered with the objective of minimizing the impacts resulting from the designated motorized trails and areas pursuant to 36 C.F.R. § 212.55(b)

3) Statements to ensure that all routes are properly analyzed for environmental impacts.

These requirements must be included in all project proposals from the beginning so that the public and the US Forest Service both are reminded of what must occur as part of travel management proposals.

Project maps must depict the legally designated route system, as depicted on the MVUM

The current designated motorized route system, as depicted on the most recent South Park Ranger District MVUM, is very different from the online project map for this proposal.

The settlement agreement at 1 b, page 3 requires baseline maps for travel management to use the most recent MVUM prior to the settlement agreement. This would be the front side of the 2010 South Park Ranger District MVUM (valid for 2016).

There are numerous ways in which this online project map differs from the MVUM. Some of these include:

- Trail 691 is improperly depicted as intersecting with FR 176.2A on this project map. The current South Park MVUM depicts this route intersecting with FR 176.
- The alignment of Trail 691 is different.
- The alignment of Trail 740 is different.
- The manner and angle with which FR 176 intersects with FR 175 are not the same.
- FR 176.2A is extended over 100 yards on the online project map.

We request that all maps associated with this project be modified so that the baseline maps accurately depict the 2010 South Park District MVUM. Project maps which depict changes to the MVUM misrepresent the legally designated route system. Any changes to the MVUM must undergo site-specific environmental analysis and include public involvement as required by NEPA.

The modifications detailed above, and others, could be interpreted as violating parts 3, 4 and 5 of the settlement agreement. (Settlement, pages 7-8)

If the South Park District desires to propose modifications to the existing MVUM as part of this Sheep Mountain proposal, the District must clearly identify these as potential modifications on the project proposal map, and analyze these as possible modifications to the designated motorized route system available for public use.

We hope that the South Park District understands our (and the public's) perspective on this, and the desire to have a defined baseline legally designated route system which is only modified via a process which includes environmental analysis that includes public input.

Project maps must depict contested routes as per terms of the recent legal settlement

The settlement requires project baseline maps to depict all routes contested in the lawsuit as having their legal status contested. Eight routes (roads 178, 179 and 176.2A and Trails 660, 689, 691, 739 and 740) are depicted on the project map posted online were contested in the lawsuit, (Settlement, Exhibit A) and must be identified as such in baseline maps.

The online project maps available for this project do not depict the above routes as being legally contested, and we request that they be modified.

The depiction of legally contested routes in the baseline project maps is an important aspect of the settlement from our perspective. It identifies routes which we believe deserve additional scrutiny. We

request that the South Park District properly identify those contested routes in this and all future travel management proposals from the very beginning of the proposal, in order to adhere to the spirit of the settlement agreement.

Seasonal closures of roads in this area must be considered as part of the legal settlement

The settlement required consultation with CPW (Settlement agreement 2 d, page 6) on a number of roads and trails in this project area to determine if they should be seasonally closed to protect big game on winter range. FR 178, 179, Trails 660 and 689 are all specifically listed in Exhibit B #4 of the settlement agreement as requiring this consultation and evaluation because they exist in management prescription area 5B, managed primarily as big game winter range.

We understand that this consultation has occurred and that the South Park District is currently evaluating the results. Please recognize the settlement agreement requires implementation of any seasonal closures within 12 months of the time the settlement was finalized. This may be before the analysis for this Sheep Mountain project has concluded.

We request that the results of this consultation be made available, as they are pertinent to the routes being considered in this proposal.

Pending Forest wide travel management must be considered

One stipulation of the settlement agreement is that the entire Pike San Isabel National Forest must undergo and complete a forest wide travel management planning EIS process by the fall of 2020. (Settlement 1 e on page 4)

This will be a large comprehensive undertaking, which will require a significant commitment of time and resources.

The individual and cumulative effects of any decisions will be considered as part of this process. The more comprehensive “big picture” analysis which will occur during this process may include considerations (and cumulative effects) that would not be significantly considered or analyzed during a relatively small scale travel management plan such as this. Decisions made as part of this Sheep Mountain proposal may be modified or reversed as part of this future effort. Every route depicted on the online map for this Sheep Mountain proposal will be scrutinized during this process.

Knowing that the South Park District must complete a travel management plan on all of its lands within 4 ½ years, is considering the Sheep Mountain proposal now the best use of time and resources?

We believe it is pre-decisional to approve trail reroutes on trails which might possibly be closed in a pending analysis.

Decisions made as part of this Sheep Mountain Management planning process must not supersede or act as substitute for, future decisions that will be made as part of an imminent, larger and more comprehensive forest wide travel management planning process.

In a recent meeting we had with Forest Supervisor Erin Connelly and head planner John Dow, they admitted that they were not aware that small scale travel management plans such as this Sheep Mountain Proposal were occurring. Mr. Dow told us he would work with Districts to ensure that they comply with the terms of the settlement.

In a phone call in the late fall of 2015 soon after the settlement was finalized, Tom Sobal of the Quiet Use Coalition and District Ranger Josh Voorhis discussed the requirement to conduct District and Forest wide travel management planning.

There are aspects of this proposal that we support

We fully support the proposed decommissioning of a segment of Forest Trail 660

This route crosses/fords Fourmile Creek to join County Road 18. The crossing is supposed to be a single track motorcycle trail, but the route has been improperly marked and managed as an extension of FR 178.

This has resulted in an exceedingly deep and wide area being gouged out of the creek bottom which is unsafe and unfit for motorcycles to cross. All types of vehicles have been driving around in the riparian areas up and downstream from this ford searching for a safer and easier location at which to cross. This unauthorized use has resulted in significant damage to vegetation and riparian areas.

A large amount of dispersed motorized camping has occurred on both side of the creek, some of it within feet from the water. Much of the motorized use from this camping is unauthorized, as it is occurring far outside the 30-foot limit on legal motor vehicle use from a designated route. Much of this camping is contrary to Forest direction restricting camping within the initial 100-foot distance from lakes and streams. This camping and other use has denuded large areas of vegetation, resulted in the formation of large fire rings, led to trash dumping, resulted in erosion and sedimentation, and undoubtedly has resulted in the improper disposal of human waste.

This area contains a globally rare Montane Riparian Willow Carr (*Salix monticola / Carex aquatilis*) plant community, globally imperiled occurrences of Porter Feathergrass (*Ptilagrostis porteri*), and three additional state rare plants. It is also important elk and deer habitat.

Closing and decommissioning this route will have numerous positive effects on wildlife and habitat, water quality in Fourmile Creek, vegetation including rare and imperiled plants as well as increasing safety for forest visitors. Closing this route segment will go a long way toward making the management of motorized use in this area much easier.

We fully support the proposed decommissioning of a segment of FR 175

We fully support the proposed closure and decommissioning of the segment of the Breakneck Pass Road #175 west of the intersection with the Browns Pass Road #176.

The 2015 South Park Travel Analysis Process recommended decommissioning this road segment. It ranked it as having zero value, and moderate risks.

This road segment is a short dead end route which provides little recreational value. The presence and use of this route has significant impacts on elk, as it exists within a 2015 Colorado Parks and Wildlife (CPW) identified Elk Production (calving) area, and in a rather small ~2900-acre Elk Summer Concentration area. The PSI Forest Plan at III- 28-29 and Forest Plan Amendment 30 state that elk are a PSI management indicator species, the habitat needs of management indicator species must be provided for, and that actions must be taken to "Protect elk calving and fawning concentration areas from habitat modification and disturbance from May 15 – June 30."

This route is adjacent to the Weston Peak upper tier Roadless Area, and use on and off this route negatively impacts roadless area characteristics.

There is evidence of unauthorized motorized use off of this route segment, which contributes to cumulative negative impacts. This use occurs to the south of the road near the riparian area of Salt Creek. We have also observed evidence of unauthorized motorized use on and off the closed ML-1 section of FR 175 beyond the end of this route.

We presume this proposal will include decommissioning of the ML-1/closed .90-mile section of FR 175 beyond the publicly open segment of FR 175 proposed for decommissioning. There will be no possible motorized access to the ML-1/closed segment of this route if the segment of road leading to it is closed and decommissioned. The .9-mile-long closed ML-1 segment of FR 175 was ranked as having zero value in the 2015 TAP. It also received an overall rank of having high risks, and the TAP recommended that segment for decommissioning. This segment of road is steep, unsustainable, and is cherry stemmed for ~.65 miles into the upper tier Weston Peak Roadless area.

It appears as though this closure and decommissioning would only apply to ~.28 miles of FR 175 that is functionally open to public motorized use on the ground. Although MVUMs and older USFS GIS data indicate that FR 176 angles toward the south for .21 miles before intersecting with FR 175, functionally on the ground FR 176 continues straight west down the hill for .1 miles before it intersects with FR 175. This effectively lengthens FR 175 by .2 miles, and shortens FR 176 by .2 miles.

The latest January of 2016 USFS GIS data, available online via http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/102995_FSPLT3_2678696.pdf, indicates the on the ground alignment of these two routes.

We support the proposed closure of FR 178

We support the proposed closure of Forest Road 178 as a road.

We believe much of this route has been improperly marked and managed as a road. This route was single track trail 660, according to the last documented NEPA decision (the 1984 Forest Travel Map) which depicts this route as a motorized trail.

The 2015 TAP indicated that the only benefit this road provides is for recreation. The TAP found that this road posed high risks to watersheds, wildlife, botany and to finances /health and safety. This road was found to be an overall low benefit and high risk road.

Section 6.2 of the TAP states that Low benefit high risk roads should be considered for decommissioning and are not needed as part of the minimum road system.

This route passes through an area containing globally imperiled occurrences of Porter Feathergrass (*Ptilagrostis porteri*), a globally rare Montane Riparian Willow Carr (*Salix monticola* / *Carex aquatilis*) plant community, and three additional state rare plants.

Much of this road passes through CPW identified elk winter range.

Closing this road will help eliminate the large amount of unauthorized off route motorized use associated with dispersed camping which occurs in this area both near and away from Fourmile Creek.

Closing this road will improve water quality in Fourmile Creek; habitat for elk and other wildlife; habitat for rare/imperiled plants; eliminate concerns associated with unauthorized motorized use associated with dispersed camping, and make management of motorized use in this area easier.

We support the proposed construction of a bypass trail connecting Trail 691 and Trail 689

This would help prevent disruption of campers, and preserve desired camping experiences, of those staying in the Horseshoe Campground.

Present day conditions encourage and facilitate unauthorized motor vehicle use through this campground, which is prohibited by CFR 261.16 (o).

It must be recognized that many campers do not use trails, most do not ride motorcycles, and many may not know that this bypass trail is close to this campground.

The close proximity of the proposed bypass trail may negatively impact campers because of noise and exhaust emitted by motorcycles using it (that is if this new trail was approved as open to motorcycles).

We recommend this proposed bypass trail pass within 150 yards of the upper loop of FR 18.2A. This new trail should be located near to the campground in order to minimize the impacts of human presence and habitat fragmentation in this area.

We recommend that educational signage warn campers that there is a motorcycle trail in close proximity to this campground; if this bypass trail is approved for motorized use.

We also recommend that regulations be put in place as part of this decision prohibiting motorcyclists from creating excessive noise and fully opening their throttles on any point on these trails within a quarter mile of any designated campsites.

There are parts of this proposal we have concerns with

There are some parts of the proposal we oppose, disagree with, or need further information in order to make a decision.

We do not support the proposed reroute of Trail 740

Repeated attempts were made to find Trail 740 on the ground, as depicted on the MVUM. Although sections of this trail were located, they did not link up in the middle as depicted on the MVUM.

One potential segment of this trail (just west of Trail 689) was closed with a berm, marked with a no motorized use sign, and had numerous fallen trees on it until the fall of 2014. After a distance of approximately .25 miles west of Trail 689, evidence of this trail was non-existent.

We found evidence of crews attempting to build a new trail in this location in October of 2014. They were clearing brush and limbing trees in an attempt to create a trail corridor where none previously existed. There was evidence of attempts to create a trail straight up a steep gulley, where the trail passed between two large trees less than 24 inches apart.

In essence, crews were trying to construct a trail where there was no evidence that any designated route existed before.

This proposal does not consist of rerouting the segment of unsustainable Trail 740, it instead is proposing to create and designate a new segment of Trail 740 where none existed before.

Thus we request that this proposal be modified to state that a new segment of Forest Trail 740 is proposed to be created, and this should be evaluated and considered as such.

More information is needed regarding the size and location of the proposed trailhead

We would like more information regarding what exactly is being proposed as part of the trailhead along FR 176.

The project map makes the location of this trailhead difficult to pinpoint.

We would like additional information regarding the number of parking spaces for vehicles and how the parking area would be delineated

The current proposed location is very close to private land and houses. It is within a quarter mile of existing homes. Activity at this trailhead, including noise, lights at night and travel to and from this location, may impact adjacent home and property owners.

The proposed trailhead is in significant Colorado Parks and Wildlife identified habitat including a

Mule Deer Winter Concentration Area, Severe Winter Range, and within a significant Mule Deer Migration pattern area. We recommend that this trailhead, if approved, be closed between November 20 and May 1.

We are not sure of the value of this trailhead for the vast majority of forest users. Most hikers wishing to climb to near the summit of Sheep Mountain access Trail 691 from County Road 18. Anyone wishing to fish in Fourmile Creek would also access it from County Road 18.

Since this area provides limited opportunities for trail use, we recommend a small trailhead be created which could accommodate 6 vehicles maximum. The parking area for these vehicles should be directly adjacent to FR 176 and clearly delineated with barriers.

The impacts of promoting additional and new motorized use on these trails must be evaluated

Proposals to reroute these trails and remove their steepest and roughest segments install a new trailhead, and install kiosks with information on them will increase use of these trails.

We anticipate that the District will try to obtain a State OHV grant to pay for this. This will advertise and promote these trails as a motorcycle trail system statewide, and attract significant numbers of motorcyclists to these otherwise unknown and little used trails.

These are little known trails which have historically received minimal use, especially motorcycle use. Members of the Quiet Use Coalition have spent numerous days in this area, and have only once encountered a single motorcycle on trail 689. When we first tried to hike over trails 691, 740 and 660 in 2009, we saw very little evidence of any use. The route for trails 660 ad 740 could not be followed (there were no markings, and no trail tread was visible on the ground for the majority of these two trails).

In 2009 we spoke with members of a hiking club from Denver who had been climbing to the high point of trail 691 for over a decade. They had never seen a motorcycle on that route, and had never seen motorcycle tracks. These hikers, and our members, have stated that could be displaced from using these trails if motorcycle use increases.

Segments of 691 are not visible on the ground. The design and trail tread of sections of that trail would not be able to accept even moderate motorcycle use.

The steep and rough nature of the west end of trail 691 would limit any use to only expert riders. A proposal to reroute that section of trail would facilitate additional motorized use, and would remove challenge from that route which is desired by expert motorcyclists. Any proposal to reroute that trail must ensure that the new trail retains the difficulty and challenge of the existing route.

The individual and cumulative effects of additional, and in some instances new, motorcycle use on these trails must be evaluated. Planning must be conducted with an objective of minimizing impacts resulting from these routes and their use.

Some of the potential impacts of increase motorized use in this area which need to be considered include:

- Conflicts with quiet recreationists, and mixed use safety concerns on these trails
- Conflicts with nearby private home owners
- The impacts of increased motorized noise on wildlife and other recreationists
- An increased need for management, including education and enforcement
- Impacts resulting from destination motorcycle related dispersed motorized camping
- Funding for monitoring, management, education and enforcement

- The long term sustainability of this route system
- Long term implications of climate change.

We are concerned with the implications of this proposal and the possibility that it will increase motorized use in this area. We are opposed to actions which increase motorized use in this area, as that would displace existing users and upset the balance of uses in this area.

The managed and allowed uses for these proposed trail reroutes, new segment of trail and conversion of road to trail, and the trail class, must be disclosed

The proposal does not include managed, designed or other allowed uses for the new trail segments which are proposed. (new including proposed new connecting trail near the campground, new trail which could replace FR 178, and new segments of trail reroutes.)

We presume the District is proposing these segments to have a managed/designed use of motorcycle, with other uses below that on the trail hierarchy being accepted, but are not sure.

We are not sure what trail class is being proposed for these new trail sections. We recommend any reroutes retain the existing challenge and difficulty level of existing segments of trails.

The overall scope and nature of this analysis must be clearly defined.

All routes in this area, on the South Park District, and the entire forest will be analyzed in what is likely to be an EIS within the next 4 ½ years.

The routes depicted in this project area will be scrutinized as eight of them were contested in the PSI MVUM legal challenge which was recently settled.

We have concerns with the implications of proposing, and possibly approving, reroutes on segments of trail when the entire trail will be undergoing more comprehensive analysis in the near future.

This Sheep Mountain proposal must clearly define the nature and scope of this analysis.

Approving a segment of trail for a reroute in this proposal must not be considered as evidence that the entire trail has undergone, and been approved for designation, as a system route in a more comprehensive analysis.

Depicting trails or trail segments not proposed for modification on this project map must not be considered as an approving designation for those trails which may make them immune from future more comprehensive travel analysis.

For example, the upper segment of trail 691 from Trail 740 on the west to road 176 on the east must not be considered to have undergone full analysis just because it appears on this project map.

Decisions made as part of this Sheep Mountain Management planning process must not supersede or act as substitute for, future decisions that will be made as part of an imminent, comprehensive/inclusive and larger forest wide travel management planning process.

We understand a desire to address more immediate concerns in a timely manner with this proposal, and not wait for a larger decision.

We recommend that the highest priority parts of this proposal be addressed now, while other aspects could, and likely would best, be addressed in the future. We would rank the highest priority aspects of this proposal as follows:

- 1) Closing and decommissioning the motorized route segment trail 660 crossing of Fourmile Creek. This has the greatest resource and management impact. Even if the District began limiting motorized use across this creek to motorcycles only, it would make a huge difference. That would not require a decision as it would only be implementing the MVUM

- 2) Closing and decommissioning the dead end spur of FR 175. This would result in cost savings in management and maintenance, and have numerous resource benefits.

Additional Recommended Actions

What follows are additional actions which we believe should be considered in this proposal within the analysis area. Many of these proposals will be raised in a future required travel management analysis if they are not considered in this project.

Close and Decommission FR 176.2A

In the 2015 South Park District Travel Analysis Process, this road was determined to have an overall benefit score of zero and an overall risk score of 3. This road intrudes into a CPW identified elk production area. The TAP recommended this road for decommissioning. We highly recommend that this road be decommissioned as part of the decision with this proposal.

Close and decommission FR 176.2B

In the 2015 South Park District Travel Analysis Process, this road was determined to have an overall benefit score of zero and an overall risk score of 3. This road intrudes into a CPW identified elk production area. The TAP recommended this road for decommissioning. We highly recommend that this road be decommissioned as part of this proposal. If the private land owner wishes to retain this route for access, a formal agreement must be developed where this route becomes a permitted road, the permittee agrees to installing and maintaining a locked gate at the intersection of this road and FR 176, and the permittee agrees to accept maintenance responsibilities on this route which will limit resource damage.

Only permit licensed vehicles on FR 18.2A

Prohibiting unlicensed vehicles on this campground access road would have many benefits. It would implement a previous decision (Forest Order 92-05) which closed this road to mixed OHV use. It would help prevent mixed use safety concerns between highway licensed vehicles and OHVS on this ML-3 passenger car accessible road. It would help preserve peace and quiet, and limit dust and noise, for campers in the Horseshoe Campground. It would help prevent unauthorized unlicensed OHV use on Park County Road 18. It would help prevent use of unauthorized routes south of CR 18 and west of FR 18.2A, which are illegally being used by OHVs to connect to and illegally use FR 18.2B. FR 18.2B is already closed to mixed OHV use according to the MVUM and Forest Order 92-05.

Prohibiting OHV use on this road would help discourage non-camping riders from taking advantage of the facilities in this campground without paying a fee.

Those camping within the Horseshoe Campground that wish to access the trails on their motorcycles would be allowed to go directly to and from the trails from their campsites.

Only have one designated motorized trail entrance and exit into the Horseshoe Campground from the motorized trail system

The currently managed on the ground condition has two motorcycle trails (691 and 689) exiting and entering the Horseshoe Campground. These two trails encourage and facilitate motorcycle pass through

on FR 18.2A through the campground. This pass through use violates 36 CFR 261.16 (o) and has negative impacts on desired experiences for campers.

We recommend allowing paid campers in the campground to ride their OHVs to and from the trail system using the east entrance Trail 689 only. The west entrance Trail 691 should be closed to motorcycle use between the new bypass trail and the campground in order to prevent conflicts with hikers on the quiet use Limber Grove Trail 648 in that area.

Close the east section of FR 176 to unlicensed OHVs

If a motorized trailhead is created, or if it is not, we recommend closing the east segment of FR 176 (FR 176 east of what is now FR 178) to unlicensed OHVs such as ATVs and dirt motorcycles. This segment of FR 176 to private land is ~ 260 yards long.

FR 176 leads directly to Park County Roads 658 and 20. Park County actively enforces Colorado revised statute 33-108-14.5 which prohibits unlicensed OHVs on County Roads. Closing a short segment of FR 176 will help educate OHV users, assist them in making correct travel choices, and lessen the likelihood of them receiving a citation from the Park County Sheriff.

This will also concentrate OHV staging, parking and the noise and fumes associated with engine warm up in a location further away from private property and homes to the east. The junction of FT 176 and 178 is already only slightly over a quarter mile away from private homes. OHV noise and fumes from this intersection may readily be noticeable at private homes to the east, facilitated by primarily open flat grassy terrain and prevailing winds from the west.

Close and decommission unauthorized routes within the project area

A decision regarding this proposal must provide direction and authority for the USFS to close and decommission any and all unauthorized routes (which currently exist, or which may develop in the future) within the project area.

If crews and heavy equipment are going to be in this project area for implementation work, the effort required to transport them to these locations can be best used and maximized if they also can work on closing and decommissioning unauthorized routes.

Prohibit camping at or near the proposed trailhead

If a new trailhead is approved as part of this decision, the decision should include direction which prohibits overnight dispersed camping at or within a specified distance (200 yards as a minimum) of the trailhead. This would prevent conflicts at the trailhead, prevent parking space at the trailhead from being occupied by campers, help ensure that desired experiences of trail users are maximized, and help ensure that trailhead facilities are used primarily by trail users.

This proposal must include a decision regarding winter use of these routes

Any decision associated with these routes should will management objectives for a summer season (May or June through September). There will be a tendency of summer users to try to use the same routes during the winter season. Thus, some type of decision must be made regarding winter use and management of these routes.

In order to protect big game animals on winter range, we recommend any and all routes considered be closed to winter use.

Mitigate high risks posed by FR 176 and FR 179

While these roads were ranked as overall high benefit roads, they were also scored as overall high risk roads according to the 2015 TAP.

FR 176 was high risk due to its financial burden/public health and safety concerns, and also risks to wildlife and watersheds. FR 179 was a high risk road primarily due to the high risks it poses to watersheds and wildlife.

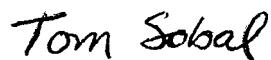
The TAP states on page 5-7 that high benefit roads that are also high risk roads can be part of the minimum road system “if associated risks can be adequately mitigated.”

This proposal must include a decision which includes specified actions that will help mitigate the risks posed by these roads if they are to remain open. The 2015 TAP identified both FR 176 and 179 as having high risks to wildlife due to the lack of a seasonal closure on these roads because they allow motorized use in big game winter range.

This proposal should include a decision to implement a seasonal closure on these routes to motorized use, and the installation of gates locked between Dec 1 and April 15, in order to help mitigate the risks to wildlife which these roads pose.

We thank you for the consideration of these comments.

Sincerely;



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