



Sent via email to: Smith, Rebecca A -FS rebecca.smith@usda.gov

October 1, 2020

San Juan National Forest
Attn: Becca Smith
P.O. Box 310
Pagosa Springs, CO 81147

RE: Valle Seco 2019 Land Exchange

Dear San Juan National Forest Staff,

Please accept the following comments from Trout Unlimited (TU) pertaining to the Draft Environmental Assessment of the Valle Seco 2019 Land Exchange.

TU is a non-profit conservation organization that has more than 300,000 members and supporters dedicated to conserving, protecting and restoring North America's trout fisheries and their watersheds. Statewide, Colorado TU has more than 10,000 members and 23 local chapters, including chapters in Durango, Cortez, and the San Luis Valley. Trout Unlimited is a partner to the San Juan National Forest in efforts like San Juan Headwaters, RMRI, 2-3-2, and reintroduction of the San Juan cutthroat trout.

Upon review of the Draft Environmental Assessment, Trout Unlimited would like to applaud the inclusion of alternatives addressing the closure of road 653 and the complimentary adoption of additional Roadless Area acres surrounding road 653. As stated in our scoping comments, this was our organization's primary concern and we believe that the proposed actions in Alternative 3 and Alternative 4 provide reasonable and positive management solutions to the Valle Seco landscape. Trout Unlimited wholeheartedly supports the adoption of Alternative 4, and would not oppose Alternative 3 or a combination of the two.

We, however, insist that Alternative 2 and the opening of road 653 to general traffic and its subsequent maintenance would be against the intent of the land transfer as a whole. Trout Unlimited and the angling and hunting communities which we represent are firmly opposed to adopting the recommendations in Alternative 2, specifically road 653's proposed management, and the lack of inclusion of roadless areas in Valle Seco.

Our first choice would be to see road 653 permanently decommissioned and the entire 7,425 acres as proposed in Alternative 4 be carried forward. This alternative provides the best protection for the most acres of winter concentration and severe winter range for Mule Deer. Alternative 4 is most consistent with the stated intent for pursuing the land transfer. And although we have stated the downsides to the transfer

out of public domain of other parcels included in the package, we believe that the responsible management of the winter wildlife habitat in Parcel A, the closure of rd 653, and the addition of significant roadless acres in the Valle Seco area are in the public's long-term benefit and justify the transfer as a whole.

TU also acknowledges the benefit to managers to have administrative access to road 653 and would support Alternative 3's proposed 4,675 acres of CRA additions and the closure of road 653 to public use. This alternative would be most appealing in the case that the San Juan National Forest intends to pursue additional habitat improvements for wildlife in the Valle Seco area to further the commitment to the management of critical wildlife habitat in the rare sagebrush ecosystem.

Roadless areas

Across all alternatives, the addition of 529 acres to the Winter Hills/Serviceberry Mountain Colorado Roadless Area makes common sense and has our support. It simply does not provide sufficient public benefit to justify the transfer in the case of the adoption of Alternative 2 however. We again urge the Forest Service to look towards the inclusion of additional roadless area inventories as outlined in Alternatives 3 and 4. The overlap with winter and critical winter range for mule deer alone should suffice to justify the management direction for the additional ~ 4,600 to 7,400 acres of CRA additions as proposed. Please see our scoping comments for additional sources regarding the science linking undisturbed habitat and large ungulate migration corridors and overall herd health.

Road 653 reconstruction

Our largest issue with this proposal comes with the reconstruction of road 653 as proposed in Alternative 2. The stated intent of acquiring the Valle Seco property, "A", as mapped, is for winter wildlife habitat. If road 653 were to be reconstructed and opened for motorized use upon acquisition it would fundamentally and permanently change the character of the winter wildlife habitat and migration corridor upon which the land transfer is predicated.

Trout Unlimited strongly suggests that closing road 653 be the ultimate decision of the San Juan National Forest. We see the benefit to either an administrative road or a full decommission. If Alternative 3 is selected to keep road 653 open to administrative use, we urge the Forest to use best practices to keep public use from overtaking the closure, including through increased monitoring and enforcement.

Trout Unlimited thanks you for the opportunity to participate in this public process and would like to reiterate our appreciation of the partnership we have long enjoyed with the San Juan National Forest. Once again, our recommendation is to adopt Alternative 4, but we do support Alternative 3, and we are strongly opposed to Alternative 2.

Sincerely,



Garrett Hanks

Trout Unlimited
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Durango, CO 81301