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First name: Sherri

Last name: Lionberger

Organization: Last Chance Back Country Horsemen

Title: Past Chair

Comments: Upon reviewing the Final EIS, Forest Plan and Record of Decision, we are pleased to find that a number of our comments prepared for the Draft EIS have been included. However, we do find it necessary to object to some elements of the decision. Please find the attached objections on the suggested template format. We look forward to participating further in the objection process.

Statement of issues and/or parts of the plan revision to which the objection applies:

Upon reviewing the Revised Forest Plan, Final EIS and ROD we feel compelled to file objections to a couple of items concerning the Land Management Plan. Both of these issues were addressed in our comments to the Proposed Action and Draft EIS. While we do appreciate that a number of our comments are being implemented in the final, two specific issues were not adequately addressed.

1. Our first objection concerns the Recreation Opportunity Spectrum (ROS) suitability.
2. Our second objection deals with the decision to consider mechanized use in the Core of the Elkhorn Mountains as a suitable activity along with the Core boundary change between the Draft EIS and Final EIS.

1. Concise statement explaining the objection and suggesting how the proposed plan should be improved:

The reasons for this objection are:

Our first objection concerns the Recreation Opportunity Spectrum (ROS) suitability. While we understand the Forest is utilizing a national protocol for mapping ROS, that system has a serious flaw in the Primitive setting suitability and the forest has the discretion to remedy that issue. The national system provides for mechanized use to be suitable in all six categories of the ROS. There is no recognition, nor provision, for the traditional foot and horse means of access to have a [primitive] ROS setting with that type of recreational opportunity and experience. The relatively new means of access, mechanized travel, has been deemed suitable in the Primitive setting. The new fast-paced mechanized mode travel and a primitive experience are mutually exclusive. The national system recognizes that there are significant experience differences between various modes of travel in similar physical settings since it describes two categories of access as appropriate in Semi-Primitive settings. Semi-Primitive Non-Motorized (SPNM) has mechanized, foot and horse for access methods while Semi-Primitive Motorized includes motorized use. We submit there exists a difference in experience between mechanized and foot/horse means of access that is just as important. Foot and horse users are by far the vast majority of recreationists currently accessing Primitive settings, even where they exist outside of designated wilderness areas. Their desired experience should not be negatively impacted by a new, modern, mode of access. To be perfectly clear, mechanized use definitely has very real and significant negative impacts to the desired primitive experience of other users!

The trail from the end of the Alice Creek Road to the Continental Divide Trail and the area to the south of this trail should have a ROS of SPNM and allow mechanized access. For some reason this area has been changed from the Draft EIS.

Proposed Solution:

Remedy: The Forest Supervisor has the discretion to identify special areas within the Primitive setting where mechanized should not be considered suitable. We applaud that this discretion was used to deem mechanized

use not suitable in Recommended Wilderness Areas. Our suggested remedy is to apply that same rationale to all mapped Primitive settings. They all have [ldquo]special[rdquo] characteristics for a variety of reasons. The Primitive ROS area in the Alice Creek drainage should match the Recommended Wilderness Boundary. The remainder of the area described above should be reclassified as SPNM.

In addition, we recommend the Forest and Region submit changes to the National Recreation Opportunity Spectrum Mapping Protocol to eliminate mechanized use from being suitable in Primitive settings.

Statement demonstrating the link between objection and prior formal comments:

In our letter of comments to the DEIS, we clearly stated that the Primitive ROS should not be suitable for mechanized use.

2. Concise statement explaining the objection and suggesting how the proposed plan should be improved:

The reasons for this objection are:

Our second objection deals with the decision to consider mechanized use in the Core of the Elkhorn Mountains as a suitable activity. As the only Wildlife Management Unit (WMU) in the entire National Forest System, wildlife habitat and management in the Elkhorn Geographic Area (GA) should be given special consideration. We strongly supported Alternative C which would have deemed mechanized use in the Core of the Elkhorn GA not suitable. By not selecting this element of Alt. C, the decision certainly has not given wildlife and their habitat needs any special consideration. In fact, in the Forest Plan discussion in the Wildlife section of the Elkhorn GA, it is stated that there is no need for any specific direction more than what is contained in the Forest-wide wildlife section. No special direction for the only WMU in the National Forest System?? Un-believable! Adjacent geographic areas do have specific direction to protect or enhance wildlife values. Why not in the WMU? The special WMU designation does not seem to have provided any benefit for wildlife.

It appears that the Forest[rsquo]s own wildlife biologist[rsquo]s analysis of studies on mechanized use impacts on wildlife was ignored or discounted, as was her recommendation for a decision to call mechanized use not suitable in the Core. We do understand there are other studies on the subject that are not as conclusive as the ones cited by the wildlife biologist. However, at best, it would seem it is a toss-up on just how mechanized use impacts wildlife. The decision in this uncertain situation should have been made in favor of wildlife, not in favor of a relatively new recreational activity that has not yet been thoroughly vetted. Again, this is a WMU. Guideline 01 in the Wildlife section for the Elkhorn GA, states in part [ldquo]Maintenance, enhancement, and restoration of wildlife habitats should be the priority for resource management in the Elkhorn Wildlife Management Unit.[rdquo] This guideline also seems to have been ignored or discounted when deciding to call mechanized use suitable in the Core.

It should be noted that there is currently NO established pattern of any substantial mechanized use in the vast majority of the Core area. There is some use on the extreme north end of the Core area as mapped in Alt. C of the Draft EIS. We do not think it makes any sense to encourage the development of a new recreational activity in the heart of the WMU. It is far easier to prevent a problem from developing rather than trying to fix it later when problems are identified. The FEIS has reduced the size of Alt. C from what was mapped in the DEIS. We cannot find any definitive rationale for this change in the Core area, so object to the change. The boundary on the north end was moved south therefore removing some trails that would have been deemed not suitable for mechanized use in Alt. C. We believe the Core was best represented as mapped in the DEIS and that should be the entire area not suitable for mechanized use. There is currently extensive trail use by all non-motorized recreational activities just north of the Alt. C boundary so it is important maintain this transition zone between the heavily used

area and the Core.

Proposed Solution:

Remedy: Implement Alt. C component that determines mechanized use to be not suitable, as mapped in the DEIS, for the Core area of the Elkhorn GA.

Statement demonstrating the link between objection and prior formal comments:

In our letter of comments to the DEIS, we clearly stated we believed the Alt. C component that identified mechanized use to be NOT suitable in the Core of the Elkhorn GA should be selected.