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Title: Director

Comments: October 30th, 2023 USDA Forest Service, Rocky Mountain Region Attn: Reviewing Officer

C/O Director of Strategic Planning

2nd floor, 1617 Cole Blvd. Building 17 Lakewood, CO 80401

Subject: Grand Mesa, Uncompahgre, Gunnison National Forests Revised Land Management Plan

Responsible Official: Chad Stewart, GMUG Forest Supervisor Submitted via: online portal

Dear GMUG Planning Team,

Please see the following objections to the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision Final EIS.

Mason Osgood shall be the lead objector, per 36 CFR 219.54(c)(3).

Sheep Mountain Alliance represents more than 700 members and supporters. Our members use the national forest in many varied ways. They are hikers, hunters, anglers, bikers, horseback riders, foragers, photographers, climbers, boaters, guides, business owners, and ranchers. They rely on the GMUG national forest to support their livelihoods, provide opportunities for solitude and recreation, and to support their health and wellness through a wide range of ecosystem services.

**A. THE FINAL PLAN MUST PROTECT LEGISLATIVELY PROPOSED SPECIAL MANAGEMENT AREAS (SMAs) IN THE SAN JUAN MOUNTAINS**

The areas within the GMUG that are part of the Colorado Outdoor Recreation and

Economy Act have gone through an extensive public stakeholder process over the last decade that has honed their boundaries and eliminated multiple user conflicts. They should be incorporated in their entirety, including Special Management Areas around the Liberty Bell and Sheep Mountain Areas. Sheep Mountain Alliance has long supported these legislative initiatives.

The Sheep Mountain and Liberty Bell East SMAs, which are part of the Colorado Outdoor Recreation and Economy Act (CORE), have long established business, public, and elected official support. These SMAs were carefully designed to protect these highly valued landscapes, while allowing existing

non-conforming uses such as heliskiing, a competitive long distance running race and mountain biking. These proposed areas, both legislatively and through the GMUG plan revision process, are home to outstanding and unique landscapes home to recreational, wildlife, and ecological values. These proposals are the results of

decades of advocacy and public process. The 2012 Planning Rule grants the Forest Service authority to designate and protect these areas as Special Management Areas (SMAs) in forest plans.<sup>1</sup> Agency regulations make clear that the Forest Plan must [ldquo]reflect[] the unit[rsquo]s expected distinctive roles and contributions to the local area, region, and Nation, and the roles for which the plan area is best suited[hellip][rdquo] as well as [ldquo]the unit[rsquo]s unique capabilities, and the resources and management of other lands in the vicinity.[rdquo]<sup>2</sup> The Forest Service should adopt the proposed SMAs with specific plan components to ensure the final forest plan provides clear, concise management direction for the Forest Service and the public.

Proposed Recommendation: The Forest Service should designate the proposed SMAs in the San Juan Mountains as reflected in the Colorado Outdoor Recreation and Economy Act (CORE)

## B. THE PLAN DOES NOT ADEQUATELY ANALYZE OVER-SNOW VEHICLES IN OPHIR VALLEY AND BRIDAL VEIL BASIN

Under 36 CFR 212 subpart C of the Forest Service[rsquo]s travel management regulations, each national forest with adequate snowfall must designate and display on an [ldquo]over-snow vehicle use map[rdquo], a system of routes and areas where over-snow vehicle (OSV) use is permitted based on protection of resources and other recreational uses. OSV use outside the designated system is prohibited. Implemented correctly, the rule presents an important opportunity to enhance quality recreation opportunities for both motorized and

non-motorized winter users, protect wildlife during the vulnerable winter season, and prevent avoidable damage to vegetation, air and water quality, wilderness values, and other resources. It is important that the revised forest plan provides a strong framework for management of OSV use and for subsequent winter travel management planning under subpart C.

Proper designation of areas in compliance with subpart C and the minimization criteria will require most national forests to undergo a paradigm shift in OSV management. Subpart C, specifically rejects this default [ldquo]open unless designated closed[rdquo] approach, and instead requires the Forest Service to [ldquo]designate[rdquo] specific areas and trails for OSV use (consistent with the minimization criteria), and prohibits OSV use outside of the designated system. See 36 CFR 212.80(a). In other words, subpart C requires forests to make OSV designations under a consistent [ldquo]closed unless designated open[rdquo] approach.

The Recreation Desired Condition (FW-DC-REC-01) states:

The GMUG provides a variety of high-quality, year-round recreation opportunities across a range of resilient recreation settings[mdash]from primitive to rural, and gradients between. Recreation opportunities and facilities (1) meet persisting and evolving needs of diverse user groups[hellip].

In reference to meeting persisting and evolving needs of diverse user groups, one should expect comprehensive programmatic plan level decisions for current and future suitability determinations for winter recreation opportunity spectrum settings (ROS). However, it seems the necessary plan level analysis was not carried out for many important winter recreation areas on the GMUG. See III FEIS at 207.

The existing inventory of ROS settings are determined by an 11-step process outlined in the national protocols (WinterROSInventoryMappingProtocol-ver12\_Aug2019) as required by Forest Service Manual 2300, Chapter 10. The existing ROS inventory was created during the Plan assessments, and the Agency considered and incorporated existing Subpart C Travel Management decisions into the existing ROS inventory. For example, the

routes and areas from the Grand Mesa's OSVUM were considered and used in the modeling. Other winter travel decisions and closures were also used in the mapping, including the 1995 Crested Butte Winter Travel EA and the 2005 Washington Gulch CE Wildlife closure areas such as Almont triangle were considered, and conversely, areas open to OSVs such as the area north of Ophir were used in the development of the existing and desired winter ROS settings. Existing travel management decisions are represented in the preferred alternative's desired winter ROS settings unless documented in the project record for other site-specific reasons. Desired Winter ROS settings were established as documented in the Assessments, FEIS, project file and ROD in accordance with the 2012 Planning Rule. That process incorporated existing Travel Management Decisions such as the Grand Mesa's OSVUM, Crested Butte's 1995 EA, and the existing decisions around Ophir.

Future Travel Management Plans or OSVUMS would be project-level decisions subject to 36 CFR 212.

As described above to fulfill requirements under subpart C, Forest Service must designate as open to motorized use only those discrete, delineated areas that are appropriate for cross-country OSV use and minimize environmental damage and conflicts with other recreational uses. These recreational uses are noted in a response to comment regarding Ophir Valley (III FEIS at 210) stating:

The planning team, including local FS staff, gave a hard look at the area [Ophir Valley/Bridal Veil] and weighed multiple resources, including wildlife, existing travel management decisions, and existing and desired recreation opportunities in this area. Though the area is used by backcountry skiers and is not heavily used with motorized OSVs, it does provide some more remote hybrid skiing opportunities that cannot be accessed on foot alone.

Furthermore, much of the area is above tree-line, frequently used by an authorized heli-skiing operation, and the existing travel management decision designated this area as

open to motorized OSVs. Thus the preferred alternative is to manage the desired Winter ROS setting as Semi-Primitive Motorized.

The Town of Ophir as well as Sheep Mountain Alliance has expressed its concerns to us as well as to the Forest Service over the Winter ROS designation at the West End of Ophir Valley leading up to Ophir Pass. Ophir has repeatedly asked to have these settings changed to semi-primitive non-motorized, due to their very real concerns about avalanche hazards, backcountry safety, and potential impacts to lynx, which have been sighted in the area.

The Town of Ophir currently has an ordinance against motorized over snow vehicles in town limits. The FEIS response above demonstrates the lack of knowledge pertaining to current and future desired use in Ophir Valley. The Winter ROS decision made in Bridal Veil basin and the northern half of Ophir Valley was made in direct opposition to decades of non-motorized use, and a desired future to keep it as such. There has been no analysis done to base the existing and desired recreation opportunities in this area. To place half of a heli-skiing operations permitted area in a Winter semi-primitive non-motorized setting (operations still allowed under permit), while designating the other half of the permit zone as semi-primitive motorized is incongruent. ROS Settings are defined by distance from designated motorized routes and areas. For winter purposes, there aren't any official designated routes in the Ophir area. There is no current travel management plan for over snow vehicles (OSV). Ophir believes that the designation of areas for winter motorized traffic without this plan in place unduly influences future decision-making by the agency. Especially in light of OBJ-REC-06, which states: [dquo]Within 10 years of plan approval, to reinforce semi-primitive non-motorized settings, eliminate at least two unauthorized motorized travel routes.[rdquo]

Suggested Improvements

Recommendation: The final plan should provide further analysis on current and future desired conditions in the Bridal Veil Basin, Bear Creek, and Ophir Valley area for winter recreation.

Sincerely, Mason Osgood

Executive Director

Sheep Mountain Alliance

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[Footnotes]

1 The regulations specifically require that [ldquo][e]very plan must have management areas or geographic areas or both. The plan may identify designated or recommended designated areas as management areas or geographic areas.[rdquo] 36 CFR [sect] 219.7(d). The responsible official with delegated authority may designate new areas or modify existing areas, when approving the plan, plan amendment, or plan revision. 36 CFR [sect] 219.7(c)(2)(vii). SMAs are managed to emphasize specific values (e.g., ecological, geological, scenic, recreation, or other specific values). Management activities and uses are permitted in these areas only to the extent that they are in harmony with the purpose for which an area is specially designated. The plan or decision designating each area is supposed to provide specific objectives, standards, and guidelines for management of each area.

2 36 C.F.R. [sect] 219.2(b)(1).