

USDA Forest Service
Rocky Mountain Regional Office
Attn: Objection Reviewing Officer
PO Box 18980
Golden, CO 80402

Submitted electronically via <https://cara.ecosystem-management.org/Public//CommentInput?Project=48214>

Re: Objection to Pike & San Isabel National Forests Motorized Travel Management (MVUM) Analysis

To Objection Reviewing Officer,

Objector Colorado Mountain Club files this objection to the Pike & San Isabel National Forests Motorized Travel Management proposed project (Project), Final Environmental Impact Statement (FEIS), draft Record of Decision (DROD) and Forest Plan Amendment, noticed November 6, 2020. Diana Trujillo, Pike & San Isabel Forest Supervisor, Responsible Official.

Colorado Mountain Club filed timely comments on this project on September 8, 2016, November 4, 2019. We have standing to object, and our objections pertain to the substantive issues that we raised during scoping and in our comments on the project's draft EIS. As required by 36 C.F.R. § 218.8(d), the lead objector is as follows:

Julie Mach
Conservation Director
Colorado Mountain Club
710 10th Street Suite 200
Golden, CO 80401
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We offer the following objections and resolutions to improve the final decision:

Objection Point #1: The Forest Plan Amendment proposed for the modification of 3A areas of land to exclude roads 126, 398 and 398.B will negatively impact natural resource protection and quiet use.

- Modification of 3A management areas should not be utilized to accommodate unsustainable route designations. Specifically, NFSR 398 is known to intersect with impaired watersheds, riparian areas, soils with high erosion, alpine vegetation communities and wildlife habitat as identified in the Final Environmental Impact Statement Table 3-71. The Forest Plan Amendment creates a cherry stem into a 3A area without sufficiently mitigating the impacts of the route.
- The 3A modification allows for the opening of NFSR 398.B which is currently closed. The Travel Plan should tier to the existing Forest Plan and not vice versa.

Suggested Resolution: Do not modify the Forest Plan to adjust 3A management areas to accommodate the opening of roads 126, 398 and 398.B.

Objection Point #2: The Forest Plan Administrative Correction No. 1 violates the National Forest Management Act 16 U.S.C. § 1604(i). The proposed modifications to 3A areas exceed any reasonable interpretation of an allowable administrative correction and constitute a significant change in the long-term goods, outputs, and services projected for an entire National Forest.

- The correction seeks to modify 3A management areas, which now prohibit public motorized over snow vehicle (OSV) use, to some other management area prescription, which would allow public motorized over snow vehicle use. The proposed conversion of 3A MA land to 2A, 2B, 6B and 7A MA land will modify the allowed areas where OSV use is allowed. Snowmobiles use is allowed

when operating on snow according to general direction in the Forest Plan within 2A MAs (Plan at III-109), 2B MAs (Plan at III-119), 6B MAs (Plan at II-164) and 7A MAs (Plan at III-172). This is a substantive change and cannot be done without a NEPA process including full analysis and public involvement. 36 CFR 212.18 (b) and (d) both require public involvement when areas for OSV use are determined.

- The stated loss of 2560 loss of semi-primitive non-motorized 3A management area land, land that is closed to public motorized use, is a significant substantive change that adversely impacts quiet use recreationists, wildlife, adjacent private land owners, and natural resources. It also increases potential conflict amongst uses and has not been sufficiently analyzed.

Suggested Resolution: 1) Do not modify 3A management areas via an administrative correction, 2) Ensure route designations comply with existing 3A management prescriptions and 3) If modification of the Forest Plan management areas is desired, the USFS should initiate a NEPA process, that includes public involvement, to modify the Forest Plan.

We look forward to discussing and resolving these objections. Sincerely,

Julie Mach
Conservation Director
Colorado Mountain Club