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January 7th, 2018

Karen Chadwick

Objection Reviewing Officer

San Juan National Forest

15 Burnett Court

Durango, CO 81301

Submitted via objection website to: <https://cara.ecosystem-management.org/Public/CommentInput?Project=44918>

And via email to: r02admin\_review@fs.fed.us

RE: Objection by Sheep Mountain Alliance to the Forest Plan Amendment Decision in the Draft Record of Decision (DROD) and the Final Environmental Impact Statement (FEIS) for the Rico-West Dolores Roads and trails (Travel Management) Project dated November 2017.

To Forest Supervisor Chadwick

Sheep Mountain Alliance submits the following objection to the US Forest Service's Forest Plan Amendment Decision in the Draft Record of Decision and the Final Environmental Impact Statement for the Rico-West Dolores Road and Trails (Travel Management) Project. Additionally, we object to the decision to select Alternative B Modified as the project-level decision, although we are aware that due to confusion for the multiple timelines, we are outside the objection period for the project-level decision.

Karen Tuddenham

Sheep Mountain Alliance

PO Box 389

Telluride, CO 81435

Tel: 970-728-3729

Founded in 1989, Sheep Mountain Alliance (SMA) is a grassroots organization based in Telluride, CO, which represents over 700 members and supporters locally and regionally, as well as many visitors and second home owners who rely on the integrity of the natural environment in the Telluride region for recreation, solitude, and livelihood. Our members are important stakeholders in the Rico-West Dolores Travel Management Planning process and we are committed to amplifying their concerns. Our members frequently use the areas in question for a variety of recreational and livelihood-based purposes.

The Rico-West Dolores area is known for its beauty, its diverse wildlife, and the high alpine peaks and headwaters that are enjoyed by hikers, bikers, foragers, horseback riders, hunters and other recreational users.

While there has been significant and growing motorized use in the RWD area over the last decade, SMA strongly believes that this use needs to be carefully considered and fully assessed in terms of its environmental, social, and noise impacts. Local residents in Rico have expressed their desire for reduced motorized use in their area, and conflicts with non-motorized users have been extensively documented in previous comment letters.

Objection summary:

SMA believes the Record of Decision to be in violation of the Forest Plan for the following reasons:

1. The Forest Plan provides specific direction to avoid ground-disturbing activities on lands that have potential for mass movement. The Eagle Peak and North Calico trails, if carried forward as motorized specifically violate this directive.
2. The Forest Plan advises limiting or avoiding activities that would impact elk production. The proposed seasonal limitation on certain motorized trails is insufficient to meet this guideline, which suggests a closure period of May 15 to June 30 for elk breeding. Additionally the directive to protect ungulate populations is not met because security areas for elk are imperiled by the noise and activity around the trails designated motorized.
3. Similarly, the judgment that no scenic impacts will be present is incorrect, because the noise of motorized vehicles in high alpine environments without buffers is a direct scenic impact.
4. Directives on Wetland and Riparian ecosystems and aquatic ecosystems and fisheries are also violated due to increased sediment delivery that will result from continued and/or intensified use of motorized areas like the North Calico trail.
5. No dedicated non-motorized alternative was ever analyzed.
6. No correct baseline (that of the 1992 Forest Plan) was ever established as a basis for comparison. Instead considering a large number of trails as motorized which never underwent a NEPA analysis with public comment.
7. Finally, the standards and guidelines respective to terrestrial wildlife do not mention lynx, despite your field reports of suitable habitat in the project area. As mentioned in the FEIS, there is no well-defined threshold by which we can measure lynx disturbance against road and trail densities. For this reason, I implore you to reconsider decommissioning the remaining trails in the Bear Creek, Black Mesa and East Dolores areas, which were identified as the most suitable habitats.

SMA specifically supports and incorporates the Wild Earth Guardians Objection dated December 22, 2017, as well as the objection letter submitted by Stephen Johnson dated December 28, 2017, and the objection letter dated December 20, 2017, from Robert Marion (CBHA).

Thank you for your consideration of our objection. We encourage you to reconsider the DROD in light of the information provided by the objection letters listed above.

Sincerely,

Karen Tuddenham

Executive Director  
Sheep Mountain Alliance  
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