



October 25, 2016

Saguache Ranger District
Att: Tristram Post District Ranger
46525 St Hwy 114
Saguache, CO 81149

Re: La Garita Hills Restoration Project

Dear Mr. Post;

Please accept this correspondence as the comments of the above Organizations in favor of Alternative 2 of the La Garita Hills Restoration Project on the Saguache Ranger District. Prior to addressing the specific comment points, a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

The Trail Preservation Alliance ("TPA") is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA currently has 2,500 members. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and

local, state and federal legislators. For purposes of this comment, Colorado Off-Highway Vehicle Coalition, the Trail Preservation Alliance and Colorado Snowmobile Association will be referred to as "the Organizations" in this comment.

Restoration efforts significantly improve recreational opportunities.

The Organizations have been involved in numerous restoration projects in areas that have been heavily impacted by various invasive species, such as the mountain pine beetle, spruce beetle and others and can say when properly performed these restoration projects significantly improve the quality and safety of recreational opportunities in the planning area. The Organizations have partnered with Colorado Parks and Wildlife Trail Program for an extended period of time and have established 25 good management crews for trail maintenance throughout the state that target the basic maintenance of trails and related facilities. The Organizations are aware that most of these multiple person crews are now spending the bulk of their time simply removing fallen trees that are crossing trails due to the high levels of dead trees that are now populating Colorado forests. These dead trees are compounding the existing problem of exceptionally high forest density due to limitations in place on timber sales erroneously based on the position that not cutting trees would improve forest health. As managers have now determined the impact has been exactly the opposite.

The Organizations are also aware that many mitigation/restoration efforts are undertaken with minimal impact to recreational activities in the area when there is good communication between managers and recreational users and groups. The Organizations would request that USFS managers work with local clubs and organizations as the restoration efforts move forward to educate users when restoration will be taking place and work to provide temporary reroutes in areas where restoration efforts are being undertaken in order to

Restoration efforts greatly improve safety of users of public lands.

The Organizations believe that the current high levels of dead and diseased trees pose a serious safety threat to all users of public lands and that restoration efforts greatly reduce these threats. These basic safety issues for public usage were highlighted in 2012 in the Laramie Ranger District when a snowmobiler was struck by a falling tree while traveling on a designated trail.¹ While the public accepts a wide range of risks recreating in the backcountry, the risks due to falling dead trees is somewhat troubling as these are risks that can be

¹ http://www.laramieboomerang.com/news/snowmobiler-killed-by-falling-tree/article_541d7db5-b96c-58a3-b8c5-40cf329fd17e.html

managed, and the Organizations vigorously support any efforts that can reduce the risk to the public from dead and falling trees.

Restoration efforts are economic drivers both in the long and short term and benefit habitat and forest health.

The Organizations would be remiss if the positive economic impacts of forest restoration and mitigation efforts was not clearly and vigorously stated in these comments as many local communities in Colorado are overly dependent on high quality recreational opportunities on adjacent public lands for the community basic survival. Rather than providing our own summary of this research and reasoning, the Organizations received an exceptionally good outline of the impacts of these actions on local communities from the USFS as part of their science you can use newsletter series², where the wide ranging benefits to communities, watersheds and wildlife were extensively discussed. The Organizations submit that the USFS best available science position on these issues carries far more weight in these discussions than anything we could ever provide.

Restoration efforts improve species habitat quality.

The Organizations would add only one thing to the newsletter, mainly that many endangered species are identifying the primary threat to the species as wildfire, such as the greater sage grouse and mexican spotted owl. As a result, not only do restoration efforts provide a wide range of benefits to communities and recreational activities, these efforts may be compelled at some point in the future under the Endangered Species act.

The Organizations would also note that throughout the EIS numerous concerns are raised involve issues around possible lynx habitat and the EIS relies incorrectly on the Southern Rockies Lynx Amendment as controlling for management of the habitat and species. The Organizations would also note that the on-going requirement to manage to best available science and avoid application of outdated management standards in the development of new forest or resource plans was specifically addressed in the new Lynx Conservation Assessment and Strategy ("LCAS"). While the LCAS is highlighted here similar provisions are found in almost all species specific management documents that have been created. The LCAS specifically provides as follows:

"This edition of the LCAS provides a full revision, incorporating all prior amendments and clarifications, substantial new scientific information that has

² http://www.fs.fed.us/rm/pubs_journals/2016/rmrs_2016_cooke_b003.pdf

emerged since 2000..... Guidance provided in the revised LCAS is no longer written in the framework of objectives, standards, and guide-lines as used in land management planning, but rather as conservation measures. This change was made to more clearly distinguish between the management direction that has been established through the public planning and decision-making process, versus conservation measures that are meant to synthesize and interpret evolving scientific information."³

LCAS continues by addressing the relationship of best available science and existing forest plans as follows:

"Forest plans are prepared and implemented in accordance with the National Forest Management Act of 1976.....**The updated information and understandings in the revised LCAS may be useful for project planning and implementation, as well as helping to inform future amendments or revisions of forest plans.**"⁴

The 2013 LCAS also provides an extensive review of the short, medium and long term impacts of wildfire and restoration activities and clearly identifies that restoration and mitigation efforts may have a short term negative impact on habitat but in the medium and long term frames of review provide significant improves to the quality of the habitat and number of pray species that are available to the species. The 2013 LCAS provides the following summary of restoration efforts, which the Organizations believe is highly relevant to the Lagarita Project:

"Particularly in the Western United States, ecosystem restoration is primarily focused on dry and mesic forest types at lower elevations, rather than in lynx habitat, and includes reestablishing low intensity fires in those systems. Applying ecosystem restoration across a landscape may reduce the risk of uncharacteristic large, stand replacing fires occurring at lower elevation forest types, and thereby prevent their spread into adjacent lynx habitat." ⁵

The 2013 LCSA also provides an excellent summary of how the lack of mitigation and restoration efforts previous have resulted in the current challenges that are currently being faced by forest managers in lynx habitat areas.

³ See, Interagency Lynx Biology Team. 2013. Canada lynx conservation assessment and strategy. 3rd edition. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp. at pg. 2. (Hereinafter referred to as "LCAS").

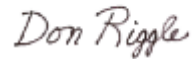
⁴ See, LCAS at pg. 4

⁵ See, LCAS at pg 76.

Conclusion

In closing, please accept these comments as the vigorous support of the Organizations for Alternative 2 of the Proposal. If you have questions please feel free to contact Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com.

Respectfully Submitted,



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