



HIGH COUNTRY CONSERVATION ADVOCATES

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August 28, 2015

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Mr. Scott Armentrout, Forest Supervisor
2250 Highway 50
Delta, Colorado 81416

Re: Comments to the Grand Mesa, Uncompahgre and Gunnison National Forests on the Travel Analysis Report

Dear Mr. Armentrout:

We appreciate the opportunity to provide feedback to the Forest Service regarding the Grand Mesa, Uncompahgre and Gunnison National Forests' (GMUG) Travel Analysis Process (TAP) and Final Travel Analysis Report (TAP Report). The travel analysis process – the first step in complying with subpart A of the Travel Management Rule at 36 CFR 212 – is a very important one. By identifying roads likely unneeded for future use, the Forest Service is establishing a much-needed blueprint for future restoration and access management. As such, High Country Conservation Advocates (HCCA) is committed to ensuring that the TAP Report is as thorough as possible and utilizes a scientifically rigorous analysis to produce recommendations, a list of roads likely unneeded in the future, and a map showing likely needed and unneeded roads. Based on our review, we offer several recommendations that if implemented would enhance the rigor and future utility of the GMUG's TAP Report.

I. Background

To address its unsustainable and deteriorating road system, the Forest Service promulgated the Roads Rule (referred to as "subpart A") in 2001.¹ The rule directs each national forest to conduct "a science-based roads analysis," generally referred to as the "travel analysis process."² The Forest Service Washington Office, through a series of directive memoranda, instructed forests to use the subpart A process to "maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns."³ These memoranda also outline core elements that must be included in each Travel Analysis Report.

The Washington Office memorandum dated March 29, 2012 directed the following:

¹ 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A.

² 36 C.F.R. § 212.5(b)(1). Forest Service Manual 7712 and Forest Service Handbook 7709.55, Chapter 20 provide detailed guidance on conducting travel analysis.

³ Memorandum from Joel Holtrop to Regional Foresters *et al.* re Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Nov. 10, 2010); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management, Implementation of 36 C.F.R. Part 212, Subpart A (Mar. 29, 2012); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management Implementation (Dec. 17, 2013).



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- A TAP must analyze all roads (maintenance levels 1 through 5);
- The Travel Analysis Report must include a map displaying roads that will inform the Minimum Road System pursuant to 36 C.F.R. § 212.5(b), and an explanation of the underlying analysis;
- The TAP and Watershed Condition Framework process should inform one another so that they can be integrated and updated with new information or where conditions change.

The December 17, 2013 Washington Office memorandum clarifies that by the September 30, 2015 deadline each forest must:

- Produce a Travel Analysis Report summarizing the travel analysis;
- Produce a list of roads *likely not needed for future use*; and
- Synthesize the results in a map displaying roads that are *likely needed* and *likely not needed in the future* that conforms to the provided template.

The Rocky Mountain Regional Office supplemented the national direction with regional guidance. The December 21, 2012 document concisely states that the ultimate goal of this process is the “management and sustainability of a road system that minimizes adverse environmental impacts by assuring roads are in locations only where they are necessary to meet access needs, and can be maintained within budget constraints.”⁴ Providing direction on the environmental analysis, the guidance states:

TAPs are expected to especially focus on at risk and impacted watersheds as identified in the recently-completed Watershed Condition Framework. Especially where high road densities on National Forest lands are a major factor in causing these watersheds to be at risk or impaired excess mileage should be recommended for decommissioning.

Finally, relative to the fiscal analysis, it directs that:

Units should consider all expected sources of funding available to maintain the road system to appropriate standards, and include all costs that are required to comply with applicable Best Management Practices (BMPs) for their maintenance. Include associated bridge maintenance and annualized replacement costs (based upon type and length) as well. Units must balance the costs of maintaining the recommended system such that the recommendation is not expected to result in accrual of deferred maintenance on roads and bridges once the TAP is implemented (i.e. there should be a zero balance between anticipated maintenance revenue and anticipated maintenance cost on an annual basis).

- II. TAPs should utilize best available science to evaluate the environmental impacts of the road system.

⁴ USFS, Rocky Mountain Region. Regional Guidance & Expectations, Subpart A Travel Analysis. December 21, 2012.



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Subpart A of the Travel Management Rule (TMR) incorporates the requirements of the 2001 Roads Rule, a rule which was promulgated in recognition of the fact that the Forest Service's transportation system was responsible for declines in ecosystem health and constituted a drain on agency resources.⁵ In order to "minimize and begin to reverse adverse ecological impacts from roads" and be responsive to long-term funding expectations, the TMR requires the Forest Service to assess the risks, problems and benefits associated with each of the roads in the entire system, culminating in the identification of a minimum road system.⁶ Specifically, the Roads Rule requires the Forest Service to identify the minimum road system based on a science-based roads analysis conducted at the appropriate scale. The Forest Service's report *Roads Analysis: Informing Decisions About Managing the National Forest Transportation System* (Report FS-643) provides some of the best direction available to guide efforts under the TMR, including a description of what the agency means by "science-based":

Roads analysis is intended to be science based. That is, analysts should locate, correctly interpret, and use relevant existing scientific literature in the analysis. They should disclose any assumptions made during the analysis, and reveal the limitations of the information on which the analysis is based. Finally, the analysis report should be subjected to critical technical review.⁷

To that end, it is important that the GMUG in its TAP Report document the scientific basis for the criteria it uses to assess risk and benefits, and disclose assumptions and data limitations. Two years ago, The Wilderness Society compiled a literature review that surveys the extensive and best-available scientific literature (including the Forest Service's 2000 General Technical Report synthesizing the scientific information on forest roads)⁸ on a wide range of road-related impacts to ecosystem processes and integrity on National Forest lands.⁹

For example, erosion, compaction, and other alterations in forest geomorphology and hydrology associated with roads seriously impair water quality and aquatic species viability.¹⁰ Roads disturb and fragment wildlife habitat, altering species distribution, interfering with critical life functions such as feeding, breeding, and nesting, and resulting in loss of biodiversity.¹¹ Roads also facilitate increased human intrusion into sensitive areas, resulting in poaching of rare plants and animals, human-ignited wildfires, introduction of exotic species, and damage to archaeological resources.¹²

⁵ 66 Fed. Reg. 3,206, 3,209, 3,214 (Jan. 12, 2001).

⁶ *Id.* at 3,214-15.

⁷ U.S.D.A. Forest Service, *Roads Analysis: Informing Decisions About Managing the National Forest Transportation System*, Misc. Report FS-643, Washington, D.C. (Aug. 1999) at 2.

⁸ Hermann Gucinski *et al.*, *Forest Roads: A Synthesis of Scientific Information*, Gen. Tech. Rep. PNW-GTR-509 (May 2001), available at <http://www.fs.fed.us/pnw/pubs/gtr509.pdf>.

⁹ Attachment I.

¹⁰ See Attachment I at 2-4.

¹¹ See Attachment I at 4-6.

¹² See Attachment I at 6, 9 & Att. 1.



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Climate change intensifies the adverse impacts associated with roads. For example, as the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience.¹³ Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes.¹⁴ Many National Forest roads, however, were not designed to any engineering standard, making them particularly vulnerable to these climate alterations. And even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs.¹⁵

We have attached the literature review to provide a summary of current scientific thinking related to forest roads. As you finalize your TAP Report, we urge you to use it and other scientific sources to guide the risk/benefit analysis and identification of roads likely unneeded.

III. Positive Aspects of the TAP Report

We are pleased that the agency included motorized trails and ML1 roads in its road density calculations. As we have long advocated, incorporating this subset of the Forest Service route system gives a more accurate picture of risks to wildlife and water resources. We also appreciated the information provided on high risk roads on pages 7 and 8.

IV. Concerns with the TAP Report

We reviewed the TAP report with an eye to whether the GMUG applied the appropriate criteria to assess risk and benefit and identify roads likely unneeded, and utilized best available science. Based on our review, we have the following concerns: (1) that the TAP Report did not rank benefits on a scale from high to low, but rather simply stated if a road was beneficial or not, (2) that criteria for measuring risk were incomplete and not reflective of the best available science, (3) that despite 433 miles of high risk roads, relatively few miles of these roads are recommended for closure, and (4) the TAP Report does not demonstrate how the GMUG can maintain a fiscally sustainable transportation system. In addition, we provide a short list of individual routes that we believe warrant further examination by the agency.

Also of concern is the TAP Report's bullet point list of issues (Step 3). This step is the agency's opportunity to identify major issues, identify data that will be used to analyze the issues and, if such data is not available, how it will be collected. The GMUG TAP Report's discussion of issues is skeletal at

¹³ See Attachment I at 9-14; see also USDA, Forest Service, *National Roadmap for Responding to Climate Change*, at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf> (recognizing importance of reducing fragmentation and increasing connectivity to facilitate climate change adaptation).

¹⁴ See Attachment I at 9.

¹⁵ See USDA, Forest Service, *Water, Climate Change, and Forests: Watershed Stewardship for a Changing Climate*, PNW-GTR-812, at 72 (June 2010), available at http://www.fs.fed.us/pnw/pubs/pnw_gtr812.pdf.



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best, limited to: (1) Identify a transportation system necessary for the management of the GMUG National Forest, (2) Provide motorized recreation opportunities, (3) High risk roads require a greater need for maintenance to mitigate impacts, and (4) Road maintenance budgets are anticipated to decline. Nowhere is there any discussion of issues related to minimizing environmental impacts, reflecting long-term cost considerations associated with the road system, or the adequacy of the road system in meeting forest management and recreation needs. Without consideration of these fundamental issues, it is questionable whether the TAP Report can lay the foundation for an environmentally and fiscally responsible road system on the GMUG.

A. Benefits Analysis Lacks Depth and Needed Detail

The TAP Report includes a limited analysis of the benefits of each road. Instead of assigning a numerical value for the benefit as most forests did, the GMUG simply said if the road had a benefit or did not. This approach undermines the entire point of the TAP, namely to analyze and compare the costs and benefits of each road at the appropriate scale in order to inform the identification of the minimum road system. With only a yes or no in the benefits column, it is very hard to understand the degree to which a road provides a benefit and therefore provide useful recommendations for future action.

For example, Appendix B, item B1 states that a road that is within .1 mile of a range feature such as a fence is considered to have benefit. This seems overly general and imprecise since many roads might come within .1 mile of a range improvement but not be necessary for existing and potential grazing permits. It would be much better to 1) identify whether the road is actually needed and to what degree, and 2) identify whether the road is redundant and hence potentially unneeded. Similarly, item B2 says that ML 1-5 roads “accessing mineral activities such as those consistent with 1872 Mining Law, rock quarries or mineral research activities” are beneficial. Again, this is overly general and imprecise and hence not helpful in actually describing the benefit of roads. Further, Item C4 is also overly general and imprecise. It confers a ranking of beneficial to roads that provide a motorized opportunity as defined by the existence of a motorized trail (where? Within a certain distance?), a recreation corridor (what is this?), or within .1 mile of a motorized backcountry area. These metrics are so general that they provide no understanding of the actual benefit a road might confer.

In addition, the benefits analysis is based on a GIS exercise and not on field-checking or on the expertise of forest staff. The GIS exercise provides a great starting point, but certainly is not adequate in and of itself. For example, if a road at any point is within .1 mile of a range improvement it automatically is conferred a ranking of beneficial. We can think of plenty of roads within .1 mile of a fence that are not needed for the maintenance of that fence.

B. Risk Analysis Lacks Depth and Needed Detail

We are concerned that the risk analysis lacks depth and detail and is not scientifically grounded. First, we are surprised that the GMUG only considered three risk factors in its risk assessment. These are sedimentation, water resources, and wildlife. We point you to our letter dated April 14, 2014 where we



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articulated additional risk factors that we thought should be assessed. Additionally, Forest Service Technical Report 643 suggests a number of risk factors for consideration in roads analyses, such as:

Ecosystem Functions and Processes (EF)

- What ecological attributes, particularly those unique to the region, would be affected by roading of currently unroaded areas? EF (1)
- To what degree do the presence, type, and location of roads increase the introduction and spread of exotic plant and animal species, insects, diseases, and parasites? What are the potential effects of such introductions to plant and animal species and ecosystem function in the area? EF (2)
- To what degree do the presence, type, and location of roads contribute to the control of insects, diseases, and parasites? EF (3)
- How does the road system affect ecological disturbance regimes or landscape level processes in the area? EF (4)
- What are the adverse effects of noise caused by developing, using, and maintaining roads? EF (5)

Aquatic, Riparian Zone, and Water Quality (AQ)

Watershed and upper catchment processes

- How and where does the road system modify the surface and subsurface hydrology of the area? AQ (1)
- How and where does the road system generate surface erosion? AQ (2)
- How and where does the road system affect mass wasting? AQ (3)
- How and where do road-stream crossings influence local stream channels and water quality? AQ (4)
- How and where does the road system create potential for pollutants, such as chemical spills, oils, de-icing salts, or herbicides to enter surface waters? AQ (5)
- *How and where is the road system 'hydrologically connected' to the stream system? How do the connections affect water quality and quantity (such as delivery of sediments, thermal increases, elevated peak flows)? AQ (6)*

Affected values and lower catchment processes and influences

- What downstream beneficial uses of water exist in the area? What changes in uses and demand are expected over time? How are they affected or put at risk by road-derived pollutants? AQ (7)
- How and where does the road system affect wetlands? AQ (8)
- How does the road system alter physical channel dynamics, including isolation of floodplains; constraints on channel migration; and the movement of large wood, fine organic matter, and sediment? AQ (9)
- How and where does the road system restrict the migration and movement of aquatic organisms? What aquatic species are affected and to what extent? AQ (10)
- How does the road system affect shading, litterfall, and riparian plant communities? AQ (11)
- How and where does the road system contribute to fishing, poaching, or direct habitat loss for at-risk aquatic species? AQ (12)



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- How and where does the road system facilitate the introduction of nonnative aquatic species? AQ (13)
- To what extent does the road system overlap with areas of exceptionally high aquatic diversity or productivity, or areas containing rare or unique aquatic species or species of interest? AQ (14)

Terrestrial Wildlife (TW)

- What are the direct effects of the road system on terrestrial species habitat? TW (1)
- How does the road system facilitate human activities that affect habitat? TW (2)
- How does the road system affect legal and illegal human activities (including trapping, hunting, poaching, harassment, road kill, or illegal kill levels)? What are the effects on wildlife species? TW (3)
- How does the road system directly affect unique communities or special features in the area? TW (4)

Second, for the risk factors considered in the TAP Report, we see no linkage between the metrics and risk factors in the risk assessment chart provided in Appendix A and the current scientific literature. As discussed above in Section II, Subpart A of the Travel Management Rule and related policy direction call for a science-based analysis which requires locating, correctly interpreting, and using relevant scientific literature, as well as disclosing assumptions and data limitations. We discuss each of the three risk factors considered in the report below.

i. Sedimentation

The TAP Report considers only road density and maintenance level in its analysis of sedimentation risks. While these are good factors to consider, other factors are often considered including stream crossing density,¹⁶ soil types, slopes, potential for mass wasting, and road-stream proximity. See literature review starting on page 2.

Other National Forests have expanded sedimentation metrics to achieve a more realistic understanding of the risks of individual routes and collective systems. For example, the Clearwater National Forest used four factors to determine sources of sedimentation: drainage density (i.e. how well or how poorly a watershed is drained by stream channels), road-stream proximity, road-stream intersections, and road density. The analysis combines these factors to determine which watersheds are most at risk for surface erosion and sediment delivery to streams.¹⁷

Sediment delivery was used as a risk criterion in the Cibola – Mountainair TAP. In that process, a road was considered high risk if more than 100 feet of the road or motorized trail on severe erosion potential

¹⁶ Roads are by far the greatest source of sediment to streams in developed forest watersheds. See <http://proceedings.esri.com/library/userconf/proc97/proc97/to500/pap457/p457.htm>. This sediment is delivered to streams mainly at stream crossings, making stream crossings a potentially useful and easily-measured predictor of sediment delivery to watercourses.

¹⁷ Clearwater National Forest, *Roads Analysis Report*, at 25.



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soil is in “close proximity” to a stream¹⁸, or the road crosses a stream channel two times or more, or the road or motorized trail rates as medium risk, but is within a known fishery.¹⁹

ii. Water Resources

The TAP Report’s analysis of water resource risks examines roads’ proximity to water and stream crossings per mile. It is not clear what scientific basis was used to set the high, moderate, and low risk thresholds for the stream crossings per mile. Is there a basis for the 5 crossings/mile threshold (which seems quite high) for high risk?

iii. Wildlife

Roads and trails impact wildlife through a number of mechanisms including: direct mortality (poaching, hunting/trapping) changes in movement and habitat use patterns (disturbance/avoidance), as well as indirect impacts including alteration of the adjacent habitat and interference with predatory/prey relationships. Some of these impacts result from the road itself, and some result from the uses on and around the roads (access). Ultimately, roads have been found to reduce the abundance and distribution of several forest species. See literature review, starting on page 4.

The TAP Report appears to arbitrarily limit its wildlife risk analysis to three measurements: open roads densities within critical summer wildlife range, elk summer range and sage-grouse habitat. This narrow focus misses the opportunity to realistically examine the impacts of the GMUG’s network of roads on its diverse and economically important wildlife species and their habitats. We would like to see the TAP Report look at these criteria, and also examine the equally important factors of habitat fragmentation and connectivity, forest-wide road densities (as opposed to select geographic areas), and climate change. We also reiterate our request made in our April 14, 2014 letter that the TAP Report include additional wildlife and wildlife habitat, instead of relying only upon road density in big game summer range and sage-grouse habitat. Finally, the TAP Report should include an analysis of individual routes rather than just road density to assess risk.

The TAP Report sets a threshold for open road density within limited wildlife habitats as greater than 2.4 miles per square mile for high risk roads, which seems potentially excessive based on the information in the attached literature review (See pages 6-8). We ask that you utilize the current scientific literature in identifying road density thresholds for specific species of concern on the GMUG. If you are setting one threshold overall to determine risk levels (as opposed to setting a threshold for each species), you should use the most conservative value.

In addition to the limited number of species assessed (ungulate summer range, sage grouse habitat), the GMUG needs to also analyze road densities for Canada lynx, black bear, Colorado River cutthroat trout,

¹⁸ “Close proximity” is defined as: For all mapped streams, 50’ either side of an intermittent/ephemeral channel or 75’ either side of a perennial channel; For water quality impaired reaches, 100’ either side of intermittent/ephemeral channels within the impaired watershed or 300’ either side of a perennial channel.

¹⁹ Cibola National Forest - Mountainair TAP, at 25.



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goshawk, boreal toad, mule deer and bighorn sheep. In terms of looking at road densities in specific habitats, this approach makes sense to better assess the impacts of roads on specific species' habitats. To this end, the GMUG should also consider big game winter range and wildlife corridors. However, the GMUG should apply road density thresholds across the entire forest to capture the risk of higher road densities for species that roam the entire forest and for other species not specifically called out in the risk assessment chart but still affected by habitat changes and uses related to roads. See literature review pages 3-8.

While density is a good landscape level metric, it cannot capture the localized risk that individual roads and road segments pose to a species. We think this is particularly important in especially sensitive habitat and wildlife areas. We request that the GMUG consider the risk that individual roads pose to select species and sensitive habitat. Again, we direct you to our April 14, 2014 letter for specific suggestions.

C. Climate Change

Climate change will affect the condition of the GMUG's infrastructure and the risks it poses to forest resources and users. Climate change will affect precipitation and hydrologic patterns that will strain infrastructure at times to the breaking point resulting in damage to streams, fish habitat, and water quality as well as threats to public safety. Climate change will also force movement of species as they try to adapt, which may heighten the risk of fragmentation from roads on habitats and species. See literature review pages 8-13. Although difficult, the GMUG needs to consider changes to the risks assessment under foreseeable climate change scenarios. Moreover, the GMUG needs to heavily consider climate change in its fiscal analysis and recommendations for future road management in the TAP Report.

D. User Conflict

The TAP Report's risk analysis does not consider user conflicts exacerbated by roads. User conflict is an increasing problem on the GMUG as greater numbers of people utilize roads and trails for different recreation objectives. Other National Forests have included user conflict metrics in their risk analysis. For example, in its route-by-route risk/value assessment, the Tusayan Ranger District of the Kaibab National Forest noted that roads in ROS semi-primitive non-motorized areas and Inventoried Roadless Areas create user-conflicts between non-motorized and motorized users. As such, the Tusayan determined that "roads that encroach upon ROS semi-primitive non-motorized or inventoried roadless areas are high risk. Roads that are outside of designated areas are lower risk."²⁰

²⁰ Kaibab National Forest, *Tusayan Ranger District TAP*, at 22, 34.



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E. Roads Not Needed

It is unclear how the GMUG arrived at its list of roads deemed not needed. The Washington Office (WO) issued a memorandum on December 17, 2013 that directed units to, among other things, identify a list of roads that are “likely not needed for future use.” We are concerned about the limited set of roads that the GMUG is considering as likely not needed for future use. Even though the TAP Report identifies 433 miles as High Risk (94% of which are ML 2 roads), only 43 miles of High Risk ML 2 roads are determined to be not needed.²¹ It is difficult to conceive how the Forest Service can meet its fiscal and environmental objectives while allowing the vast majority of High Risk roads to remain on the landscape as a continual drain on agency resources.

It should be noted that the charts on pages 7 and 8 of the TAP Report have inconsistent numbers. Also, the chart on page 1 appendix D has a different number for existing system miles than the charts in the TAP report (3714 miles versus 3723 miles), and page D-2 figure for unneeded roads is not the same number cited in TAP report (366 vs 380).

We reiterate that roads where no compelling administrative or public need exists in the short or long-term should be decommissioned and reclaimed regardless of the risk score. This is important because although an individual road may not have a high risk score, cumulatively a large concentration of roads, whether high or low risk, can cause substantial impacts on habitat or water quality. Moreover, low benefit roads sap resources from higher benefit roads. By reducing the size of the road system, the Forest Service will be able to focus resources on higher benefit roads providing more reliable and safer access overall.

F. Finances and Maintenance

The Rocky Mountain Office’s Regional Guidelines emphasize that subpart A analysis is intended to account for benefits and risks of each road, and especially account for affordability. It is unclear how the road system identified in the TAP Report, a majority of which has been identified as “likely needed,” meets the requirement of a road system that “reflect[s] long-term funding expectations.”²² We ask that the GMUG complete a comprehensive fiscal analysis and identify management opportunities based on the results of the fiscal analysis. Reviewers of the TAP Report and attachments cannot tell in reading Appendix D (Finances) what the annual road revenues are, what the fiscal gap is now and post implementation of recommendations, what the deferred maintenance cost is.

Maintenance costs associated with the high risks roads are not addressed in the TAP Report. Given the relatively few miles of roads to be closed under the TAP Report, we are concerned about maintenance of the road system. The Gunnison National Forest is currently struggling to maintain top priority routes

²¹ GMUG National Forests, *Final Travel Analysis Report* (June 2015), at 7-8.

²² 36 C.F.R. § 212.5(b)(1).



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such as the Gothic Road.²³ We are pleased to note and thankful for the Forest Service's recent maintenance activities along the Cement Creek road. This work is critical, especially leading into the busy hunting season. However, there are still outstanding issues along this route and other high-impact roads that need to be addressed every year.

In addition, FOIA-released documents from the GMUG indicate very slow progress by the agency on the Gunnison National Forest. It appears that in FY 2014, the agency accomplished 13 miles of road maintenance in the east zone of the Gunnison Ranger District, and implemented one mile of work from the Travel Management Plan.²⁴ In this light, the TAP Report's small number of recommended road closures appears fiscally irresponsible.

V. Future Actions

Once the TAP report is complete, the Forest Service has a variety of ways to implement its recommendations through different projects. We urge that projects analyzed under NEPA contain a purpose and need statement to improve sustainability of the motorized transportation system and includes all TAP report recommendations for the project area. We also urge line officers to conduct a landscape scale project to restore lands and waters from road impacts by proposing to implement all TAP report recommendations within the project area. Finally, it is our understanding that the GMUG will be initiating Forest Plan revision shortly. As this begins, we ask that the TAP report is included in the assessment phase, and is used to help inform the revision process.

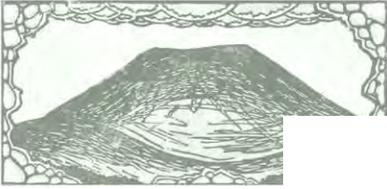
VI. Specific Roads and Trails (Gunnison National Forest Only)

Our recommendations include both roads and motorized trails, as the TAP Report posits risk ratings for both, and National Forest System trails receiving motorized travel were incorporated into the Risk assessment, specifically road density calculations.

- Taylor Pass – 7761
 - We disagree with the Moderate Risk assessment for this route in the TAP Report. For more information, please see our April 14, 2014 comments.
- Carbon Trail – 9436
 - We disagree with the Low Risk assessment for this route in the TAP Report. For more information, please see our April 14, 2014 comments.
- Williams Pass – 9298
 - We agree with the High Risk assessment for this route in the TAP Report, but continue to advocate for its closure. For more information, please see our April 12, 2014 comments.
- From the Top of Paradise Divide to Schofield Pass – 7734

²³ See <http://crestedbuttenews.com/2015/08/discussion-on-use-of-backcountry-to-be-held-in-gothic/>.

²⁴ Attachment II.



- We disagree with the Moderate Risk assessment given this route. For more information, please see our April 14, 2014 comments.
- Poverty Gulch/Lower End of Daisy – 7552
 - We disagree with the Moderate Risk assessment in the TAP Report. For more information, please see our April 14, 2014 comments.
- Waterfall Trail – 9555
 - We disagree with the Moderate Risk assessment in the TAP Report. For more information, please see our April 14, 2014 comments.
- Crest Trail – 9531
 - This trail is part of the nationally-known Continental Divide National Scenic Trail, which is, subject to certain limitations, open to non-motorized uses only. We are aware of user conflicts associated with this trail. As such, we disagree with the Low Risk assessment in the TAP Report for this trail.
- Block and Tackle – 9545
 - Considerable environmental damage has occurred on this trail due to motorcycle use. Motorized use is currently leading to resource damage and impacts to recreation opportunities. We disagree with the Moderate Risk assessment in the TAP Report for this trail.
- Cameron Gulch – 9549
 - This trail crosses high marshes and has received extensive environmental degradation due to motorized use. We disagree with the Moderate Risk assessment in the TAP Report for this trail.
- Gold Creek – 9427
 - This trail crosses high marshes and has received extensive environmental degradation due to motorized use. We disagree with the Moderate Risk assessment in the TAP Report for this trail.
- Fairview - 9426
 - This trail crosses high marshes and has received extensive environmental degradation due to motorized use. We disagree with the Low Risk assessment in the TAP Report for this trail.
- Bear Gulch – 9610
 - This trail is motorized in an area comprised of motorcycle routes that run parallel to each other, rendering the trail redundant. We disagree with its Low Risk rating in the TAP Report.

VII. Conclusion

Travel analysis should be a science-based analysis that assesses the risks and values for each road. This analysis then provides line officers with necessary information to make informed decisions and develop motorized systems that are safe and responsive to public needs and desires, are affordable and



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efficiently managed, have minimal negative ecological effects, and are in balance with available funding. We hope that the Forest Service is able to finalize a TAP Report that reflects these needs.

Thank you for your consideration of these comments.

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