



June 28, 2017

TO: U.S. Department of Interior
Office of Hearings and Appeals
Interior Board of Land Appeals
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CC: Regional Solicitor
Rocky Mountain Region
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Statement of Reasons: DOI-BLM-CO-S060-2016-0022-EA

IBLA DOCKET #: IBLA-2017-0223

I. Introduction

Our organizations represent backcountry skiers, splitboarders, cross-country skiers, ice climbers, snowmobilers, snowshoers, mountaineers and others who recreate, view wildlife, sightsee and otherwise gain benefit from and enjoy the Silverton area.

San Juan Citizens Alliance (SJCA) has been working in Southwest Colorado since 1986, and has an established record of success in building and implementing effective campaigns and collaborate stakeholder processes that address important public lands, water quality and quantity, ecological health and restoration, economic sustainability, and energy development concerns. Our dedication to community-based advocacy and organizing has earned the organization respect

in local communities. SJCA has worked in numerous partnerships with federal agencies, local governmental entities and other non-profits in the protection and restoration efforts looking to the long-term health of our natural and human communities.

The Backcountry Snowsports Initiative (BSI) is a program of the Colorado Mountain Club (CMC) designed to protect human-powered winter recreation for skiers, snowshoers, snowboarders, mountaineers and other users, while protecting the wild lands that support these activities. BSI works with federal land management agencies, recreational clubs, and concerned human-powered backcountry users in developing collaborative winter management solutions for Colorado's famous backcountry. We represent a diverse group of stakeholders including recreational users, business owners, and environmental groups who want to ensure that winter use of public lands remains safe and sustainable in Colorado. BSI maintains an electronic mailing list of over 1,200 supporters and has an extended network of over 20,000 winter recreation enthusiasts. BSI and CMC are also representatives of Outdoor Alliance Colorado and the Southern Rockies Conservation Alliance which include a host of human-powered recreation groups and environmental groups, respectively.

Winter Wildlands Alliance (WWA) is a national non-profit organization, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Formed in 2000, WWA has grown to include 32 grassroots groups in 13 states – including several in Colorado – and has a collective membership exceeding 50,000. WWA members and supporters in southwest Colorado, and across the country, deeply value the world-class backcountry skiing opportunities offered in the Silverton area. Many of our members also ski at the Silverton Mountain ski area and enjoy heli-skiing. Our previous comments are included as Appendix A.

SJCA, CMC, and WWA (collectively “Appellants” or “we”) are not opposed to heli-skiing, and we want to see Silverton Mountain ski area and Silverton Guides succeed and thrive. However, we do not support the terrain expansion approved by the Gunnison Field Office. Our Statement of Reasons follows our Notice of Appeal (May 31, 2017) of the decision made by the Bureau of Land Management (BLM) Gunnison Field Manager Elijah Waters on May 3, 2017. Mr. Waters signed the Decision Record, “It is my decision to implement the Proposed Action described in the Environmental Assessment for the Silverton Guides Helicopter Ski Terrain Exchange” (DOI-BLM-CO-S060-2016-0022-EA).

The decision is adverse to our organizations and members because the Gunnison Field Office approval of the Silverton Guides terrain expansion associated with their Special Recreation Permit will cause detrimental effects to the human environment during their winter use of the BLM lands in San Juan County, Colorado.

The decision substantially affects the activities of private citizens and other permitted outfitters because they will be subjected to activities and circumstances (intended and otherwise) that could include avalanches, impacts from avalanche control activities (use of explosives), noise and visual disturbances, disruption of travel plans and itineraries, and other possible outcomes. As well, the natural environment (include animal and plant species) and the historic/cultural environment are at risk by the significant increase in permitted heli-skiing terrain on the public lands of San Juan County.

We believe that the decision is incorrect and based upon an incomplete and erroneous National Environmental Protection Act process including a lack of analysis and adequate consideration of public comments. We ask that the Interior Board of Land Appeals make a determination that this NEPA be declared invalid and set aside.

This Statement of Reasons is to accompany our Notice of Appeal of the decision made by Bureau of Land Management (BLM), Gunnison Field Manager, Elijah Waters, submitted May 31, 2017. On May 3, 2017, Mr. Waters signed a Decision Record, “to implement the Proposed Action described in the Environmental Assessment for the Silverton Guides Helicopter Ski Terrain Exchange” (DOI/BLM-CO-S060-2016-0022-EA).

II. Decision Being Appealed

The Decision is to, “implement the Proposed Action described in the Environmental Assessment for the Silverton Guides Helicopter Ski Terrain Exchange (DOI-BLM-CO-S060-2016-0022-EA), with these additions. Three additional project design criteria were indicated to be applied to the Proposed Action:

1. No use of explosives in the SRP area will be allowed after 9:00 a.m.
2. No use of explosives will be allowed at any time in the identified closure area in the Southeast Pod for the purposes of snow stability assessments related to heli-skiing.
3. No Landing Zones or skier drop-offs will be allowed in the identified closure area in the Southeast pod.

III. Statement of Reasons

INADEQUACY OF NATIONAL ENVIRONMENTAL POLICY ACT PROCESS

At numerous junctures in the National Environmental Policy Act (NEPA) process the Gunnison Field Office (GFO) failed to meet the statutes, standards and spirit of NEPA. The following outline provides an overview of the shortcomings of the NEPA process for BLM-CO-S060-2016-0022-EA that are detailed within the Discussion and Findings section.

1. The GFO mischaracterized the environmental analysis proposal as an “exchange” of acreage to be utilized by Silverton Guides within their Special Recreation Permit (SRP).
2. The GFO failed to provide the required adequate range of alternatives in the Preliminary Environmental Assessment (EA).
3. The GFO failed to provide the required and adequate information to the public that is necessary to support the public in providing informed and substantial comments on the Preliminary EA.

4. The GFO failed to provide essential documents to the public for their review and on which to base their comments. These documents were not made available to the public until the Decision Notice was signed and the Final EA was publicly released and posted online.
5. The GFO dismissed and negated the public comment process and the comments submitted by:
 - a. Failing to address and analyze substantive issues raised by the public during the scoping process, and
 - b. Failing to accurately and professionally record and subsequently make available to the public comments submitted during both the scoping comment period and the comment period on the Preliminary EA, and
 - c. Failing to assess and recognize the legitimacy and quantity of public comments recommending that the GFO either choose the No Action Alternative or significantly modify the Proposed Action.
6. The GFO issued a Decision Notice that failed to address numerous significant issues generated during the scoping process and subsequently reiterated within public comments on the Preliminary EA and errantly issued a Finding of No Significant Impact.

Discussion and Findings

1. The GFO mischaracterized the proposal as an “exchange” of acreage to be utilized by Silverton Guides within their Special Recreation Permit (SRP). Rather, the Proposed Action was a significant increase of acreage potentially available to the proponent for their heli-ski operations.

The Gunnison Field Office erroneously titled the Silverton Guides SRP NEPA process the “Environmental Assessment for the Silverton Guides Helicopter Ski Terrain Exchange.” This title generated a misleading and inaccurate interpretation that the EA involved the analysis of an exchange of similarly sized permitted lands to be utilized by Silverton Guides (SG) under their SRP. “Exchange” implies a generally equal trade in which the number of acres being relinquished by SG would be replaced, or exchanged, for a similar number of acres for their future SRP use. However, the acreage proposed by SG and approved by the GFO in the Decision Notice were not at all an exchange, rather they were a very significant expansion to the SRP. As proposed and allowed, Silverton Guides would relinquish only 5,566 acres while adding 16,252 acres which results in an addition of 10,686 acres, or approximately 16.7 square miles, to their SRP. This additional terrain results in a permit size increase of more than 42%. Clearly this is a very significant expansion of their permitted terrain, and not an “exchange” which is defined as an equivalent trade.

2. The Gunnison Field Office failed to provide the required range of alternatives in the Preliminary Environmental Assessment (EA).

The Preliminary EA is deficient of the required range of alternatives required by NEPA with its inclusion of only two alternatives, the No Action alternative and the Proposed Action alternative. If the Silverton Guides SRP permit reissuance was simply focused on a confirmation of the same terrain and the same amount of permitted acreage for their heli-skiing operation, than the circulation of only these two alternatives to the public for their review would be entirely appropriate. However, because the Proposed Action involves a much wider scope of issues than the direct reissuance of the SRP entails, providing only two alternatives is not warranted and does not follow NEPA standards.

The two alternatives provided are starkly different from one another and represent no gradation in the possible choices available to the public upon which to comment. Hypothetically, a citizen NEPA commenter who was highly informed could conceivably consider many of the SRP-related management issues and submit comments that would constitute a possible third, or even fourth alternative. Certainly there is sufficient variation within the terrain and management issues related to this SRP to make this plausible. However, it is the BLM's responsibility as clearly defined in NEPA, to provide a range of alternative rather than citizen commenters to constitute one from the myriad of issues detailed during the scoping phase of the process. As the Preliminary EA was submitted to the public, the commenter was only given the option to choose from the two stark choices, the No Action alternative which would maintain all Silverton Guides' operations "as is" and the full expansion (delineated in the Proposed Action) promoted by the outfitter that represents a 42% increase in operational terrain. Clearly there is none of the diversity of choice required by NEPA and therefore this EA is significantly flawed.

The GFO had sufficient opportunity to develop one or more additional alternatives that could have been entirely based upon the 300+ pages of pithy and diverse comments offered by the public during the scoping period. Unfortunately the GFO, and/or the NEPA contractor developing the Preliminary EA, ignored the rich suggestions offered by public land users, avalanche experts, retired recreational managers, local residents, and others within the approximate 130 scoping comments and instead submitted to the public a deficient and unacceptable EA that did not meet NEPA requirements. Clearly many of the comments were substantive in nature as defined by statute and could have been utilized in the preparation of the Preliminary EA as is indicated in CEQ 40 CFR1503.4.

As an example, the scoping comment letter suggesting a "setback" of 2.5 air miles from maintained winter roads as a possible heli-ski operational area to avoid user conflicts and to address safety concerns was ignored by the GFO as an alternative that could have added a viable alternative to the EA. Similarly, in our comments we suggested that the BLM work with Silverton Guides to identify new pods for expansion that would provide the terrain SG is seeking but would be located further afield, away from areas accessed by people on foot or snowmobile in order to reduce or eliminate user conflict. This idea was also ignored by the GFO.

3. The GFO failed to provide the required and adequate information to the public that is necessary to support the public in providing informed and substantial comments on the Preliminary EA.

It is incumbent on the BLM to provide the public with the necessary background information including specifically relevant documents to support the public's ability to understand, research and comment upon on NEPA processes. In particular, documents that are referenced within an Environmental Assessment should be readily available simultaneous to the release of the EA – the public should not be forced into the role of searching online, traveling to the agency office, or going elsewhere for relevant documents that should be easily and timely obtainable.

Specifically, the Preliminary EA was released to the public on November 10, 2016. Within the EA several documents were referenced that were not made available to the public at the same time despite the reality that all of these documents were critical to a thorough understanding of the Preliminary EA. Our review indicates there were five documents withheld from the public simultaneous to the online posting of the Preliminary EA, they are the Biological Assessment, Scoping Comments, Summary of Scoping Comments, Heli-trax EA and Decision Record (2008), and the Alpine Triangle Recreation Area Management Plan EA with Appendices and Decision Record (2010).

Whether it was an intentional act, inadequate oversight, and/or a technical glitch, this withholding of documents is yet another example of this inadequacy of this NEPA process and how the public interest and opportunity for involvement was disrespected and poorly served.

4. The GFO failed to provide essential documents to the public for their review and on which to base their comments. These documents were not made available to the public until the Decision Notice was signed and the Final EA was released and posted online.

The GFO failed to provide the Biological Assessment and U.S. Fish and Wildlife Service Concurrence document to the public until the Decision Notice was signed and the Final EA made available to the public on May 3, 2017. The Preliminary EA was released to the public on November 10, 2016. On November 15, 2016 at the “open house” hosted by the GFO in Silverton to provide information to the public on the NEPA process SJCA inquired as to the status of the Biological Assessment and learned from a GFO employee that the BLM was “waiting” for the return of the Biological Assessment from the Fish and Wildlife Service (FWS). We understood this to mean that the document would soon be forthcoming and made available to the public as it was “in process.” On November 28, 2016 SJCA submitted a letter (see Appendix B) to the GFO expressing concern that the Biological Assessment was not available for public review during the comment period for the Preliminary EA and therefore the public could not possibly understand and benefit from the FWS's analysis and input on imperiled species issues as related to the Proposed Action.

Despite the importance of this document, it was not made available to the public until the completion of the NEPA process when it was posted online with the Final EA and Decision Notice on May 3, 2017. Due to this timing, the public was never given the opportunity to read and review the Biological Assessment until the NEPA process concluded despite the proposal's intention to expand the permitted territory by more than 42%. In our experience with NEPA, Biological Assessments are commonly released early in the NEPA process that allows both the public to comment upon the document and the agency's use/reliance on the document, and also enhances confidence that the Assessment's information and findings were utilized by the BLM during the NEPA process.

5. The Gunnison Field Office dismissed and negated the public comments submitted during the scoping phase and Preliminary Environmental Assessment:

- a) The GFO failed to address and analyze substantive issues raised by the public during the scoping process.

The scoping process was hosted by the Tres Rios Field Office (TRFO) during the summer of 2015 at which time the TRFO had jurisdiction over BLM lands in San Juan County, Colorado, 86% of which consists of public lands. The scoping process resulted in the submission of approximately 130 comment letters totaling more than 300 pages (see Appendix C: Silverton Scoping Comments Combined). Our experience indicates that this is a voluminous amount of scoping letters considering that they relate to the issuance of a Special Recreation Permit for a business utilizing only 600 user days within a very small county (population 720 as of 2014).

A review of these comments provides a wealth of insight into the interests, activities and expertise of the citizen commenters. We observed that many know the topography of the SRP area, are active users of this territory, and have "more than casual" knowledge of many of the critical management-related issues such as avalanche safety, backcountry guiding, common challenges of the southwest Colorado snowpack and its associated weather, and winter user conflicts. For the most part the comments indicate that these were highly motivated and informed commenters with very individualized comments that were substantive in their status.

Due to the "richness" of these comments, the GFO was given the excellent opportunity to draw from them a solid and extensive footing of the diversity of important issues that could have been investigated in the NEPA process – indeed, the GFO is required by NEPA to address all of the substantive issues brought forth during the scoping. Unfortunately, they failed to do so, and lacking such an apparent interest and commitment produced a woefully inadequate EA with an incompetent pursuit of the important issues delineated in the scoping comments. The user conflict issue and road closures issues (detailed below) are two

examples of issues that were handled inadequately in the “transition” from the scoping process to the development of the Preliminary EA.

- User Conflicts. The user conflict issue is repeatedly raised in comment submissions, in fact, it is likely the predominant issue brought forth by commenters that include backcountry skiers, ice climbers, snowmobilers, and others. Despite this high level of interest and concern expressed by the public, the Preliminary EA only mentions “user conflicts” twice within its 63 pages - on page 18, “Minimal user conflicts would continue throughout the SRP.” and on page 19, “Heli-skiing in the proposed pods would result in increased opportunity for user conflicts.” As can be discerned from these two references, the GFO gives only passing reference to this critical land management concern and completely fails to investigate the issue and therefore subsequently fails to address it in the Final EA and Decision Notice.
- Road Closures/Avalanche Control Activities. The very significant issue regarding the possible closure of San Juan County roads #2 and #110 is not adequately addressed in the NEPA process. The possibility of roads being closed due to avalanche control activities or unintended triggering of avalanches by Silverton Guides heli-skiing operations would be disruptive to both residents of and visitors to San Juan County. Certainly this is both a safety concern and a logistical concern for travelers on these two roads as well to those whom reside or own businesses on these routes. It is also a financial issue due to the expense to either Silverton Guides, and/or San Juan County, and/or private citizens and businesses whose activities could be interrupted and therefore could conceivably bear a financial burden due to roads closed by there avalanches. This issue is noted in SJCA’s second comment letter on the Preliminary EA (see Appendix I).

Amongst the commenters noting a concern about user conflicts inherent in the Proposed Action is the letter from one of the five other currently permitted and winter-use oriented Special Recreation Permit holders (Kling Mountain Guides) in San Juan County. Despite the fact that the Silverton Guides proposal would likely adversely impact non-heli-skiers as pointed out by Kling Mountain Guides in their comments, these concerns were ignored within the EA – even though this is an existing business operating in terrain that Silverton Guides is currently **not** permitted to operate within.

The GFO’s disinterest in tackling this issue seems to represent an attitude of selectively choosing issues to address in the NEPA process and represents a disenfranchisement of the citizen commenters who brought forth these issue during the scoping phase as well as in comments on the Preliminary EA. The BLM is required to engage within the NEPA process all substantive issues brought forth by agency staff, cooperating agencies and the public – clearly they failed in this requirement.

In addition, many commenters, including our organizations, requested that the BLM share any monitoring information related to past and ongoing Silverton Mountain Guides

permit activities and to incorporate this information into the analysis. As monitoring is part of the current permit requirement we assume that such information has been collected over the past several years. However, this information either does not exist or was not incorporated into the analysis. Assuming that the information exists, we do not understand why the BLM would not have used it to inform the decision to expand the SMG permit area. Several commenters, including retired BLM land managers familiar with the terrain and heli-ski permitting were amongst those who strongly suggested that the monitoring issue be examined thoroughly in this NEPA process, it was not.

- b) The GFO failed to accurately and professionally record and subsequently make available to the public comments submitted during both the scoping comment period and the comment period on the Preliminary EA as exemplified below.
- Scoping Phase SJCA submitted via email a five page scoping comment letter (see Appendix D) on the Silverton Guides NEPA process on August 14, 2016. The Silverton Scoping Comments Combined document released to the public truncated SJCA's letter to 3 pages. SJCA has no knowledge if the BLM received the entire letter and failed to scan it as part of their "Silverton Scoping Comments Combined" document or did not receive the entire letter. SJCA therefore has no knowledge as to whether the efforts to provide scoping comments were read, reviewed and compiled, or not. Because we don't have access to all of the comments submitted (or assumed by commenters to be have been received by the GFO) we don't know if the truncation of 40% of the SJCA comment letter was a random occurrence or a single act/error. However, this random finding of ours certainly does not bolster confidence in the professional handling of public correspondence and represents another example of a "shoddy" and unprofessional process that does not honor the contribution of the public to the NEPA process intended to guide management decisions on our publicly owned lands.
 - Preliminary EA Phase San Juan Citizens Alliance learned during a San Juan County Commissioners meeting (February 9, 2017) which included a briefing session by Gunnison Field Office leadership, that the GFO had decided not to post online the public comments submitted on the Preliminary EA. Subsequent to this meeting SJCA asked the GFO Field Manager formally in a February 14, 2017 letter (see Appendix E) for the comments to be released to the public directly. This request was denied by the GFO, and SJCA was informed that the comments would only be released through a Freedom of Information Act (FOIA) request (see Appendix F). SJCA filed a FOIA, received the public comments and then posted them on the SJCA website to make them available to the public – to date the BLM never has posted the public comments on their website. Subsequently to making the comments public, SJCA was contacted by several citizens who had submitted comments on the Preliminary EA via the SJCA website who informed the organization that their comments were not included in the

FOIA materials transferred to from the GFO via the Colorado BLM State Office and subsequently posted by SJCA.

SJCA's follow-up indicated that of the 161 comments submitted on the Preliminary EA through the SJCA website 25 comments had evidently not been received or otherwise accounted for as matched them with the received FOIA materials (documentation of this information can be made available). In SJCA's April 24, 2017 letter (see Appendix G) to the GFO, SJCA noted this discrepancy and asked for an explanation regarding the missing comments letters. SJCA also offered our assistance in providing names and other contact information to support this information inquiry.

In the GFO's reply letter of May 3, 2017 (see Appendix H) the GFO denied there were any missing comment letters and showed no interest in taking up SJCA's offer of supplying the names of the commenters whose correspondence was missing. SJCA has no further knowledge as to whether these 25 letters were received and reviewed, or not. We are deeply concerned that if 25 comment letters were missing in a sample of 161, then dozens of other comments letters could possibly also not be accounted for by the GFO – and therefore potentially not read and incorporated into the process. It is obvious from the GFO's response on May 3, 2017 that they have no interest in either pursuing these lost comments letters or in the professional accountability inherent in their responsibly as public servants to organize a thorough and legal NEPA process. Until we learn otherwise, we will assume that dozens of comments letters were lost or otherwise dismissed by the GFO – clearly an inexcusable approach to accountability from a Department of Interior agency.

The appellants have always been interested in complete public transparency as related to NEPA processes and therefore have pursued the generation, tracking and online posting of all public comments. We are dismayed the GFO apparently does not share this commitment.

- c) The GFO failed to accurately assess and recognize the legitimacy and quantity of public comments that recommended the GFO Field Manager choose either the No Action Alternative, the Proposed Action, or to significantly modify the Proposed Action.

Because, as noted above, the GFO refused to make the 370 comments (or perhaps more than 400 as comments are missing as noted above) on the Preliminary EA available to the public, a timely analysis of these comments was not possible. We were interested in not only reading the GFO-generated comment summary documents, but also reading the comments to gain a sense of what the overall public sentiment was regarding the Proposed Action – as well as making them available for anyone to read.

Because the GFO gave only a shill reason for not posting all of the comments on their website (“to protect the privacy of commenters”) it was not apparent why the GFO decided not to make the comments readily available. It is standard practice for public comments to be posted online. Indeed, when a member of the public submits comments to a federal agency they often see a disclaimer reminding them that their comments, and their identity, will become part of the public record. However, when we learned through our review of the comments that more than 85% of commenters wrote in opposition to the Proposed Action, it was certainly possible to surmise that the GFO did not want to be seen by the public as approving a proposal for a private business to operate on nearly 40 square miles of public lands also coveted for winter use activities by members of the general public when very significant public opposition exists. The GFO ignored the overall opinion of the public comments and then in an attempt to make them less accessible to public, refused to post the comments from a public that strongly indicated they desired a very different decision than the one made by the GFO Field Manager.

6. The GFO issued a Decision Notice that failed to address numerous significant issues generated during the scoping process and subsequently reiterated within public comments on the Preliminary EA and errantly issued a Finding of No Significant Impact.

At the end of the analysis process the GFO issued a Finding of No Significant Impact despite the significant number of detailed public comments outlining ways in which this project will indeed impact the human environment. Notable among these comments were several from professional members of the avalanche and guiding community who expressed concerns about permitting heli-skiing within terrain easily accessible on foot or snowmobile and dismissing the notion that the new terrain would somehow be safer than the existing permitted terrain. (see Appendix J – D. Hogan EA Comments) Additionally there were many comments from those who ski in the Silverton backcountry detailing ways in which the proposed action would increase user conflict. The GFO essentially ignored all of these concerns and one cannot read the Decision Notice without wondering whether the GFO even read many of the comments submitted at scoping or on the draft EA.

Due to the significant impact on the human environment posed by this project the GFO should move forward with an Environmental Impact Statement.

IV. Conclusion

As detailed above, the Gunnison Field Office failed their responsibility to the public within the statutes and standards of the National Environmental Policy Act (NEPA) to organize and complete a thorough and ethical environmental analysis regarding the proposal by Silverton Guides to expand the size of their Special Recreation Permit operational area. We recommend that the IBLA remand the Gunnison Field Office’s Decision Notice and Finding of No

Significant Impact and instruct them to commence and complete a new process in full accordance with NEPA including the utilization of an Environmental Impact Statement.

Thank you for your consideration of our concerns and addressing the public's interest in a corrected NEPA process.

Sincerely,



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ATTACHMENTS

Appendix A: WWA and CMC Scoping and EA comments

Appendix B: SJCA Initial Comment - Silverton Guides SRP Draft EA 11.28.16

Appendix C: Silverton Scoping Comments Combined

Appendix D: SJCA Scoping Comments Silverton Mtn Guides 8.2015

Appendix E: SJCA to GFO Waters 2.14.2017

Appendix F: Buickerood response (GFO FM Waters to SJCA's Buickerood)

Appendix G: Waters/GFO Missing SG SRP Comments Letter 4.24.2017

Appendix H: Buickerood response 3May17

Appendix I: SJCA Comments on Silverton Guides SRP Proposal (2nd comment letter) 12.12.16

Appendix J: D. Hogan EA Comments