





## May 30, 2010

## Addenda to Comments and Recommendations Gunnison Basin Federal Lands Travel Management FEIS COHVCO – TPA - RMEC

Gunnison Travel Management Planning Team GMUG National Forest 2250 Hwy 50 Delta, CO 81401

## Dear Planning Team:

We have reviewed our previous COHVCO/RMEC/TPA Comments and Recommendations to the Gunnison Basin Federal Lands Travel Management FEIS of May 20, 2010, and thought it necessary to add some additional comments and clarification.

We are still concerned with how the "Purpose of and Need for Action" statement in Chapter 1, pg. 15 sets up an expectation to: "determine the location and management of roads and trails needed for a transportation system that provides for resource protection, public safety, and recreation opportunities, meets access needs and is within the ability of the agencies to manage and maintain". This suggests an all modes of transportation assessment and disclosure of impacts including foot, livestock, and mountain bike uses within all parts of the planning area. We understand that the 2001 Travel Decision did not address desired or suitable modes of travel for open routes on a route by route basis for motorized uses and mountain bikes. However, by applying just the 2005 Road Rule process only (designation of motorized routes), it falls short of a full disclosure of all recreation user affects in Chapter 3. This is especially an issue in light of the continuing consideration for additional wilderness and roadless area designations or legislation in closely connected actions that affect the balance of transportation system opportunities.

We see no response to our concern for the need to portray, map, graph or chart recreation settings and opportunity classes by route and user type. This FEIS maintains a focus on a quantitative analysis that attempts to "balance" just <u>miles</u> of opportunity, and does not deal with the quality aspects and the social benefit needs for a sustainable, traditional set of recreation users and settings. Just putting a copy of the ROS "handbook" in as Appendix "I" is not a full response to a requirement for a social assessment.

The Purpose and Need for Action section states: "There is a need to reduce motorized route miles...in and effort to provide for a more sustainable transportation system". The Forest Service has apparently decided to apply the concepts of "sustainability" only to the budget, natural resources and economics of maintaining a system of miles of roads and trails. This is seen as a limited approach rather than an integrated, multiple-use approach that includes the sustainability of quality opportunities to meet the social needs of a mixed community of users.







There is a continued absence of any application of a required social assessment that would include a discussion about the sustainability of qualitative benefits to users and communities. There continues to be no references to any social analysis science in Appendix J., and Issue #7 deals only with noise, dust, speed and some basic economics.

We have also heard from several of our members that we did not provide adequate site-specific comments on some important routes that have long term historical use. As such, we offer the following:

- The South end of the Double Top trail system, 405, and it's connections to trail 409, as well as 959 and 418, creates a loop system. With the recommended use of trail 406 being downhill only, severely limits access from the South end of Cement Creek. Access to 959 needs to be reestablished. There is a short section of trail 787 from Spring Creek Pass at the very South end of the Gunnison NF that connects into the Rio Grande NF, and is marked for closure in the Preferred Alternative. This trail this trail connects the Ramboulett trail/4wd route from the west side of Spring Creek pass to the east side, connecting an entire loop from Lake City to Creede. Several motorcycle groups perform maintenance on this trail annually, as well as the local snowmobile clubs in the winter. This trail connects to the RGNF Snow Mesa to Miners Creek trail. This is a significant trail system, similar to the Crest trail, that needs to stay as multi use. The section in question is less than one mile long, so all user groups should be able to tolerate each other. There is no reason to make a change the current designation. This trail is motorized on the Rio Grande National Forest, but would be reduced to non-motorized in the Preferred Alternative. Because of the interaction of the Colorado Trail, and CDNST with historical motorized routes in this area, provisions need to be made to maintain the existing motorized access. It is an old road which the Snow Country Explorers groom for snowmobiling. This small closure basically ruins a 30 mile single track trail from Creede to Lake City. John Murphy should be in good position to reconsider this route, based on his RGNF experience. On the Preferred Alternative, there is a need for a very short connector between road 859 (near where it connects with trail 574) and road 858.1B. This section would only be a few hundred yards long, but allows the two segments of single track to be connected North to South. This route also provides a potential exit from the Beaver Creek/April Gulch trail system.
- Dispersed camping continues to be a hot issue for our members. One particular point that we've heard about is the route that goes just East of the Pothole Reservoir Number 2 in Taylor Park. This short spur takes campers to the edge of the forest, away from the noise, dust and activity on Taylor Park Road, creating a pleasant camping experience. We believe that this is a perfect example of a road that has received no maintenance from the USFS, is nearly flat with no route damage concerns, serves a purpose to the public, and is being closed without adequate understanding. This is but one of hundreds of spur routes that are being slated for closure, that deserve detailed investigation.
- Our friends at the Taylor Park Trading Post, the Cranor family, have been in Taylor Park since the dam construction in the mid 1930's. They have numerous inholdings in the







Park that they need access to. One in particular is Pass Creek, where they have a spring and ditch. The route is not only scheduled for closure, but appears to be scheduled for decommissioning. The ROD needs to either maintain routes that lead to inholdings, or it needs specific language granting all property owners access to their property. Failure to do so could result in an LEO issuing a ticket to the landowners for failing to abide by the MVUM, despite their legal rights to access.

We feel that these concerns need to be addressed and responded to in the Record of Decision, as they are basic to the life style issues that form the basis arguments by all users and communities in the Gunnison Basin. Your willingness to listen to, and respond to our input is appreciated.

Respectfully submitted by,

Jenms Carratt

Colorado Trails Preservation Alliance Don Riggle, President 725 Palomar Lane Colorado Springs, CO 80906-1086 (719) 633-8554 <u>info@coloradotpa.org</u>

Colorado Off –Highway Vehicle Coalition Glenn Graham, President and Chairman P.O. Box 62523 Littleton, CO 80125 (303) 249-9730 ggraham@cohvco.org

Rocky Mountain Enduro Circuit
Dennis Larratt, Treasurer
10990 N. Sunshine Dr.
Littleton, CO 80125-9432
(303) 470-5770 c (720) 530-9974 larratt@mho.com

on behalf of himself, Don Riggle and Glenn Graham