



April 16, 2012

South Platte Ranger District
Trail Creek Road and Trail Work
19316 Goddard Ranch Court
Morrison, CO 80465

RE: Trail Creek Watershed road and trail project

Dear Planning Staff;

Please accept this correspondence as the initial joint response to the above public notice of the open scoping period. This is a joint response from the Trails Preservation Alliance (TPA) and the Colorado off highway Vehicle Coalition (COHVCO). For purposes of these comments, COHVCO and TPA will be collectively referred to as "The Organizations". The Organizations represent the majority of the off road vehicle users in the state and have a long history of working with the USFS and BLM on off road recreation issues. The history and work of the TPA can be accessed at www.coloradotpa.org, COHVCO can be found at www.cohvco.org. Our remarks are consolidated to allow the USFS to understand the severity of our concerns about the above public notice.

OHV recreation is a growing sport in Colorado, and actions to reduce existing areas to OHV recreation, will only result in over use of the remaining areas. As a result, the Organizations believe it is critical that OHV resources in this area do not drop below levels provided prior to the Hayman Fire. The TPA and COHVCO are willing to work with the FS on all issues in the "717" area.

Length of initial comment/scoping period

The Organizations had initial concern regarding the exceptionally short notice 14 day period provided in the initial scoping notice published in The Gazette. While 14 days is theoretically enough time to comment, actual notice of the comment period was not brought to our attention until hours before the technical comment end. While the Gazette is read by our members, the review is often less than complete when notices are reviewed. Please don't interpret our members lack of interest in the notice as a lack of interest in the riding opportunities that were lost as a result of the fire.

Our concerns on this issue were mitigated by the fact that the District is willing to accept comments submitted after this comment period. Our concerns are further mitigated by our understanding that an additional 30 comment period is going to be provided for scoping in the near future. Our involvement in numerous Forest Service plans throughout the state, has highlighted one critical issue in the scoping process. If there is even the possibility that the public has not been aware of the project from the beginning, any closure, no matter how minimal will be viewed by certain groups as closing public lands to the public. This perception, no matter how incorrect it is or good the plan is overall, can be very hard to remove from any plan. Without true public comment and involvement in the planning process, a quality result simply cannot be developed.

Background

As noted above, knowledge of the scoping period was somewhat limited. The Organizations learned of the comment period when a member of our Organizations forwarded his proposed comments to us for reference. We totally support the attached letter from Mr. William Alspach, his engineering expertise and detailed knowledge of the "717" area are such that the USFS should take notice of his recommendations for both the technical engineering aspects of the FS plan, and also for his comments on the proposed OHV closures and re routes. Instead of rewording the detailed remarks of Mr. Alspach, our comments are going to cover the real world ramifications of the proposed FS plan. The entire "717" area is a prime OHV recreation area for all types of OHV's (ATV, MC, 4wd). It is heavily used by all, year round, and is a great positive economic factor to the local mountain communities.

The "717" was dealt a drastic destruction during the Hayman fire. (USFS personnel started). A significant portion of the area was destroyed and closed to OHV recreation. And the majority of it remains closed today. These closures only increased the recreation use on the remaining areas that were left open. Many meetings and discussions have taken place since the fire, about when will areas be re opened, trails rebuilt, etc. Most discussions on these topics ends up in a discussion about lack of resource of the FS to reopen to the original OHV recreation routes.

You combined this with the fact that the "717", is a primary beneficiary of significant State Parks OHV funding, for both the maintenance of the area and also for the inventory of the area. And now you are proposing major closures of areas that have benefited from the OHV funding. Please keep in mind that we are the only recreation group that pays for our form of recreation. The Organizations both request that the FS provide detailed explanations of why this work is needed. We also request that NEPA be conducted for all closures, decommissioning actions and any re routes. Your current plan and limited explanation of the proposed work is not acceptable.

Route specific concerns

The Organizations believe that most route specific concerns are addressed in Mr. Alspach's correspondence. The Organizations are vigorously opposed to the fact that under the current preferred alternative of the plan, FSR366 will simply dead end north of Trail 717, rather than connect to Route 3. Both FSR 725 and 366 are closed without exploration of possible reroutes in

the area to maintain this connectivity and loop opportunities. This is simply unacceptable and will create a trail that will be ripe for closure in future planning efforts since it is a dead end.

Conclusion/Recommendations

The Organizations look forward to partnering with the FS to maintain access to the recreational opportunities that were provided before the Hayman Fire. This access will be critical to quality recreational opportunities for all forest users. With this in mind, the Organizations propose the following:

1. No decommissioning, closures, reroutes in the "717" area be conducted until all original "717" OHV recreation routes destroyed by the Hayman fire are returned to a standard that will allow complete OHV recreation access;
2. For any closures or existing OHV reroutes, that a mile for mile exchange be made, you close one mile of OHV routes, then the FS open up an equivalent mile of OHV routes;
3. FSR 366 must not be decommissioned in such a manner as to leave a dead end trail;
4. The FS should hold public meetings on this issue, and form an ad hoc committee of local OHV recreation personnel (ATV, MC, 4wd) to work with the FS. This will allow public "buy in" and understanding of what issues the FS has and what actions can be taken other than closures of routes; and
5. Since State Park OHV funds have been spent in this area, no trails or roads that have benefited from these funds should be closed.
6. We request a complete listing of all "non system" routes that are going to be closed with this planned action, and that they remain open until the entire pre fire OHV routes are reestablished.

Please accept our comments. Any questions should be directed to the below, and will be disseminated as needed.

Thank you

Don Riggle



William Alspach

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16 April 2012

South Platte Ranger District
19316 Goddard Ranch Court
Morrison, CO 80465

Re: Trail Creek Road and Trail Work – Public Notice: 933829.

Dear Forest Service Staff and Personnel:

The purpose of this letter is to submit supplemental and reiterate select comments to my letter originally dated 3 April 2012, regarding the South Platte and Pikes Peak Ranger Districts, Pike National Forest Notice for Road and Trail Work within the Trail Creek Watershed, Public Notice: 933829.

1. Reference is made to the Trail Creek Watershed Assessment & Conceptual Restoration Plan (The WARSSS Results of the Hayman Fire), February 18, 2011 and The Trail Creek Watershed Master Plan for Stream Restoration & Sediment Reduction, April, 22, 2011. *In both of these reports, road 366 is only identified for relocation, not decommissioning.* Approximately 1500 ft of road 366 is identified for relocation, not the almost 1.75 miles that is being proposed for closure or decommissioning. Similarly for trail 725, only relocation is recommended by Mr. Rosgen's analysis and reports, not decommissioning. I am very familiar with Mr. Rosgen's work and expertise in the fields of Hydrology and Fluvial Geomorphology. As a Certified Professional in Erosion and Sediment Control (CPESC) and a Professional Water Resources Engineer, I have studied his work and am well acquainted with his reputation. However, it should be noted that his methods are not without controversy nor are they universally accepted by all professionals.
2. Comparing the two referenced reports, there are inconsistencies in the estimates of sediment contributions to Trail Creek by OHV Roads and Trails. Appendix E of the Trail Creek Watershed Assessment & Conceptual Restoration Plan states that the "relocation" of select roads and trails might reduce sediment delivery by 100 tons/yr. On the other hand, The Trail Creek Watershed Master Plan for Stream Restoration & Sediment Reduction, using the same analysis, conclusions, similar figures and maps states that the reduction in sediment might be 200 tons/yr. Why are the estimates so vastly different? One might construe that the estimates are being arbitrarily altered/inflated without explanation between the two reports. It certainly calls into question the validity of the estimates derived from the same analysis.
3. The Trail Creek Watershed Assessment & Conceptual Restoration Plan cites on page 6 the use of studies by Colorado State University and others for the generation and delivery of sediment to stream channel networks from roads and trails. Extrapolation of this data to other watershed can only be generic at best. These studies may certainly provide estimates on the magnitude of the potential for sediment delivery; however, these studies did not consider the individual characteristics of the slope steepness, slope lengths, soil erodibility, vegetation types and conditions, and other factors unique to the Trail Creek Watershed. As presented in the Plan, the "estimated"

sediment contribution from all of the trails and roads network for the entire watershed is only 4% of the total! With the majority of the watershed being severely burned over by the Hayman Fire (88% of the watershed area), 96% of the sediment contribution originates from the exposed stream banks and surface erosion. The predominate sediment problem is certainly not from OHV use or the associated roads and trails, but from other sources within the watershed. To cite erosion and sediment contribution to the creek as reasons to close or decommission public access routes is simply unfounded and not based on facts. These reports themselves recommend "improved drainage, site specific road relocation, routing the channel away from road fills, stabilizing tributaries and other Best Management Practices" to mitigate sediment delivery from roads and trails, NOT closures or decommissioning!

4. Woodland Park, the community in which I live and work, sits and the portal to the North Divide/717 (including the Trail Creek Watershed area) and South Rampart trail networks. Both of these trail networks provide highly demanded recreational opportunities along the southern Front Range and help meet the ever increasing need for outdoor recreational opportunities on Public Lands. A substantial portion of Woodland Park's economic livelihood is supported by the users of these Public Lands, especially OHV users. During the peak seasons, OHV users have been observed passing through Woodland Park at rate of one per minute on their way to recreational opportunities surrounding the Woodland Park area. Reducing or eliminating OHV opportunities will undoubtedly have an adverse and direct economic impact to our City, one that depends on tourism and recreation on Public Lands for our prosperity.
5. Just as our regional population continues to grow, so does the number of citizens seeking opportunities to enjoy our Public Lands. This is especially apparent in the increasing number and types of OHV's and users coming to the North Divide/717 and South Rampart trail networks. The proposed actions to close and reduce the number and diversity of trails and road opportunities in the North Divide/717 (Trail Creek area) does not make sense when the demand for these types of recreational opportunities only continues to grow. Moving forward with the proposed closures and decommissionings will only force more and more users onto to a reduced inventory of trails and roads, concentrating users into an ever smaller area. Not only is this a dis-service to the citizens and users that choose to recreate on these Public Lands, it shows poor stewardship of the forest resource by failing to disperse activities and an insensitivity to meeting the ever increasing public demand for recreational opportunities.
6. Closure (i.e. Decommissioning) of road 366 and trail 725 eliminates a popular, useful and sole northerly connection to the Trail Creek area and the surrounding network of roads and trails. These two routes provide the only access to this network on the northern end of Trail Creek Road/CR3 and serves as a primary connection to the network for West Creek area residents. Closure of these routes will force all users to connect via 717 which is more than a mile further to the west and 717 is not open for vehicles over 50" wide. Forcing OHV users to a sole access at 717 is just not a sustainable alternative given its westerly location and current conditions. There are no parking or any other trailhead facilities at the 717/CR 3 intersection.
7. Road 366 provides a primary and sole loop opportunity between the 364/Manchester Creek area, the Trail Creek area and the 364/362 route. Loop opportunities are already in short supply and especially limited for the full spectrum of trail users. Any further reduction of this or any other loop opportunities should be very closely examined and closed only when an equivalent alternative is provided and open.

8. No mention is made in either of the Public Notices regarding your intent to close "non-system" roads and trails. If changes to or closures are proposed for any "non-system" routes, none of these routes, roads or trails, should be closed or decommissioned until a thorough Travel Plan has been developed, publicly vetted, approved and implemented. Are there "non-system" roads and trails designated for decommissioning as part of this action?
9. Recently Colorado State Parks OHV Grant monies were awarded and provided to the USFS specifically for the purpose of inventorying and cataloging all existing trails and roads (both "system" and "non-system") in this area, including the Trail Creek Watershed. These funds were provided solely by motorized OHV users and were spent in good faith to support the development of the area's Travel Plan that has yet to be done. Closure of any existing routes, using information gained through the OHV Grant funded inventory process, is disingenuous to the OHV users that funded the work, and only serves to confirm any suspicions that the inventory was not to the benefit of the users that funded the inventory work, but is being used to close routes without a thorough public review process.

Sincerely,



William A. Alspach, PE, CPESC
Professional Engineer,
Certified Professional in Erosion and Sediment Control

cc:

Jeri Marr, Forest Supervisor
Daniel Jiron, Regional Forester
Honorable Doug Lamborn, Congressman
David J. Turley, Mayor Woodland Park
Jim Ignatius, Teller County Commissioner
Tom Metsa, State OHV Program Manager, Colorado Parks & Wildlife
Don Riggle, Trails Preservation Alliance
John Bongiovanni, Colorado Off-Highway Vehicle Coalition