



September 7, 2016

Attn: Erin Connelly, Forest Supervisor  
The Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands  
2840 Kachina Drive  
Pueblo, CO 81008

**SUBJECT: Pike & San Isabel National Forest, Travel Management EIS**

Dear Supervisor Connelly:

Attached with this packet are the collective comments relevant to the Pike & San Isabel National Forest Travel Management EIS Project submitted on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO").

We have assembled our comments in a convenient format including an Executive Summary followed by our specific observations, remarks and comments regarding each of the six different Ranger Districts.

The TPA and COHVCO both firmly believe that multi-use access and motorized recreation within the Pike & San Isabel National Forest is, and will continue to be, vitally important to the economic vitality of Southern Colorado and an expected component of the recreational experiences provided by our public lands. We stand behind a sustainable and robust network of multi-use/motorized routes and trails that sufficiently serve the needs and demands of all forest visitors.

Together the TPA and COHVCO are pleased to offer our collective assistance and expertise to this extremely important project. We thank you for reviewing and considering our comments and suggestions. Our point of contact for this project will be William Alspach, PE at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259.

Sincerely,

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Attn: Erin Connelly, Forest Supervisor  
The Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands  
284 Kachina Drive  
Pueblo, CO 81008

**Pike & San Isabel National Forest, Travel Management EIS  
Initial Comments - EXECUTIVE SUMMARY**

Dear Supervisor Connelly:

Please accept these comments on the Pike & San Isabel National Forest Travel Management EIS Project on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). The TPA is a volunteer organization created to be a viable partner assisting public lands managers, 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 for the sport and works to help ensure that the USFS allocates a fair and equitable percentage of public lands access to diverse trail riding opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users and is a member supported 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. TPA and COHVCO are referred to collectively in this correspondence as "The Organizations."

As stated in Notice of Intent (NOI) for this project, the Purpose and Need for this Action is ***"...to improve management of motor vehicle use..."*** the Organizations contend that in order to "improve" the management of motor vehicle and OHV use, an adequate and varied inventory of routes (i.e., roads and trails) that fulfills the user's spectrum of needs (today and into the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance. Closure and a reduction of recreational opportunities and the resulting concentration of the ever increasing number of users does not provide a balanced solution to meeting the needs of the recreationalists and other legitimate forest users. This stated Purpose and Need (as published in the NOI) needs to "guide" the process throughout the duration of this action and be utilized to impartially evaluate each alternative.

At this time, The Organizations generally support the proposed **Alternative D with modifications**. Fundamentally we support Alternative D with immediate implementation of the South Rampart Travel Management Plan (SRTMP) (specifically SRTMP Alternative – The Preferred Alternative) and consideration of our comments and modifications for specific roads and trails that we have provided for each individual Ranger District.

The economic impacts of multi-use and motorized recreation within the counties and communities encompassed by or adjacent to the Pike & San Isabel National Forest cannot be overlooked. Many of the visitors that choose to visit the Forest combine their recreational activities and often include using forest routes to access camping sites, setting up a camp and then employing motorized means to travel and explore the surrounding environment. Significant economic benefits are realized by all of Southern Colorado as the public travels to and from their valued destinations within the Pike & San Isabel National Forest. As an example, motorized recreational enthusiasts were responsible for approximately \$1.6 billion in direct expenditures relating to motorized recreation in Colorado during the 2014-2015 season<sup>1</sup> As popular as motorized recreation is within the Pike & San Isabel National Forest, the economic benefits to local economies and nearby communities must not be undervalued.

The organizations feel that this project must work diligently to ensure that a balanced continuum of opportunities are provided in the Pike and San Isabel National Forest to properly serve the diverse cross section of our population and meet their recreational needs. We reasonably expect that this project will fairly and adequately provide an Environmentally, Economically and Socially sustainable end state that supports multi-use recreation.

Our two organizations have solicited input, comments and suggestion from our members, supporters and a diverse collection of motorized recreation enthusiasts and have developed our consolidated comments based upon that input. The following statements summarize our comments:

- With few exceptions, the roads and trails throughout all six Ranger Districts (including the routes listed in Exhibit A of the Settlement Agreement) have been in existence and providing public benefits for decades. History has shown that each of these routes provides a level of tangible recreational, economic and/or forest access value.
- The Hayman Fire (and Waldo Canyon Fire) demonstrated firsthand the advantages of having a robust and interconnected network of routes. Continuing to have an adequate network of forest roads and trails will be truly beneficial and necessary in providing sufficient access for future timber management, continuing forest visits and recreation, emergency egress and wildland firefighting efforts.

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<sup>1</sup> DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

- In general we encourage and support the decisions to convert most any existing National Forest Service Road (NFSR) to Full Size Trail or another trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC), (2015) Great Trails: Providing Quality OHV Trails and Experiences. Conversion of roads to "multi-use trails" will also make those routes eligible for Colorado Parks and Wildlife OHV grant funds.
- We encourage this project to consider the inclusion and adoption of more "non-system" roads and trails to help meet the Forest's ever increasing demands and needs such as timber and fuels management, fire mitigation work, fishing, driving for pleasure (including OHV's), viewing scenery and wildlife, utilizing developed and dispersed camping sites and picnicking. *(This adoption of previous non-system trails would not be unprecedented as demonstrated by the recent action by the Pikes Peak Ranger District to adopt the Buckhorn Trail in the Bear Creek Watershed area from a "user created" trail to "system" trail).*
- In general the Organizations do not support the conversion of routes to "Administrative Use Only".
- Properly constructed roads and trails within the forest coupled with sensible timber management will all help to mitigate any effects of climate change both today and into the future. Minor adjustments to USFS design criteria can also be used to mitigate more extreme weather events and any increased runoff that might be attributed to climate change.
- By providing an adequate and varied inventory of routes and trails that fulfills the multi-use and motorized user's spectrum of needs (today and the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance requiring less expenditures on maintenance, signage, enforcement, etc.
- The roads and trails in Hackett, Longwater and Metberry Gulches along with Coral Creek (AKA The Wildcat Canyon Area) have long been enjoyed by enthusiasts and recreationists and were a longtime favorite for access to and across the South Platte River. Rather than allowing the Hayman Fire to permanently take away a treasured resource from public use, the Organizations strongly support the reopening of these routes (e.g. as Full Size Trails) between all of the adjacent Ranger Districts and Counties. Deliberate efforts need to be made to provide environmentally friendly and sustainable crossings across the South Platte River. Technical, engineered solutions to cross the river are indeed possible and must be explored, planned, designed and implemented.
- The public will be solely dependent upon the Pike & San Isabel National Forest Staff to ensure that any and all requirements and recommendations for seasonal closures are fair, reasonable, rational, unbiased and in the very best interest of the spectrum of users. Natural route closure generally occurs during the winter season due to snow. Wherever possible, if the seasonal conditions on the ground are likely to represent an effective barrier to travel, the Forest should avoid implementing seasonal closures that create confusion and create an unnecessary

enforcement and financial burden. Seasonal closures that affect only motorized users, are inconsistent with the best available science for protecting habitat and seasonal closures should be made universal to all users.

- Closing routes to OHV use does not eliminate the need for maintenance, but makes those routes ineligible for Colorado Parks and Wildlife OHV grant funds, one of the available funding sources and tools that can be used to provide needed operations and maintenance resources. The lack of fiscal capacity by the USFS should not be criteria for, or lead to closures and reductions in public recreational opportunities, closure of routes or elimination of public access to the National Forest.

In conclusion, the Organizations are pleased to offer our collective assistance and expertise to this extremely important project. We firmly believe that multi-use access and motorized recreation within the Pike & San Isabel National Forest is, and will continue to be, vitally important to the economic vitality of Southern Colorado and an expected component of the recreational experiences provided by our public lands. We stand behind a sustainable and robust network of multi-use/motorized routes and trails that sufficiently serve the needs and demands of all forest visitors. Finally, we feel it is obvious but important to acknowledge that as the population along the Colorado Front Range continues to grow, the needs and demands for multi-use and motorized recreation will only escalate and that it will be imperative that the Pike & San Isabel National Forest works diligently to serve the public by professionally managing and providing the necessary recreational opportunities that support multi-use and motorized recreation.

We thank you for reviewing and considering these comments and suggestions. The Organizations would welcome a discussion of these opportunities at your convenience. Our point of contact for this project will be William Alspach, PE at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259.

Sincerely,



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September 7, 2016

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**Pike & San Isabel National Forest, Travel Management EIS  
Initial Comments**

Dear Supervisor Connelly:

Please accept these comments on the Pike & San Isabel National Forest Travel Management EIS Project on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding and multi-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to insure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail multi-use recreational opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users in Colorado seeking to represent, assist, educate, and empower all motorized recreationists in the protection and promotion of multi-use and 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. TPA and COHVCO are referred to collectively in this correspondence as "The Organizations." The Organizations offer the following comments and concerns regarding this project.

1. At this time, The Organizations generally support the proposed **Alternative D with modifications**. Fundamentally we support Alternative D with immediate implementation of the South Rampart Travel Management Plan (SRTMP) (specifically SRTMP Alternative B – The Preferred Alternative) and consideration of our comments and modifications for specific roads and trails that we have provided for each individual Ranger District.

2. The Organizations do not support the proposed Alternative B as it eliminates an excessive number of viable routes (approximately 700 mi) and will not meet the needs of the public. Elimination of routes at this magnitude will not protect the environment, will not protect natural or cultural resources, and does not fulfill the Purpose and Need of this project to improve the management of motor vehicle use on the Pike & San Isabel National Forest. Alternative C does not achieve an improvement in management, does not go far enough and again does not fulfill the Purpose and Need of this project. Alternative A relies upon old, out dated information, does adequately reflect current conditions and lacks planning for future uses.
3. We acknowledge that the Pike & San Isabel National Forest has struggled with the proliferation of non-system trails in the Forest. However, we feel much of this stems from an increasing need and demand for multi-use recreational opportunities on public lands in general and especially near urbanized areas along the Front Range of Colorado. Several of the Districts are unique in that they are within close proximity of Colorado Springs, the second largest city in Colorado with a population well over 400,000. As the State of Colorado's population has grown, so have the sales of Off Highway Vehicles (OHV's), bicycles, hiking equipment, camping units and other forms of outdoor recreation increasing the demand for recreation sites within the Pike & San Isabel National Forest. It is estimated that approximately 8.5% of the households in Colorado participate in OHV recreation and that between 2000 and 2014, resident OHV registrations have increased by 119% with Non-resident permits increasing by over 1,607%!<sup>1</sup> The need and demand for OHV recreational opportunities are growing and will continue to grow, please consider roads and trails as critical infrastructure for recreation.
4. As stated in Notice of Intent (NOI) for this project, the Purpose and Need for this Action is ***"...to improve management of motor vehicle use..."***, the Organizations contend that in order to "improve" the management of motor vehicle and OHV use, an adequate and varied inventory of routes (i.e., roads and trails) that fulfills the user's spectrum of needs (today and into the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance. Closure and a reduction of recreational opportunities and the resulting concentration of the ever increasing number of users, has shown again and again that the desired results are not obtained and does not provide a balanced solution to meeting the needs of the recreationalists and other legitimate forest users. This stated Purpose and Need (as published in the NOI) needs to "guide" the process throughout the duration of this action and be utilized to impartially evaluate each alternative.
5. The economic impacts of multi-use and motorized recreation within the counties and communities encompassed by or adjacent to the Pike & San Isabel National Forest cannot be overlooked. Many of the visitors that choose to visit the Forest combine their recreational

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<sup>1</sup> DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

activities and often include using forest routes to access camping sites, setting up a camp and then employing motorized means to travel and explore the surrounding environment.

Significant economic benefits are realized by all of Southern Colorado as the public travels to and from their valued destinations within the Pike & San Isabel National Forest. As an example, motorized recreational enthusiasts were responsible for approximately \$1.6 billion in direct expenditures relating to motorized recreation in Colorado during the 2014-2015 season<sup>2</sup>. As popular as motorized recreation is within the Pike & San Isabel National Forest, the economic benefits to local economies and nearby communities must not be undervalued.

6. The Organizations believe that continued multi-use access and motorized recreation within the National Forest is vitally important to the preservation and conservation of our public lands and the well being of our citizens. The Organizations acknowledge that as America becomes more urbanized and populations rise, our younger citizens are becoming less connected to and are less likely to identify with the outdoors in their daily lives. Our organizations have worked diligently and continuously to help Coloradans and visitors to our State to be able to access and enjoy our public lands in a safe and responsible manner. We recognize that there is a bona fide correlation between an individual's personal health and their participation in outdoor activities. We continually strive to get youth and families excited about visiting, seeing and experiencing all that our public lands have to offer. We have a history of partnering with the USFS to protect our forest resources while reducing and eliminating barriers that are continuing to make it difficult for Americans to get outside and travel on a multi-use trail or share a road as part of their outdoor recreational experience. The organizations feel that this project must work diligently to ensure that a balanced spectrum of opportunities are provided in the Pike and San Isabel National Forest to properly serve the diverse cross section of our population and meet their recreational needs. This Travel Management Plan/Environmental Impact Statement must fairly and adequately improve the management of motor vehicle use while providing an Environmentally, Economically and Socially sustainable end state.
7. It is well recognized that the average age of our country's population is increasing and the number of persons aged 50 and older is steadily increasing. As the average age grows, so is the number of people still choosing to recreate outdoors but more and more will be less able to use non-motorized methods of travel or participate in high-energy, high-skill sports. As this demographic group grows, so will their needs for access to the Forest by motorized or other assisted methods. If we collectively fail to recognize and plan for this changing demographic, we will be deliberately excluding a significant and growing segment of the population from the opportunities to experience and enjoy the Pike & San Isabel National Forest. Many of us hope to retain our individual mobility into the "Golden Years", but many will not, and they will need to rely upon some sort of motorized assistance to access the places we all enjoy and cherish.

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<sup>2</sup> DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016



8. With few exceptions, the roads and trails within the Pike & San Isabel National Forest (including the routes listed in Exhibit A of the Settlement Agreement) have been in existence and providing public benefits for decades. History has shown that each of these routes provides a level of tangible recreational, economic and/or forest access value. The Hayman Fire demonstrated firsthand the advantages of having a robust and interconnected network of routes. Continuing to have an adequate network of forest roads and trails will be truly beneficial and necessary in providing sufficient access for future timber management, continuing forest visits and recreation, emergency egress and wildland firefighting efforts.
9. We would encourage the Pike & San Isabel National Forest to consider inclusion and adoption of quality “non-system” routes to help meet the Forest’s transportation and recreational needs and demands. This adoption of non-system routes would not be unprecedented as demonstrated by the recent action by the Pikes Peak Ranger District to adopt the Buckhorn Trail in the Bear Creek Watershed area from a “user created” trail to a “system” trail. We would also question if any of the “non-system” routes designated to be closed or decommissioned were indeed historic routes that existed prior to 1984, and may have been omitted from the Motorized Vehicle Use Map (MVUM) development process.
10. The Organizations would encourage and support the Forest’s decision to convert most any existing National Forest Service Road (NFSR) to a Full Size Trail or another trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50” or less in width). We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council’s (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.
11. The Organizations feel the following general comments are important and relevant in meeting the Purpose and Need of this project along with the project goals of improving the management of motorized recreation, protecting the environment and minimizing impacts:
  - a. We feel it is important to spotlight the following principles regarding multi-use recreation and are important considerations when evaluating any modifications to the existing routes and networks<sup>3</sup>:
    - i. Generally forest visitors participating in multi-use activities will use routes that exist and adequately satisfy their needs and desires.
    - ii. Non-system routes should be reviewed during this review process on a case-by-case basis to determine if any non-system routes will fulfill a valid motorized need and can be altered to meet recreation and resource considerations.

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<sup>3</sup> Management Guidelines for OHV Recreation, National Off-Highway Vehicle Conservation Council, 2006

- iii. Route networks and multi-use trail systems should meet local needs, provide the desired recreational opportunities and offer a variety of quality experiences. We are not asking that this be done at the expense of other important concerns, but a system of routes that does not meet user needs will not be used properly and will not be supported by the users. Occurrences of off-route use, other management issues and enforcement problems will likely increase if the system routes do not provide an appropriate and enjoyable opportunity.
  - iv. Recreational enthusiasts look for variety in their various pursuits. For multi-use to include motorized/OHV users, this means looped routes are a priority. An in-and-out route may be satisfactory if the destination is so desirable that it overshadows the fact that forest visitors must use the same route in both directions (e.g., access to dispersed camping sites, overlooks, historic sites, etc.). However, even in these cases, loop systems will always provide better experiences.
  - v. Adequate legal parking and dispersed camping areas are necessary to fulfill the needs and desires of the motorized recreation community
- b. Not all dead end roads are necessarily of low value and in need of closure. Many dead end spurs and “low value” routes provide access to picnic areas, dispersed camping sites, overlooks, etc. Although the values of these roads is less than that of main roads, connectors and loops, (i.e., “higher value” routes) their individual, overall benefit and value must be individually considered. We acknowledge that these roads will likely not generate much positive public interest and comment, however these routes can still have substantial importance to the public. We would encourage the District to listen to your own recreational and field staff when assessing any low value or dead end spur roads.
- c. Duplicative roads and trails may on the surface appear redundant and not needed. This is often the cry from those unfamiliar with multi-use and motorized recreation (an activity some of those individuals choose not to participate in) or simply seeking to eliminate or reduce public use of these routes. However, we would challenge that some duplicative routes may in fact offer unique benefits for distributing the use rather than concentrating use to a single route or may offer looping and other recreational opportunities. Therefore, proposed route closures need to be evaluated not only at the level of the individual route or habitat, but also at a broader level of evaluating where a potential closure would displace affected users to and the resultant impact to both areas.

- d. "Desired Recreational Experiences" is subjective and will vary from individual to individual. A call to decommission roads to return areas into more natural states and enhance recreational experiences is mostly subjective. Very few will be able to enjoy the forest and all of the resources the forest has to offer if adequate motorized access is not provided. Multi-use and motorized recreation is indeed a bona fide form of recreation and not one to be minimized or eliminated on public lands. Just as it is important to maintain the quality of visitor experiences for non-motorized use, it is equally important to maintain the quality of visitor experiences for motorized use.
- e. An adequate network of forest roads and trails is necessary to provide access in times of emergency. The USFS is a world renowned expert on wildland firefighting and knows firsthand the importance of good access, redundant routes and routes in key places and the impact of those routes on the safety of the firefighters, the public and successful wildland firefighting. The demands for reduced road inventory, for reduced route density and increased decommissioning of roads is not collectively and universally in the best interest of the forest nor the public. The demand for more and more closures of multi-use and motorized access is often based upon self-serving desires and an unwillingness to share our natural resources with others, intolerance of mixed forest uses and an unwillingness to coexist in our individual pursuits of recreation. Likewise the premise that decommissioning roads will reduce human caused fires is absolutely unfounded and unsubstantiated and should not be utilized as a criteria for any decisions regarding the elimination or closure of any multi-use or motorized route.
- f. In the past there have been unfounded concerns for American elk and mule deer as a reason to close and limit multi-use and motorized recreation on public lands. The premise that "large animals, especially deer and elk, are sensitive to traffic and activity along roads" is not supported by published scientific research. Extensive studies completed as recently as 2005 by the National Park Service (NPS) in Yellowstone Park stated that "Effects of winter disturbances on ungulates from motorized and non-motorized uses more likely accrue at the individual animal level than at the population scale". Even the biologist performing the research stated that the debate regarding effects on human recreation on wildlife is largely a "social issue" as opposed to a wildlife management issue. This NPS research would certainly seem relevant to wildlife in the Pike & San Isabel National Forest and does not support a premise for closures and reductions in multi-use recreational opportunities.<sup>4</sup> Additional research published by Mark Rumble, Lahkdar Benkobi and Scott Gamo in 2005 has also found that hunting invokes a more significant response in elk than other factors in the same habitat area

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<sup>4</sup> Wildlife Response to Motorized Winter Recreation in Yellowstone, 2005 Annual Report, White, Davis & Borkowski

(e.g. roads or trails).<sup>5</sup> Likewise research by Connor, White and Freddy in 2001 has even demonstrated that elk population increases on private land in response to hunting activities.<sup>6</sup> This research again brings into question why multi-use trail recreation (specifically motorized recreation) might be cited and used as the justification for any closures or modification to public access.

- g. The Organizations in general disagree with the conversion of routes to “Administrative Use Only”. We recognize the primary need for this designation is for fire access. However, if a route is important for USFS and agency staff to access a location, it is very probable that that same route is equally important or desirable for the public to access the same or similar location.
- h. The Organizations are aware of demands regarding a perceived inadequacy of the USFS to provide enforcement of regulations pertaining to multi-use and motorized recreation in particular. We would challenge that based upon several studies, pilot projects, etc. by the Colorado Parks and Wildlife Division, the USFS and the BLM to analyze if indeed an enforcement issue exists, and without exception those projects have shown there are minimal problems due to a lack of enforcement. Unauthorized off-route travel can be an issue for law enforcement, but the answer for this comes by providing an adequate system of routes that meets the needs of the motorized recreation community. The State of Colorado’s OHV funds have been used to subsidize law enforcement programs and the detailing of law enforcement officers to OHV areas only to come back with consistent results that this cry for the need for enforcement is unfounded, unsubstantiated and just plain inaccurate. In 2011 the Colorado Parks and Wildlife Division initiated an OHV Law Enforcement Pilot program to address the accusations, questions and concerns raised by critics of OHV recreation on public lands in Colorado. The data and observations gathered from this Pilot program in 2011, 2012, and 2013 repeatedly demonstrated excellent compliance with OHV rules and regulations throughout Colorado by OHV users. It was estimated that over 10,000 individual OHV users were stopped and inspected during the Pilot Program and 94% of those users were found to be fully compliant with Colorado OHV laws and regulations.<sup>7</sup>

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<sup>5</sup> Rumble, Mark A; Benkobi, Lahkdar; Gamo, Scott R; 2005. Elk Responses to Humans in a Densely Roaded Area; Intermountain Journal of Sciences

<sup>6</sup> Connor, White & Freddy; Elk Movement in response to early-season hunting in Northwest Colorado; The Journal of Wildlife Management; Volume 65, Number 4; October 2001

<sup>7</sup>The 2014 Off-Highway Vehicle Law Enforcement & Field Presence Program, Colorado Parks and Wildlife Division, March 2014

- i. Sound. Motorized and non-motorized uses are equally legitimate uses of public lands and especially on USFS roads and multi-use/motorized trails. Sound from motorized use is to be expected in areas open to motorized use. The Organizations would offer that the State of Colorado already has strict standards for any and all sound emanating from OHV's. This very detailed standard has proven to be effective since 2006 and governs vehicles produced as far back as 1971. OHV users themselves have funded efforts to educate, test and "police" themselves for sound level compliance. We feel that complaints of noise and demands for sound reduction are once again unfounded and will often be used as a selfish excuse to try and reduce or eliminate motorized access and use of public lands.
- j. Climate Change. There has been little actual research quantifying how outdoor, forest based recreation will be affected by climate change and how to mitigate for climate alterations in a meaningful and productive manner. There is little scientific research, and far more opinion, on how climate change should be regarded, planned for and implemented. Some benefits may actually be realized through climate change such as an increased number of recreation days per year, longer growing seasons, etc. The analysis of the effects of climate change, specifically upon forest recreation, and how to properly address effects (if indeed there are any) remains a fledgling science at best, and subject to individual opinions. As a change in climate occurs (as it has in the past) there is no doubt that the forest ecosystems will adapt and our socioeconomic habits and factors will also change and adapt. To restrict or limit accessibility and the recreational use of the Pike and San Isabel Forests would be impulsive, unjustified, reckless and impossible to enforce. The shear growth of our population, uncertainty about incomes and spending, changes in future building materials, and the demand for forest products (domestic and imported) just to name a few will likely have far more impacts on the forest compared to the effects of climate change. Properly constructed roads and trails within the forest coupled with sensible timber management will all help to mitigate any effects of climate change both on the existing and future road and trail infrastructure. Minor adjustments to USFS design criteria to include values such as Design Storm Frequency, Rainfall Intensity, Runoff Coefficients coupled with appropriate sizing of the supporting drainage infrastructure (e.g. ditch sizing, culvert sizing, rip rap sizing, re-vegetation practices, trail/road alignment, etc.) can all be used to mitigate more extreme weather events and any increased flows that might be attributed to climate change. We feel it is interesting to note that one of the cited effects of climate change is an increase in wildfires; this concern would seem to actually support an argument for an even more extensive and robust transportation network to facilitate emergency response to wildfire. We also feel it is important to point out that trends have already begun to replace internal combustion engines with electric motors in

OHV's, a trend we expect to continue and increase and thereby reduce OHV's collective carbon footprint.

- k. Financial Sustainability. As stated previously, the Organizations would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to a Full Size Trail or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width). Conversion of roads to multi-use, motorized trails will make those routes eligible for Colorado Parks and Wildlife OHV grant funds (*which can specifically be used for the construction, reconstruction or maintenance of OHV routes or multi-use trails that allow for motorized use and other activities*). These conversions will thereby help reduce the direct financial burden and back log to the USFS and can supplement agency funding with user provided funds that were previously unavailable for these routes. Conversion from roads to trails will also reduce the required maintenance level and reduce the necessary amount and back log of funding. Likewise by providing an adequate and varied inventory of routes and trails that fulfills the user's spectrum of needs (today and the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance requiring less expenditures on maintenance, signage, enforcement, etc. Existing routes require maintenance; OHV funds have been and will continue to play an important role in meeting USFS operations and maintenance (O&M) costs. Closing routes to OHV use does not eliminate the need for maintenance, but takes away one of the available funding sources and tools that can be used to provide O&M resources. Finally, the lack of fiscal capacity by the USFS should not be criteria for, or lead to closures and reductions in public recreational opportunities, closure of routes or elimination of public access to the National Forest.
12. Regarding the stipulations for the consideration of Seasonal Closures pursuant to Paragraph 4 of Exhibit B, for areas designated under the Forest Plan as 5B Big Game Winter Range Areas, we offer the following comments:
- a. Recommend that the selection of a specific date(s) to implement any required closure period consider the following criteria:
    - i. Minimization of the closure period to maximize availability of the routes and areas for recreational uses.
    - ii. Consistent and uniform closure dates to minimize confusion within the individual Ranger Districts and throughout the Forest. Multiple dates will likely be more difficult to communicate to Forest visitors and more challenging to enforce.

- iii. Natural route closure generally occurs during the winter season due to snow. Coincidence of the required closure periods with the winter season will help minimize impacts to multiple-use of the specified routes. Wherever possible, if the seasonal conditions on the ground are likely to represent an effective barrier to travel, the Forest should avoid implementing seasonal closures that create confusion and create an unnecessary enforcement and financial burden.
- iv. Seasonal closures that affect only motorized users, are inconsistent with the best available science for protecting habitat<sup>8</sup> and seasonal closures should be made universal to all users.

**b. The public will be solely dependent upon the Pike & San Isabel National Forest Staff to ensure that any and all requirements and recommendations that result from the consultations with Colorado Parks and Wildlife are fair, reasonable, rational, unbiased and in the very best interest of the spectrum of users.**

### Below are specific comments relating to the routes within the Leadville Ranger District:

1. We would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width) whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.
2. NFSR 105 – this route provides the only eastern access to the Hagerman Pass area and the destinations westward such as Ivanhoe Lake, the Frying Pan River, Ruedi Reservoir, etc. Hagerman Pass provides a unique opportunity to retrace the history of the Colorado Midland Railroad at its crossing of the Continental Divide and a glimpse into the past of such engineering marvels as the Hagerman and the Busk-Ivanhoe Tunnels. The Midland's route from Leadville to Hagerman Pass and the 4% grades witnessed some the most spectacular and finest Colorado railroad photography ever taken. This popular route has long been a favorite of multiple user groups and continued access will be essential to allowing the public to continue to explore and experience the rich history and natural beauty of the area.

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<sup>8</sup> Sime, Carolyn A; 1999. Domestic Dogs in Wildlife Habitats, Effects of Recreation on Rocky Mountain Wildlife,

3. NFSR 100 – This road provides connectivity from CR 19 to the Slide Lake area and the unique recreational experiences of Wurts Ditch. The winding route that follows Wurts Ditch to its headwaters and the option to cross over into the Eagle River watershed is unique and unmatched in the Pike & San Isabel National Forest. This age old ditch with its construction along the contours and ditch side road provides a distinctive perspective of the area and the historic times that built the ditch. This area remains popular with multiple user groups including UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers.

**Below are specific comments relating to the routes within the Pikes Peak Ranger District:**

1. Recommend that the Environmental Assessment for the South Rampart Travel Management Plan (SRTMP) be revised (only if absolutely necessary) and approved or incorporated into Alternative D for those areas not affected by the Waldo Canyon Fire. That **Alternative B – The Preferred Alternative**, be implemented immediately for those roads and trails outside of the Waldo Canyon Fire area. That those roads and trails that are not subject to the stipulations of the Settlement Agreement (Civil Action No. 11-cv-00246-WYD) begin immediate planning and implementation. Recall that the Environmental Assessment for this project had **been completed** following extensive public comment and public involvement and most importantly received consensus among the various stakeholders. Funding for this project was even awarded to the Pikes Peak Ranger District specifically for implementation the SRTMP by the Colorado Parks and Wildlife OHV Grants Program! Specifically the Organizations seek immediate implementation of the previously proposed:
  - a. All “New single-track motorcycle trails” in the Rainbow Falls area,
  - b. The Motorcycle Trail Connection to the South Platte Ranger District
  - c. The proposed New Parking Areas in the Rainbow Falls area
  - d. The proposed High Clearance 4X4 Challenge Trails
  - e. The proposed New Open Riding Areas
  - f. The new Trailhead at Rainbow Falls (TH2) and the connection of multi-use access across SH 67 to connect the Rainbow Falls area with the North Divide/717 area. The Organizations specifically request that the Pikes Peak Ranger District consider immediately pursuing the connection for OHV use across SH 67 to connect the Rainbow Falls area with the North Divide/717 system. We believe this connection is best established in the vicinity of NFSR 343 and NFSR 349 with a corresponding connection between NFSR's 332.A and 350 (utilizing a bridge across Trout Creek).
  - g. The proposed ATV Trail (OHV 1) that parallels NFSR 313 to the east.





opportunities with the NFSR's 324, 325 and the NFSR 323 area, NFSR 322 and NFSR 320 and the NFSR 315, 314 and 321 areas. We would also request consideration of connections between NFSR 322 and NFSR 933 (<1 mi) and NFSR 933 to NFSR 323 (<1 mi) to provide enhanced looped opportunities.

5. The Organizations offer the following recommendations for the inclusion and additions of non-system single-track trails to the inventory of multi-use/motorized trails in the vicinity of the area and trail(s) known as the Cap'n Jacks area:
  - a. "Aqueduct trail". Near the Penrose-Rosemont Reservoir, parallel to CR 8 along the north side of the road, there is an existing trail that provides a single-track connection from NFSR 370.C (between the two intersections of NFSR 370.C and CR 8 and NFSR 370.C and 370.D) to NFSR 379. This proposed adoption of an existing trail follows along the southern and eastern flanks of Mount Big Chief and intersects with NFSR 379 just south of the intersection of NFSRs 379 and 379.E. This trail has been in existence for decades and provides a good loop and connection opportunity with other system NFSRs and NFSTs.
  - b. Penrose-Rosemont Reservoir single-track. Another existing, non-system single-track trail, which has been used for years by mountain bikers. This is an existing single-track trail that circles around the south side of the Penrose-Rosemont Reservoir. We would offer that this trail could and should be adopted as a multi-use, single-track system trail open to both mountain bikes and motorcycles. "Illegal" use of this non-system trail is likely to continue so it would seem logical to adopt it into the inventory with a multi-use/motorized designation.
  - c. Connection of NFSR 370.DA to NFSR 379. An opportunity exists to connect the northern end of NFSR 370.DA with NFSR 379 with a single-track multi-use trail. This short link provides a connection and additional looping opportunity for motorcycles.
  - d. High Park Connection. Similar to the proposed single-track trail connection described above, we also offer the suggestion to formalize a multi-use single-track trail connecting NFSR 370.C to NFSR 379 due north through Section 15, T15S R68W. There are already trails in this area that connect the High Park area with NFSR 370. C.
  - e. Bull Park, Bison Creek Trail. Recommend the adoption and conversion of existing trails in this area to multi-use single track open to motorcycles. This system would offer an excellent loop opportunity and connection of the western end of NFSR 376.A, down into the Bison Creek drainage, generally through the Cathedral Park area with an ultimate connection with CR 8 in the vicinity of Clyde. In Section 7 T15S R68W there exist numerous existing trails that could be utilized and developed into a system of parallel routes offering variety and differing levels of challenge.

6. NFSR's 311, 311.A and 313 were identified in the recent TAP as Low Benefit/Low Risk roads. It is important to note that this combination provides a very unique loop opportunity, which includes outstanding views of the Plains, the USAF Academy, and the surrounding area. Although usage of this particular road network is relatively low and seasonal, it does provide a valuable recreational experience with the associated views of the Plains along with the Rampart Range and Pikes Peak, but also its diverse terrain, rock outcroppings and challenge make this route special to OHV users. This route network also provides hunting access to several locations. We would support conversion of this network to Full Size Trails along with the consideration of an extension of NFSR 307.A to connect with NFSR 311 to provide an additional loop.
7. The Organizations would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to a Full Size Trail or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width). We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication. Specifically we suggest conversion of the following NFSR's to Full Size Trails or 50" wide trails:
  - a. 350.A (Convert to Full Size Trail)
  - b. 350.B (Convert to Full Size Trail)
  - c. 344 (Convert to Full Size Trail)
  - d. 343.B (Convert to Full Size Trail)
  - e. 340.B (Convert to Full Size Trail)
  - f. 344.B (Convert to Full Size Trail)
  - g. 348.B (Convert to Full Size Trail)
  - h. 370.C (Convert to Full Size Trail)
  - i. 370.D (Convert to Full Size Trail)
  - j. 370.DA (Convert to Full Size Trail)
  - k. 376.A (Convert to Full Size Trail)
  - l. 307.A (Convert to Full Size Trail)
  - m. 311 (Convert to Full Size Trail)
  - n. 311.A (Convert to Full Size Trail)
  - o. 313 (Convert to Full Size Trail)

- p. 322.A (Convert to Full Size Trail)
  - q. 346 (*if conversion to a Full Size Trail would keep the route open to public use*)
  - r. 357.C (Convert to 50" or Full Size Trail)
  - s. 357.CA (Convert to 50" or Full Size Trail) – *this route also needs to be formally connected to NFST 717 and eliminate the extremely short disconnection.*
  - t. 332.CA (Convert to 50" or Full Size Trail)
8. We request connection of NFSR's 340.B to NFSR 343.B along with a connection from the end of NFSR 340.B (at the intersection of 340.B and County Road 78) to NFSR 357. These very minor and small connections would provide and enhance the existing network of system roads and the connectivity between the North Divide area and the Rainbow Falls area. This proposed connection of NFSR 340.B with NFSR 343.B would also provide redundant access to the weather station. We would support conversion of all of these routes to Full Size Trails.
  9. NFSR 332.A as listed in Exhibit B of the Settlement Agreement (Civil Action No. 11-cv-00246-WYD) should be re-opened from partial length, interim closure. This particular segment of NFSR 332.A is elevated from the adjacent creek and riparian areas, and is upland from any potential Preble's Meadow Jumping Mouse habitat. It is our opinion that this particular road segment was improperly designated as encroaching into potential Preble's Meadow Jumping Mouse habitat and that encroachment or risk is just not applicable since the road is located a substantial distance upland from the riparian corridor. Use of this route should remain open and available for public use.
  10. Trails 717, 717.A, 717.B, 717.C, 717.D, 717.E and 717.F are all interrelated and provide a unique recreational, multi-use trail system unmatched anywhere else in the Pikes Peak Ranger District. The trail system's relatively easy access to the Colorado Springs area and southern Front Range provides the public with abundant opportunities to visit the post Hayman Fire burn area, view the natural post fire restoration mechanisms, view spectacular unfettered vistas of Pikes Peak, Mount Evans and the Rampart Range, and provides first class family and group camping and recreational venues. The 717 system encircles the North Divide area and provides the public with the access to multiple and different ecosystems and habitat's and the opportunities to view wildlife in natural settings. The 717 systems has the attribute to provide all day or partial day trail experiences and offers tremendous flexibility and options for the public to enjoy the Pikes Peak Ranger District. The trail network is vast and expansive and helps to disperse use rather than focus and concentrate the uses into small, over used areas. Along with the many dispersed camping sites, the trail system has unique qualities to provide multi-use and family oriented recreation close to nearby urban areas. The road and trail network associated with 717 is also a significant economic generator for the adjacent communities of Woodland Park, Divide, Deckers, and Florissant. Curtailment of any of these trails or any reduction of the multi-use

activities in this area would likely have significant economic consequences to these communities. These communities rely and depend upon the surrounding Pikes Peak Ranger District and all of the related recreational opportunities the District provides to forest visitors. Almost each and every forest visit begins with a trip through one of these small communities with related stops for food, fuel, lodging, etc. For additional, detailed information, the report Economic Contribution of Off-Highway Vehicle Recreation in Colorado, prepared for COHVCO by Pinyon Environmental is available upon request. The Organizations also support the identification of multiple parking/dispersed camping sites throughout the 717 system area in order to provide sufficient legal places for the public to park and camp. Special consideration should be given for recreational vehicles with trailers and large size vehicles.

11. NFSR 325 is necessary for connecting to NFSR's 325.A, 324.A and NFSR 324. This route provides a wonderful loop opportunity with either NFSR 324 and/or NFSR 323. NFSR 325 also provides seasonal access for the USAFA and their cadet training. NFSR 325 should remain open as is. We would support conversion of all of these routes to Full Size Trails.
12. NFSR's 300.C, CA and CB provides access into the East Plum Creek area and is a popular access route for hunters. These routes should remain open as is and we would support conversion of these routes to Full Size Trails.
13. All routes within the Rainbow Falls area and especially those listed in Exhibit A of the Settlement Agreement should remain open and considered for conversion to Full Size Trails. We acknowledge that this area receives extremely heavy and concentrated use and that the recreational benefit and sustainability of many routes could be improved. However, any reduction in the density of roads and trails in this area would have detrimental effects and only result in increased concentration of use onto the routes that remain open. This single area with its diversity of trails and multiple dispersed camping sites, provides unique opportunities for families desiring to camp and recreate together, for visitors seeking a compact and close in network to explore, and the special opportunity this area provides with its connectivity to the expansive road and trail systems in the South Platte Ranger District. Special emphasis should be given to NFSR's 344, 348.B, 348.C, 347.C, 631, 633, 634, 350.A, 350.B and 348. We would also offer that the routes in the northern portion of Rainbow Falls, primarily the NFSR 332 series, offers a very special recreational opportunity for beginning riders, families with younger children and "side by sides"/ROV's. This very compact network of roads, with its mild terrain and relatively low use really does provide visitors with a great place to teach, learn and practice proper and safe OHV riding skills. We would support conversion of the NFSR 332 series of routes to Full Size Trails. Finally we would request that the Pikes Peak Ranger District consider establishing open riding and play areas within the Rainbow Falls area for special users such as Trials bikes and rock crawling (e.g. the former quarry site off of NFSR 350.B).

14. NFSR 366 for its entire length, but especially between NFSR 366.A and County Road 3 provides a popular, useful and sole northerly connection to the Trail Creek area and the surrounding network of roads and trails. NFSR 366 provides the only access to the North Divide and 717 system from the northern end of Trail Creek Road/CR3 and serves as a primary connection to the network for the West Creek area/residents. Closure of this route would likely force all eligible users to connect via 717 (assuming 717 is left intact and open) which is more than a mile further to the west, and 717 is not open for vehicles over 50" wide. Forcing users to a sole access at 717 is just not a sustainable alternative given its westerly location and current conditions. There is a need for parking and other trailhead facilities at the new/revised 717/CR 3 intersection. NFSR 366 provides the primary and a sole loop opportunity between the NFSR 364/Manchester Creek area, the Trail Creek area along with the NFSRs 364/362 route. Loop opportunities are already in short supply and especially limited for the full spectrum of trail users. This area will also benefit from additional designated parking areas and dispersed camping sites.
15. NFSR 358 is the sole and primary full size vehicle, east west connector between NFSR's 357 and 364. This road also provides an alternative access to the private, inholding property located in Section 30, T11S, R69W. This route provides the vital linkage between NFSR 357 (AKA Rule Ridge) and routes and destinations to the west to include Trails 717, 717.A, 717.B, NFSR's 364, 365, 366, 362, CR 3 just to name a few.
16. NFSR 341.A and 341.B provides access from an informal trailhead(s) and dispersed camping sites along CR 78 (AKA Painted Rocks Rd) and CR 782 (Quinlan Gulch). NFSR 341.A provides one of the only bona fide access points from the Quinlan Gulch area and allows those residents a legal and convenient point of access to the 717 and the North Divide system. The intersection of CR 78 and NFSR 341.B has seen steady growth in forest visitors using that area as an access point and trailhead, distributing the use from the CR 78 and NFSR 357 access point and to some degree from the Rule Ridge and Lower Trout Creek Trailheads. Multiple parking areas and dispersed camping sites are needed in this area.
17. NFSR 308 (located in Section 22) has the potential to allow a future connection from CR 25 to the 717 and North Divide system. The City of Woodland Park has considered this connection for several years as the best opportunity for a future connection between the City and the multi-use North Divide trail system (via the portion of CR 25 owned and maintained by the City). We are aware that the City and USFS have had informal discussions regarding this future connection and it will be extremely important that NFSR 308 remains open and accessible to the public for this connection to have a chance of one day coming to fruition. We do not support permanently closing or converting this route to Admin Use Only. NFSR 308 should actually be considered for an extension to the north and west to connect NFSR's 354.B, 354.A and 357.F to provide

additional loop opportunities. We would support conversion of all of these routes to Full Size Trails.

18. NFSR 359.M provides a link and alternative for licensed motorcycles to connect from 717 to CR 51 and provides access to private property. This route is often used to make connections to the Divide area for refueling, meals, etc. This comment similarly applies to NFSR 363.E.
19. NFST's 634, 633 and 631 should remain as is and open to public motorized use in order to maintain the associated looped trail opportunities and the connection(s) to the trail network in the South Platte Ranger District.
20. NFSR 360.B was closed in 2012 and should be re-opened and remain available for public access. This popular road provided access to numerous camping areas and did see very heavy use during the summer recreational season. We would support conversion of this route to a Full Size Trail.
21. The Organizations would request that the previous decision to close NFSR's 366.A, 366.B & 366.D, 363.A, 984, 343.A and 343. C be reconsidered and re-opened. In particular the closing of NFSR 343.A and 343.C eliminated a rare loop opportunity and has concentrated any and all use onto NFSR 343. That the reasons cited during the previous decision process regarding unsustainability of NFSR 343.C could be mitigated with a minor reroute. All of these closures, along with similar closures (e.g. NFST 725, NFST 630, NFSR 980, etc.) have resulted in a net loss of mileage for multi-use and motorized recreation in the District. We would support re-opening and conversion of all of these routes to Full Size Trails.
22. The Organizations support the improvement of the route network consisting of NFSRs 370.D, 370.C and 370.DA for the purpose of providing extreme rock crawling opportunities. The recreational opportunities in this area could be improved by adoption of existing non-system links and connectors along with conversion to Full Size Trails.
23. The USFS has been a recognized supporter of the California Children's Outdoor Bill of Rights. Nationwide there are concerns about the youth of our country's lack of exercise, detachment from outdoor activities and limited access to public parks and land. The 717 trail system along with the associated network of roads and trails within the Pikes Peak Ranger District provides the necessary access and recreational opportunity for Colorado's and our local youth to explore nature, play in safe places, follow a trail, go fishing, camp under the stars, connect with the past and many of the other activities inspired by Richard Louv's book "Last Child Left in the Woods". Loss or closure of the 717 trail system and the associated roads and trails in the Pikes Peak Ranger District would certainly be a tragedy and lost opportunity for our area's youth to be able to connect to and be exposed to nature.

## Below are specific comments relating to the routes within the Salida Ranger District:

1. We understand the popularity and regional importance of the Four Mile Trail System near Buena Vista. We also understand that this area has seen increased use by all types of users and that the use of this area will continue to grow.
2. We would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width) whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.
3. The seasonal closures proposed for Bear Creek, the Rainbow Trail, and others are not consistent with other seasonal closures within the district (for example, the Cottonwood MTB trail, 12/15-3/15). In addition, the closures affect only motorized users, which is inconsistent with best available science for protecting habitat. The District should strive for consistency of closure dates with other trails in the district (the Organizations generally support a closure period of 12/15-3/15 for the specific roads and trails that absolutely require seasonal closure), and should make the closures universal to all users. Wherever possible, if the conditions on the ground are likely to represent an effective barrier to travel, the District should avoid making a seasonal closure that will create confusion and create an unnecessary enforcement burden.
4. The importance and unique multi-use recreational qualities of the Rainbow Trail cannot be overlooked. Although NFST 1336 (AKA The Rainbow Trail-Salida Ranger District) was not specifically listed in Exhibit A of the Settlement Agreement, we feel this trail is vitally important to meeting multi-use recreational needs and demands of the area. We support the District's efforts, past and present, to maintain this trail and especially the needs for routine and continued "heavy maintenance".
5. NFSR 102. - This route needs a legal connection to provide good access to NFST 1336 (AKA Rainbow Trail). All trail users will benefit from this connection.
6. NFSR 108. - This route is a common "loop" off of the Rainbow Trail from both NFSR 101 & NFSR 124. NFSR 108 is the most direct access to the Rainbow Trail from Salida. This route also provides access to private land and is the road to the radio towers on Methodist Mountain.



7. NFSR 186. - This route makes a nice loop with NFSR's 186.B and 174.A. User groups include mountain bikes, motorcycles, UTV's, ATV's, jeeps, and hunters.
8. NFSR 205. - This route provides a good exit/entrance to the far western part of the Rainbow Trail without using HWY 285/Mears Junction access. Allows users to loop off the Rainbow Trail back to NFSR 201.
9. NFSR 218. - This route provides easier access to Lost Creek and is popular with hunters, mountain bikers, UTV's, ATV's, motorcycles and hikers.
10. NFSR 225. – Extension of this route would provide an important and vital connector and option for motorized users. It would provide an alternate route to HWY 50 and the very popular crest trail and/or loops off of Monarch Pass and the Continental Divide Trail. Also see comments regarding NFST 1412.
11. NFSR 234. - This route is the Monarch Ski Area Parking Lot, this remains important to facilitating access to the Monarch Ski Area
12. NFSR 235. - This route leads to Boss Lake, which is a very popular route for many OHV users including jeeps, UTVs, ATVs, motorcycles and non-motorized users as well. Many users utilize this route to access Boss Lake for fishing, camping, and hunting. We would support conversion of this route to a Full Size Trail.
13. NFSR 273. -This route accesses the very popular hiking trail in Raspberry Gulch. Other uses include dispersed camping, mountain biking, hunting and fishing access. We would support conversion of this route to a Full Size Trail.
14. NFSRs 279 & 348. - This route provides access to private land and mining claims and provides a challenging route for many OHV's and Jeep users. Hunters also find this route valuable for their access. We would support conversion of these routes to Full Size Trails.
15. NFSR 101.A. - This route provides access to dispersed camping and is often used during hunting season. We would support conversion of this route to a Full Size Trail.
16. NFSRs 180.A & 180.B. - These routes make a loop. The routes are moderately difficult and are uses by UTV's, ATV's, jeeps, motorcycles, equestrians and mountain bikes. We would support conversion of these routes to Full Size Trails.
17. NFSR 181.A. - This route provides access to a popular landmark called "The Crater" and is used by almost every user group. We would support conversion of this route to a Full Size Trail.

18. NFSR183.A. - This route leads the public to stunning views of the Upper Arkansas Valley. Like NFSR 181.A this route provides access for all user groups. We would support conversion of this route to a Full Size Trail.
19. NFSR's 200.D, 202.D. – Although this road is a short Dead End, it remains a very popular, flat and easily accessible dispersed camping spot used by hunters, anglers, OHV users, mountain bikes, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
20. NFSR's 200.E, 200.F, 203.B, 203.C, 204.B, 204.C, 204.D, 204.E, 212.A, 212.B, 222.A. - Short routes that provide access to dispersed camping sites popular with multiple user groups including; hunters, anglers, OHV, mountain bikers, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
21. NFSRs 201.A, 201.AA, 201 CA, 201.CB. - Short routes that provide much need access to dispersed camping sites. All near the historic town site of Shirley, which is an extremely popular multi use recreation Trail Head. Users of this area include all groups including hunters, anglers, OHV, mountain bikers, hikers, equestrians and campers. The proximity to this historic town site along with the former Denver and Rio Grande Western Railroad's Marshall Pass roadbed and the access that is provided from this area to many popular trails and roads makes this area and the associated trails vitally important to all forms of recreation. We would support conversion of these routes to Full Size Trails. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.
22. NFSR's 214.A & 214.AA. - This route provides access to a small tributary stream of Pass Creek and access to the dispersed camping route of 214.AA. This route provides access for all user groups. We would support conversion of these routes to Full Size Trails.
23. NFSR's 214.F, 225.D, 225.E, 228.A, 344.H, 344.I, 365.B, 365.C, 373.B, 373.C, 375.AA. – Provides access to dispersed camping sites popular with multiple user groups. We would support conversion of these routes to Full Size Trails.
24. NFSR 237.B. - Provides access to dispersed camping sites with easy access from NFSR 237 popular with multiple user groups. We would support conversion of this route to a Full Size Trail.
25. NFSR's 240.F & 240.G. - These two routes provide access to dispersed camping sites along the very popular NFSR 240 and to North Fork Reservoir. This area remains popular with multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.

26. NFSR 250.AA. - Enables access to dispersed camping in close proximity to the popular Mt. Shavano Trail Head. This area has multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of this route to a Full Size Trail.
27. NFSR 250.B. - This short route provides additional access to Squaw Creek and we would support conversion of this route to a Full Size Trail.
28. NFSR's 267.B, 267.C, 267.D, 267.E, & 267.F. - These routes all allow access to dispersed camping along the very popular NFSR 267 (Tin Cup Pass.)
29. NFSR 272.B. - This route makes a loop and is in close proximity to the Brown's Creek Trail Head. Dispersed camping opportunities exist along this route and are used by multiple user groups. We would support conversion of this route to a Full Size Trail.
30. NFSR's 272.E, 272.F, 272.G & 274.B. – These routes provide access to dispersed camping in close proximity to the very popular Browns Creek and Raspberry Gulch Trail Heads. This area is very popular with multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
31. NFSR 278.C. - The route makes a good connector/loop with NFSR's 278.A & 278.B. Popular with multiple user groups. We would support conversion of this route to a Full Size Trail.
32. NFSR's 308.B2, 308.E, 308.F, 308.G, 315.A, 315.B, 315.C, 315.D, 376.AA, 376.AB, 376.AC, 376.D, 376.E, 376.G, 376.H, & 376.I. – These routes allow access to dispersed camping sites in close proximity to the 4 Mile Recreation Area, a designated OHV area, but also popular with multiple user groups. We would support conversion of these routes to Full Size Trails. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.
33. Near the 4 Mile Recreation Area is a designated trail Open to Motorcycles Only (NFST 1425, AKA Triad Ridge). This trail is a wonderful recreational asset but it should be noted that a motorcycle rider with average skill, is able to traverse the entire trail in a very short amount of time (e.g., about 15 minutes). Suggest that additional Motorcycle Only opportunities be provided in this area to develop a valuable, enhanced and satisfying recreational experience. Expansion of the recreational opportunity for motorcycles could be accomplished rather effortlessly through the adoption of historic "non-system" trails in the area with select modifications (e.g., re-routes, maintenance, etc.) to ensure an enduring and sustainable system of motorcycle trails.
34. NFSR 311.D. - This short route provides access to Seven Mile Creek and we would support conversion of this route to a Full Size Trail.

35. NFSR 322.A. - This route is an extension of a route that accesses private land and/or a mining claim/radio/cell towers.
36. NFST 1412 (AKA Greens Creek). - This trail is the prime remaining motorized single track on the east side of the Continental Divide Trail within the Salida Ranger District. Trail 1412 provides an important and vital access to the Crest Trail and access to the historic town site of Sargents and the surrounding area's trail system. The trail provides relief from the Crest Trail during high use times for motorized single-track users and offers loops from both Monarch and Marshall Passes. We would also offer that an opportunity exists to provide a loop opportunity by connecting NFSR 225 to the Crest Trail. This would provide a loop with Trail 1412. We understand this connection would require some effort to complete but should be a consideration for future planning to enhance recreational opportunities within the District.
37. To enhance and improve loop connectivity and opportunities, the District should consider incorporating a historical route connecting the Marshall Pass area (NFSR 204/204.A) to NFSR 210.

**Below are specific comments relating to the routes within the San Carlos Ranger District:**

1. We would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width) whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.
2. NFST 1300. - Indian Creek. Cuchara area. (14 miles). This 14 mile multi-use trail is located outside of Laveta. The trail system starts at the popular Bear Lake Campground. It has become a popular trail for all user groups. It is popular with equestrians, ATV's, Motorcycles, hikers, and mountain bikers. The area is also very popular with out-of-state tourist given the diversity of license plates in the parking areas. This trail provides stunning views of the Culebra Range and the Spanish Peaks.
3. NFST 1300.A. - Cuchara area. Multi-use area. This trail acts as a cutoff or short cut from Dodgeton Trail (NFST 1302) to Indian Creek Trail (NFST 1300). This trail remains valuable and provides a fulfilling experience for multiple user groups.

4. NFST 1302. - Dodgeton Creek Trail (5 miles). Cuchara area. Multi-use trail. This trail contains an important pay-for-use trailhead that leads to the main Indian Creek trail. It provides a convenient access point from Historic Scenic Byway 12. This trail is highly valued by all user groups as it leads to the rest of the trail system and the Baker Trail (NFST 1301, a highly regarded segment of single-track). Without the Dodgeton Creek Trail, users would have to drive several miles south and travel up to the Blue Lake Campground.
5. NFST 1302.A & 1300.B. - Cuchara area. Important multi use trails.
6. NFST 1314. - East and West Cisneros. San Isabel Lake Area. Multi-use trail. Keeping multi-use and motorized access to this trail will be very important. On the ground, this trail will benefit from improved signage. This route is VERY important to help make connections to the following trails: Snowslide (NFST 1318), St. Charles (NFST 1326), Pole Creek (NFST 1398), Horse Ranch (NFST 1397), and West Cisneros. Without East Cisneros, your route options are extremely limited. Multiple trail user groups utilize this trail. Hunters use this trail to access the top of Greenhorn during the early and mid-summer to scout for game. If users had to drive to the top of Greenhorn via the road system, it would take an additional hour of driving time. It may be appropriate to consider gates to control seasonal (e.g. early season) travel. NFST 1314 East provides enjoyable obstacles and an opportunity to visit the remains of an airplane. NFST 1314 West offers fantastic views and a unique opportunity to travel along a shelf road.
7. NFST 1318. – Snow Slide Trail. Provides a connection between Hwy 165 and NFSR 369, which enables a looped opportunity with NFST 1314. Although very technical, this route provides an appropriate level of challenge for those desiring that recreational experience.
8. NFST 1319. - Wachob Tr. (1mile). Motorized single track. San Isabel Lake area. This is an inspiring but short piece of single-track that starts from NFSR 380 and ends at an overlook. The overlook contains a large American flag with stunning views of San Isabel Lake and the surrounding mountains. Although this trail is short, it is highly valued because of its flowing, winding pattern and it leads to scenic views. This is a great place for beginners to experience your natural surroundings on a motorcycle. It is located close to the new Boy Scout Ranch and is frequented by equestrians, motorcycle trail riders, and hikers.
9. NFST 1320. – This trail provides an excellent single-track connector from Hwy 78 to NFSR 320 and CR 243. The route provides a diverse level of challenge with technical switchbacks, rocky crossings and an enjoyable hill climb up to NFSR 320.
10. NFST 1321. – South Creek Trail. Connects Hwy 165 to Squirrel Creek via NFST 1386 for a nice loop back out to Hwy 165.

11. NFST 1322. - 2nd Mace. Multi-use trail. San Isabel Lake area. Multi-use trail. This trail is of high value because it allows users to access several other trail systems to include: 2nd Mace Spur Trail (NFST 1322.A, multi-use); Dome Rock (NFST 1387 single-track); Silver Circle (NFST 1323); and Middle Creek Trail (NFST 1388). A diverse variety of user groups are able to access a series of trails from the 2nd Mace Trail Head. Many hunters, equestrians, hikers, motorcycles, and ATV's utilize this parking lot.
12. NFST 1322.A. - 2nd Mace Spur. (.9miles). Multi-use trail. Lake Isabel area. This trail is located .9 miles from the 2nd Mace Trail Head. The trail ends at Bishop's Castle, which is just off from Hwy. 165. Bishops Castle is a huge tourism draw and this trail allows all users the opportunity to visit this popular attraction.
13. NFST 1323. - Silver Circle. (4.6 miles). Multi-use trail. Lake Isabel Area. This is a spur trail that can be accessed from NFSR 383 OR 2nd Mace to Middle Creek NFST 1388. Silver Circle Trail includes a scenic spur that is 3.3 miles in length. One of the trail's many attributes, is the stunning views of the Beulah Valley. This trail is important to equestrians, long distance hikers, ATV's, and motorcycles. The dense forest, winding trail and low-grade slopes provide an epic trail riding experience. Enthusiasts would like to see future connectors on the east ends of NFST 1321, NFST 1384, NFST 1322, NFST 1323, and possibly NFST 1325 (approximately 8 mi in length).
14. NFST 1325. - Left Hand Fork. (2.1 miles). Multi-use trail. Lake Isabel area. Left Hand fork can be accessed by riding through the 2nd Mace Trail, to Middle Creek Trail (NFST 1388), to Silver Circle Trail (NFST 1323) and through NFSR 383. Users can also access this trail from Hwy. 165 to NFSR 383 (Bigalow Divide). This is a dead-end trail but does navigate to the upper banks of a draw. It is used for some hunting access and OHV recreation. The historic Mingus Cabin is an exciting highlight along the way.
15. NFST 1326. - St. Charles Trail. (*Quotes from enthusiasts: "Ah! The Flagship!" "What single-track is all about"*). Motorcyclists really enjoy this trail. Tight, rocky, steep, and tough switchbacks make this a top rated trail. Connects Hwy 165 to NFST 1314. Also connects to NFSR 335 to make three different loops.
16. NFST 1329. - Lions Trail. Enthusiasts enjoy this moderately difficulty trail necessary for connecting to NFST 1334 and NFST 1333. Connects the top of the mesa at NFSR 274 with Oak Creek Grade, CR 143.
17. NFST 1331. - Lewis Creek. Connects with Hwy 96 via NFSR 310 and follows Lewis Creek past Holt Mtn. to NFSR 315. NFSR's 336 and 274 can be used to connect to Hwy 271 and 96 to complete a loop. This is a great trail with lots of switchbacks and excellent views.

18. NFST 1333. - East Bear/Tanner Peak Trail. (9 miles). Multi use leading to motorized single-track. Canon City area. This trail is a favorite for Canon City locals. Located only a few miles out of the city limits, it is popular with ATV's, motorcycles, equestrians, and hikers. The trail offers a predominately low-grade climb to Tanner Peak. Once there, users have access to some breathtaking views of the snowcapped Sangre De Christos. This trail is very important to hikers and the motorized enthusiast that are looking to challenge their technical skills.

19. NFST 1333. A. - (.25 miles). Multi use. Canon City Area. Short but popular trail that leads to a scenic overlook of the Sangre De Christo mountain range.

20. NFST 1334. - Stultz. (5.72 miles). Multi use. Canon City Area. You can access this trail via Tanner Trail NFST 1333 or from the Stultz Trail Head. This trail helps make a great connection with Tanner. The trail is popular with a variety of users and is especially important to local motorized recreation.

21. NFST 1336. - Rainbow Trail. Westcliffe south to the Sand Dunes (Alvarado to Medano Pass). This cherished multi-use trail is one of the true gems within the San Carlos Ranger District. This trail is extremely popular with, and valued by nearly every user group including motorized users, hikers, anglers, equestrians just to name a few. This trail is also very popular for licensed motorcycles, who choose to use this trail system to make an extended scenic trip via the Rainbow Trail to Medano Pass, and then into the Sand Dunes area. The trail provides backcountry anglers access to the many high



elevation lakes that dot the Sangre De Christo Wilderness. During the fall the trail is popular with hunters using both motorized means and horses to access their favored hunting areas. The views along the trail are stunning. The District has invested substantial resources into this trail to provide bridges and other water crossing structures that have improved the sustainability of the trail corridor.

22. NFST 1380. - Bear Creek Trail (1.5 miles). San Isabel Lake area (west side of Greenhorn Rd.). Multi-use. This trail is a short trail extension off from Pole Creek Trail (NFST 1398). It is important to both hunting interest and motorized recreation. This trail needs to be extended to NFSR 419. Although the terrain can be steep and rocky, one mile separates this trail from NFSR 419. This would provide an improved experience for all equestrian, mountain bike, and motorized users. It would also allow users to make a loop that includes some very nice multi-use single track (Horse Ranch Trail, NFST 1397). This trail also provides hunters with a base for scouting purposes.

23. NFST 1384. - Squirrel Creek Trail. (5.1 miles). San Isabel Lake Area. Multi-use trail. *This is a trail that is extremely important for motorized access!* This trail ensures a high quality trail-riding experience by allowing loops and linking of trails on the east side of Hwy. 165. The trail links some of the area's most desirable motorized single track (South Creek Trail (NFST 1321) and Dome Rock Trail (NFST 1387). The trail contains a mix of small to medium sized rocks with long sections of decomposed granite. Historically, Squirrel Creek was a road that was popular with tourist throughout the 20's and 40's. A great ride and historical experience as well. Remains of bridges, picnic areas, and early guardrails are easily visible. It was the first national forest campground in the country. The foundations of an old hotel with Info signs are very interesting.
24. NFST 1386. – Provides connection between South Creek Trail (NFST 1321) and the Squirrel Creek Trail (NFST 1384). Excellent single track.
25. NFST 1387. - Dome Rock Trail. Connects South Creek Trail (NFST 1321) to NFST 1322 providing a very nice loop opportunity.
26. NFST 1388. - Middle Creek Trail. Multi-use trail. Lake Isabel area. Highly valued for all trail user groups. This trail provides an important link from 2nd Mace trail (NFST 1322) to the Silver Circle Trail (NFST 1323), and Left Hand Fork Trail (NFST 1325).
27. NFST 1396. - Snow Slide Spur. (.9 miles). Motorized Single track. Links lower Snow Slide NFST 1318 to Lake San Isabel. This is a great route to finish a decent down the classic Snowslide trail. This trail provides the user with a mix of lush ground vegetation and thick-forested switchbacks. This section of trail is highly valued by the motorized community and allows access to a trailhead within the Lake Isabel recreation area. The Rocky Mountain Trials Riders have also used this portion of the trail for their Ute Cup series.
28. NFST 1397. - Horse Ranch Trail. This trail provides a connection with NFST 1398 and NFSR 419 and enables a loop to be made. This trail provides users with some narrow single track and off camber riding challenges.
29. NFST 1398. - Pole Creek. (4miles). Lake Isabel Area. Multi-use trail. This is an important trail to all user groups. It helps provide a loop route when combined with NFSR 630 to West Ciscneros Trail (NFST 1314). In the middle of this trail, users can access Bear Creek Trail (NFST 1380). Many hunters utilize this trail as a base to scout the surrounding area. At the lower elevations, thick scrub oak patches hug the trail. The trail provides stunning views of Gardner and the Westcliffe area. The Rocky Mountain Trials Riders have also used this the trail for their Ute Cup series.



## Below are specific comments relating to the routes within the South Park Ranger District:

1. We would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width) whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.
2. The roads and trails in the vicinity of the Horseshoe Campground (AKA Sheep Mountain) provide some of the only motorcycle single-track opportunities in the District (e.g. NFSR's 691,740, 660, 739, etc.). We encourage the District to continue their efforts to maintain and improve this valued (and unique) system and network. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.
3. NFST 717 on the far eastern border of the District provides a unique recreational, multi-use trail system that is legendary within the Pike & San Isabel National Forest. This extensive interconnected trail system has easy access to the Colorado Springs area and southern Front Range and provides the public with abundant opportunities to visit the post Hayman Fire burn area, view the natural post fire restoration mechanisms, view spectacular unfettered vistas of Pikes Peak, Mount Evans and the Rampart Range, and provides first class family and group camping and recreational venues. The 717 system encircles the North Divide area within the adjoining Pikes Peak Ranger District and provides the public with the access to multiple and different ecosystems and habitat's along with the opportunities to view wildlife in natural settings. The 717 systems has the attribute to provide an all day or partial day trail experience and offers tremendous flexibility and options for the public to enjoy the combined South Park and Pikes Peak Ranger Districts. The trail network is vast and expansive and helps to disperse use rather than focus and concentrate the uses into small, over-used areas. Along with the many dispersed camping sites, the trail system has unique qualities to provide multi-use and family oriented recreation close to nearby urban areas. The road and trail network associated with 717 is also a significant economic generator for the adjacent communities of Woodland Park, Divide, Deckers, and Florrisant. Curtailment of any of these trails or any reduction of the multi-use activities in this area would likely have significant economic consequences to these communities. These communities rely and depend upon the surrounding National Forest Ranger Districts and all of the related recreational opportunities the Districts provide to forest

visitors. Almost each and every forest visit begins with a trip through one of these small communities with the related stops for food, fuel, lodging, etc. For additional, detailed information, the report [Economic Contribution of Off-Highway Vehicle Recreation in Colorado](#), prepared for COHVCO by Pinyon Environmental is available upon request. The Organizations also support the identification of multiple parking/dispersed camping sites throughout the 717 system area in order to provide sufficient legal places for the public to park and camp. Special consideration should be given for recreational vehicles with trailers and large size vehicles.

4. NFSR 44 (along with NFSRs 213 and 227) provides an important east-west connection across La Salle Pass. This route is an important multi-use/OHV connection from the Badger Flats area (and the adjacent Front Range) into South Park and destinations beyond. This route provides a primary connection and corridor between the Front Range and the Mosquito and Ten Mile Ranges. We cannot understate the importance of this route and continued unencumbered public access. The Organizations would support conversion of this route to a Full Size Trail.
5. We request that the District consider establishing open riding areas specifically for trials motorcycles in the Badger Flats area (e.g. Thorpe Gulch) and in the Sledgehammer area (south and east of Elevenmile Reservoir, near the intersection of NFSR's 243.2A and 243.2B, in an area near the end of NFSR 243.2B.).
6. Per comments previously submitted regarding the Badger Flats Management Project, we again encourage the District to enhance multi-use and motorized recreation in the Badger Flats area through the development of additional looped route opportunities. One example would be to consider creating & enhancing a larger loop opportunity as follows:
  - a. Begin near the intersection of NFSR 213 and PRK-31, travel east on NFSR 313 to PRK-77
  - b. North along the north side of PRK-77
  - c. Along NFSR 212.A to NFSR 212
  - d. Consider a new connection from the intersection of NFSR 212 and PRK-77 west to the intersection of PRK-31 and NFSR 231
  - e. Connect NFSRs 231 and 230 with an extension of NFSR 227.1A to 232
  - f. Connect NFSRs 275 and 213
7. Create a parallel multi-use and OHV route along PRK-31 to connect proposed future designated dispersed camping areas near Round Mountain (NFSR 223) with NFSR 213.
8. The steep section near the southern end of NFSR 295, just north of the gate near the intersection of NFSR 295 & 296 would benefit from slope maintenance and or consideration for re-routing to increase sustainability of the road.

9. Consider adding a route from the northwest end of NFSR 231 where it terminates near Burns Park and connect to NFSR 237.A. Adding this trail will connect the Badger Flat system to the Tarryall network, therefore enhancing recreational opportunities and experiences. It should also be noted that the route system in the vicinity of Packer Gulch (NFSR's 144, 239, 236, 237 and others) along with the routes around Baker Mountain (NFSR's 146, 149, etc.) provide numerous and desirable multi-use route opportunities for the Tarryall Reservoir area. A connecting route is needed between NFSR 146 and NFSR 239. It will be important to maintain these routes in the inventory and motorized access to the public. These routes could be candidates for conversion to Full Size Trails in lieu of keeping them on the District's road inventory.
10. The area served by NFSRs 204 and 212, commonly known as the China Wall area has been and will continue to be a popular recreational opportunity especially for full size 4WD vehicles. These routes provide a good diversity of challenge and obstacles for both beginners and experienced drivers and are often used to help educate users on how to properly use and traverse a challenging route. The area provides a good combination of route and stopping locations for breaks and lunch outings. This area also provides early and late season recreational opportunities and helps disperse use from the Badger Flats and South Platte River/Gulches area. Consider a connection of the dead end leg of NFSR 204/212 back to NFSR 204 to provide an enhanced loop opportunity. All routes in this area we would support as candidates for conversion to Full Size Trails.
11. NFSR 270 along the flanks of Thirtynine Mile Mountain provides the only access to the northwest slope of Thirtynine Mile Mountain and is an important link for recreational access to the area. This road provides a connector from the Elevenmile Reservoir area and around Thirtynine Mile Mountain to SH 9, then across SH 9 toward the Dicks Peak and Black Mountain area. It will be important to keep this corridor in place for multi-use/motorized access and open for both recreational users and hunters. Likewise for the entire length of NFSR 108 from SH 9 to Road 107. This road provides the primary access from SH 9 southwest towards the Black Mountain area. This route is also popular with Dual Sport motorcycle riders desiring to connect with the Salida Ranger District. NFSRs 108 and 107 may be candidates for conversion to Full Size Trails.
12. The roads and trails in Hackett, Longwater and Metberry Gulches along with Coral Creek (AKA The Wildcat Canyon Area) have long been enjoyed by enthusiasts and recreationists and were a longtime favorite for access to the South Platte River. **The Organizations would support conversion of these roads to Full Size Trails** (*specifically we request that NFSRs 220, 221 and 220.A in Park County be converted to Full Size Trails*). Since the devastation of the Hayman Fire, many organizations, clubs, individuals and others have partnered and worked diligently together to help restore this area with the hopes of one day seeing access to the area restored as it was

before the fire. The partnership between the local County Governments, the USFS, State agencies and the recreational users groups may all be looked to as a “good example” of folks working and cooperating together to restore recreational opportunities for the public. Restoring this access, similar to what was available before the Hayman Fire, will also help restore the recreational opportunities that existed in the area and the related economic benefits to the surrounding communities. All of these communities will certainly realize an economic benefit once access is restored to this area and across the South Platte River. Rather than allowing the fire to permanently take away a treasured resource from public use, the Organizations strongly support the reopening of these routes (e.g. as Full Size Trails) between all of the adjacent Ranger Districts and facilitating connections and loops along the east side of the South Platte River (e.g., connections between Longwater and Hackett Gulches). Deliberate efforts need to be made to provide environmentally friendly and sustainable crossings across the South Platte River. General and broad statements and accusations that the river cannot be crossed without impacts should not be used as justification to restrict access. Technical, engineered solutions to cross the river are indeed possible and must be explored, planned, designed and implemented.

13. Regarding the stipulations for the consideration of Seasonal Closures pursuant to Paragraph 4 of Exhibit B, for areas designated under the Forest Plan as 5B Big Game Winter Range Areas, we offer the following comments for the South Park Ranger District:
  - a. NFSR’s 44 (AKA LaSalle Pass), 44.2A and 44.2B provide the one and only route over La Salle Pass and the only east-west connection between the Badger Flats area and the South Park basin. A seasonal closure of this singular route will unnecessarily restrict access and the ability of the public to travel over La Salle Pass. La Salle Pass and the surrounding areas are all at lower altitudes and often provide recreational opportunities for periods much longer than many of the other routes that are stipulated for seasonal closure.

**Below are specific comments relating to the routes within the South Platte Ranger District:**

1. We understand the extreme popularity and regional importance of the Rampart Range Motorized Recreation Area along with the Webster Pass and Slaughterhouse Gulch areas. We also understand that these areas continue to see increased use by all types of users and that the use of the areas is likely to continue to grow.
2. We would encourage and support the District’s decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50” or less in width) whenever the primary purpose of the road

is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.

3. The importance and unique multi-use recreational qualities of the Rampart Range Motorized Recreation Area's vast trail system cannot be understated. We feel this extensive and very popular network of trails and the investments made in this system must be preserved and are vitally important to meeting the multi-use recreational needs and demands of the Denver Metro area. We support the District's efforts, past and present, *(and those of the Rampart Range Motorcycle Management Committee)* to improve and maintain this trail system. The District's history of diligently working to improve the sustainability of this area's network of routes and trails has been commendable.
4. The roads and trails in Hackett, Longwater and Metberry Gulches along with Coral Creek (AKA The Wildcat Canyon Area) have long been enjoyed by enthusiasts and recreationists and were a longtime favorite for access to the South Platte River. **The Organizations would support conversion of USFS roads in this area to Full Size Trails** *(specifically we request that NFSRs 221 and the lower end of NFSR 540 be re-opened and converted to Full Size Trails along with the approximate 1 mile segment of NFSR 205 in Douglas County be converted to a Full Size Trail)*. Since the devastation of the Hayman Fire, many organizations, clubs, individuals and others have partnered and worked diligently together to help restore this area with the hopes of one day seeing access to the area restored as it was before the fire. The partnership between the local County Governments, the USFS, State agencies and the recreational users groups may all be looked to as a "good example" of folks working and cooperating together to restore recreational opportunities for the public. Restoring this access, similar to what was available before the Hayman Fire, will also help restore the recreational opportunities that existed in the area and the related economic benefits to the surrounding communities. All of these communities will certainly realize an economic benefit once access is restored to this area and across the South Platte River. Rather than allowing the fire to permanently take away a treasured resource from public use, the Organizations strongly support the reopening of these routes (e.g. as Full Size Trails) between all of the adjacent Ranger Districts and facilitating connections and loops along the east side of the South Platte River (e.g., connections between Longwater and Hackett Gulches). Deliberate efforts need to be made to provide environmentally friendly and sustainable crossings across the South Platte River. General and broad statements and accusations that the river cannot be crossed without impacts should not

be used as justification to restrict access. Technical, engineered solutions to cross the river are indeed possible and must be explored, planned, designed and implemented.

5. Regarding the stipulations for the consideration of Seasonal Closures pursuant to Paragraph 4 of Exhibit B, for areas designated under the Forest Plan as 5B Big Game Winter Range Areas, we offer the following comments for the South Platte Ranger District:
  - a. NFSR's 811, 811.A, 811.B provide connections to NFSR 809 in the South Park Ranger District. This network provides connections and a loop opportunity between NFSR 123/CR 60 south to CR 37/54, which facilitates access to the unincorporated community of Jefferson, and Hwy 285. Similarly for NFSR 810 and the connectivity it provides between Hwy 285 and NFSR 809 to CR 37/54. This area and these routes are often very popular during the Aspen viewing months of September and October. These routes also provide access to dispersed camping sites and hunter access and we would support conversion of these routes to Full Size Trails. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.
  - b. NFSR 126 provides the sole and only access to North Twin Cone Peak. Public motorized access all the way to the top provides an important and unique experience. Likewise, NFSR 101 and 105 provide the only access to the Slaughterhouse Gulch area and the associated multi-use recreational opportunities there.

We thank you for reviewing and considering these comments and suggestions. The Organizations would welcome a discussion of these opportunities at your convenience. Our point of contact for this project will be William Alspach, PE at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259.

Sincerely,



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