



November 1, 2019

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**Pike & San Isabel National Forests, Public Motor Vehicle Use
Draft Environmental Impact Statement (DEIS) Comments**

Dear Supervisor Trujillo:

Please accept these comments regarding the Pike & San Isabel National Forests (PSINF) Public Motor Vehicle Use; Draft Environmental Impact Statement (DEIS) on behalf of the Trails Preservation Alliance (TPA), the Colorado Off-Highway Vehicle Coalition (COHVCO) and our affiliated clubs and groups. Recall that in 2011 both the TPA and COHVCO joined the PSINF as intervening partners to help defend against the lawsuit that began the MVUM Analysis Project. The TPA and COHVCO have both invested substantial financial resources since 2011 to defend the PSINF and the United States Forest Service (USFS). 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 multiple-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, multiple-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 multiple-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. Our affiliated groups include enthusiast clubs from the communities within the area encompassed by the PSINF. These clubs represent hundreds of enthusiasts that rely upon their members and volunteers to support a purpose that preserves, maintains and creates motorized trail opportunities for multiple-use recreation. The TPA, COHVCO and our affiliates are referred to collectively in this correspondence as "The Organizations." The Organizations offer the following comments and concerns regarding the project and recently released DEIS.

1. The Organizations would like to thank the employees and staff of the Pike & San Isabel National Forests, the United States Forest Service and the Contractor's staff for their work and completion of the Pike & San Isabel National Forests, Public Motor Vehicle Use; Draft Environmental Impact Statement (DEIS). The Organizations recognize and appreciate the substantial amount of work and effort that it has taken to accomplish this major milestone in the project.
2. During the review of the DEIS documents, the Organizations are compelled to note the following concerns with the documents provided for public review
 - a. The sheer volume of pages and sheets that make up the complete set of data and information presented in the DEIS is in of itself extremely large and overwhelming for a citizen to be expected to review and provide meaningful input and prepare comments on. With 5 separate alternatives and 5 map panels per alternative, a complete set of maps is 25 sheets. The DEIS document itself is 378 pages, again an intimidating volume of information for a citizen to review, comprehend and understand. Appendix C contains 70 pages of spreadsheets. Likewise should a citizen prefer to print the entire DEIS (*not including the Specialist Reports*) in a format suitable for reading, the printing cost alone is likely to exceed \$250.00 per copy (*color printing is required to discern data and information in figures and maps*).
 - b. The spreadsheets contained in Appendix C are formatted on pages with extremely small print. When printed on 11"x14" paper, the spreadsheets are still too small to be read and understood in a meaningful a manner.
 - c. The map sheets issued for Alternative C depict and show "new routes" on the maps that to the casual observer may incorrectly deduce that Alternative C includes those new routes, which is not the case. Albeit the Map Legend does list these routes as "Routes

not considered in this alternative” it is confusing and misleading and we see no value in depicting these routes on multiple alternative maps sheets.

- d. The map sheets for Alternative D are missing entire route line segments. For example, most of the 717-trail system on Sheet 1 of 5 is missing the actual route lines for the 717 trails. The labels (i.e. “717”) are present on the maps but the actual route lines are missing when both observed on a computer screen and when printed. Needless to say this will be confusing to members of the public when reviewing these particular map sheets.
 - e. The Organizations must question why the **Purpose and Need** for this project, as stated in the DEIS, was noticeably and substantially changed in the period of time between the publication of the Notice of Intent/Scoping Phase and publication of the DEIS. This change in **Purpose and Need** must be explained in detail to the public in the Final EIS.
 - f. The DEIS does not provide adequate or necessary information on proposed dates for Seasonal Closures which hampers the public’s ability to prepare and provide substantive and meaningful comments. On October 29, 2019 an email was sent out by the USFS with a link to a spreadsheet that listed proposed “seasonal closure dates”. This email was sent out just days prior to the deadline for DEIS comment submission. The spreadsheet contained 3,838 individual lines of information that the public was expected to review and provide comments on. This was an unreasonable and excessive request of the public on behalf of the USFS and PSI Project Team.
3. At this time, The Organizations generally believe that the proposed Alternative C satisfies the terms of the Settlement Agreement. **The Organizations provisionally support Alternative C with modifications (as outlined below) and as long as there are no additional closures, decommissioning, restrictions (e.g., seasonal closures, restrictions on motorized use, etc.) or conversion of the routes (as proposed in Alternative C) to Admin Use Only, Special Use Permit, or Maintenance Level 1. For the Organizations to support Alternative C the following modifications are essential and necessary to meet the stated Purpose and Need of this project. A brief summary of what we consider the essential additions and modifications to the Alternative C are provided below:**

Table 1

Summary of Specific Additions and or Modifications to Alternative C (Proposed Alternative)	
Leadville Ranger District	
“Keep as is” all segments of NFSRs 398, 398.B and 399 and do not convert to special use permit only.	Add all New Parking Areas as proposed in Alternative D to improve management of vehicle parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.
Pikes Peak Ranger District	
Add and designate new routes proposed in Alternative D; PA 7, 10, 13, 14, 16, 17, 28 and others in the Gold Camp Road area as Open to Motorcycles.*	Add and designate new routes proposed in Alternative D; PA 42, 43, 44, 54 and others in the Rainbow Falls area as Open to Motorcycles. (Re: South Rampart Travel Management Plan).*
Add the connection across SH 67 near Rainbow Falls, PA 25 along with New Trails 1 & 2 that connects NFSRs 340.B & 343.B with NFSR 357.	Keep NFSR 346 “as is” (i.e. Open to All Vehicles) with no seasonal closures and add PA 18 (route Open to All Vehicles) to connect NFSRs 346 and 300.F to help disperse use.
Immediately re-open NFSR 322A and re-establish the connection between NFSR’s 320 and 322 and convert to a Trail Open to All Vehicles or Open to Motorcycles Only. This action will re-establishes historic connectivity and provide historic and additional looped route opportunities.	Add all New Parking Areas as proposed in Alternative D to improve management of vehicle parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.
Eliminate the existing and proposed Seasonal Closure on Rampart Range Road, NFSR 300. Eliminate the existing and proposed seasonal closure on NFSR 376.A.	Add New routes PA 26, 32, 115, 63, 110, 111, 25, 26, 41, 46, 48, 51, 53. New Trails 1 & 2
Add new “Areas Open to Motor Vehicles” especially those previously planned in the South Rampart Travel Management Plan (i.e., PA 32 & PA 33)	
Salida Ranger District	
Add new routes PA 2 & PA 6 between NFSRs 204 & 210 to provide loops and connections.	Keep NFSR 349 (Grassy Gulch) “as is” for it’s entire length and eliminate the proposed decommissioning of the upper segment.
Add all New Parking Areas as proposed in Alternative D to improve management of vehicle	Keep NFSR 298.A (Williams Pass) as Open to Public Motor Vehicle use and eliminate all proposals to

parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.	convert to a non-motorized trail. Trail conversion to non-motorized use will eliminate connectivity with the west side of the Williams Pass route in the Gunnison Ranger District.
Reopen access for motorcycles to NFSR 225.F.	Remove existing or proposed seasonal closures on NFSRs 185.D, 101,108, 212 and NFST 1336.
San Carlos Ranger District	
Add new Trails PA 1 & PA 8. Add new "Areas Open to Motor Vehicles" (i.e., PA 9 & PA 15).	Add all New Parking Areas as proposed in Alternative D to improve management of vehicle parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.
South Park Ranger District	
Add new Routes PA 5, 11, 12 and 116	Add new Road 2
Re-establish public access and connectivity to Wildcat Canyon. Convert roads/routes on the western banks of the South Platte River to Trails Open to All Vehicles (e.g. NFSR 221, 220A, 220B, 540, etc.)	Add all New Parking Areas as proposed in Alternative D to improve management of vehicle parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.
Eliminate the existing and proposed Seasonal Closure on China Wall, NFSRs 212 and 212.A.	Keep NFSR 603 "as is" and open to public access.
Add new "Areas Open to Motor Vehicles" (i.e., PA 4 & PA 29)	
South Platte Ranger District	
Add new Road 3	Eliminate the existing and proposed Seasonal Slaughterhouse Gulch and Crow Creek, NFSRs 105 and 101.
Add new Trails 3 and 4	Re-establish public access and connectivity to Wildcat Canyon. Convert roads/routes on the western banks of the South Platte River to Trails Open to All Vehicles (e.g. NFSR 221, 220A, 220B, 540, etc.)
Add all New Parking Areas as proposed in Alternative D to improve management of vehicle parking, improve safety and reduce resource damages adjacent to roads and trails caused by unmanaged and unregulated vehicle parking.	NFSR 126 (aka Twin Cone), reopen and reestablish access to the upper section of the route, convert to a trail open to all vehicles (i.e. MP 5.13 to 7.37).

**The TPA and its affiliates will support the procurement of CPW OHV grants for the construction and maintenance of these trails and is willing to discuss future volunteer support and possible trail adoption.*

4. The Organizations do not and cannot support the proposed **Alternatives B and E** as they each seek to eliminate an excessive number of viable routes and neither alternative fulfills the Purpose and Need Statement for this project. Neither **Alternative B nor E** meets the needs for sustainable and proper forest, timber and fuels management along with motorized travel management and multiple-use recreation. Elimination of routes at the magnitude proposed by these two alternatives will not protect the environment, will not protect natural or cultural resources, and does not fulfill the originally stated Purpose and Need of this project “...to improve the management of motor vehicle use...” on the PSINF. **Alternatives B and E** do not achieve an improvement in management and do not provide even a minimal, basic or rudimentary access to the PSINF for management, timber or fuels management, access to private property, access to public and private utility infrastructures, access in times of emergency (i.e. search and rescue operations) and certainly not for the multiple-use recreational needs of a Forest(s) in such close proximity to major population centers like Colorado Springs, Pueblo and Denver. The Organizations must also emphatically point out the **Alternatives B and E** do not have a basis for their proposed changes and reductions to the roads and motorized trails network founded on scientific or other important and relevant data. The Organizations can not support **Alternative A** as it relies upon old, out dated information and does not adequately reflect current conditions and lacks planning for future needs and uses.

General Comments

1. As stated in Notice of Intent (NOI) for this project, the original 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 an 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 protect the forest resources and does not meet the needs of the recreationalists and other legitimate forest users. The Organizations must question why the **Purpose and Need** for this project, as stated in the DEIS, was noticeably and substantially changed in the period of time between the publication of the Notice of Intent/Scoping Phase and publication of the Draft EIS. This change in **Purpose and Need** must be explained in detail to the public in the Final EIS.
2. The Organizations believe it is appropriate and imperative to point out that the current Forest Plan for the PSINF is critically out of date, lacks the framework for current land management and inadequately provides relevant management guidance for the growing needs and demand for

multiple-use and motorized recreation, especially OHV recreational opportunities. That the current Forest Plan did not foresee, and therefore does not account for changes in technology such as e-bikes and a escalating growth of UTV/side-by-sides. Whereas the existing Forest Plan no longer contains “desired conditions” that are meaningful and realistic given the growth and expansion of the Front Range communities that border the PSINF and the associated needs of the citizens relying upon, using and recreating on the Forest. The Organizations would offer that subsequent planning documents, namely the **South Rampart Travel Management Plan (SRTMP)** prepared in 2011 more accurately reflects current and ongoing conditions and incorporated relevant and attainable desired conditions in addition to receiving substantial public support from affected user groups. One of the primary purposes of the SRMTP was to determine which motorized roads and trails in the South Rampart Planning Area were necessary to provide a diverse, functional and sustainable transportation system (similar to the purpose of this action). The SRTMP also sought to balance resource protection, public safety, current and anticipated future recreational use demands, and public and administrative access needs. Key issues that were already developed in the SRTMP and remain relevant to this action/project included¹:

- a. Trail sustainability and impacts of trail based recreation and dispersed camping to forest resources (i.e., soils, hydrology, wildlife, & vegetation).
 - b. Inadequate opportunities for trail-based recreation in the planning area.
 - c. Minimization of motorized/non-motorized user group conflicts.
 - d. Consistency of proposed uses with adjacent land uses and special management areas, including roadless areas and the Manitou Experimental Forest.
3. The economic impacts of multiple-use and motorized recreation within the counties and communities encompassed by or adjacent to the PSINF cannot and must not 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 PSINF. 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 season². As popular as motorized recreation is within the PSINF, the economic benefits to local economies and nearby communities must not be undervalued.

¹ Environmental Assessment, South Rampart Travel Management Plan (SRTMP), USDA Forest Service, Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands, August 2011, pg. 1-7, 2-1

² DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

The Organizations are supplementing the previously provided information on the economic importance of motorized recreation and access to public lands, both as an individual economic driver and as an important component of almost every other recreational pursuit on the PSINF. The Organizations believe that Alternative C recognizes the importance of multiple-use access to the PSINF for the basic existence of the many communities across the Forest. The newly released analysis from the U.S. Department of Commerce clearly identifies the economic importance of motorized activity as follows:³



When this analysis is reduced to the state level the U.S. Bureau of Economic Analysis (BEA) finds that recreational activities accounts for more than \$11 Billion in economic activity and more than 146,000 jobs.⁴

The negative impacts to the most important economic driver for many of the small communities from implementation of Alternative B or E simply cannot be overstated given the massive levels of closures to a travel system that provides important access for all recreational users. With closures similar to those proposed in these Alternatives, economic contributions from all forms of recreational activity would be impacted and this should be avoided and must not be overlooked.

4. The Organizations believe that continued multiple-use access and motorized recreation within National Forests and the PSINF 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 as populations rise, our younger citizens are becoming less connected to our public lands and national forests and are less likely to identify with the

³ https://www.bea.gov/system/files/2019-09/orsa0919_1.pdf

⁴ https://www.bea.gov/system/files/2019-09/orsa0919_1.pdf

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 multiple-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 PSINF 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.

5. We acknowledge that the PSINF has been challenged to adequately managing multiple-use/motorized recreation and the ever-increasing growth associated with the diverse forms of multiple-use recreation. However, we feel much of this stems from a rising need and demand for multiple-use recreational opportunities on public lands in general and especially near urbanized areas along the Front Range of Colorado. Several of the Ranger Districts within the PSINF 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 PSINF. 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%!⁵ The need and demand for OHV recreational opportunities are growing and will continue to grow, thereby the Organizations would insist that the PSINF should and must consider roads and trails as critical infrastructure for recreation.
6. 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, however 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 PSINF 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

⁵ DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

opportunities to experience and enjoy the PSINF. 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.

7. With few exceptions, the roads and trails within the PSINF 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 and fuels management, continuing forest visits and recreation, emergency egress and wildland firefighting efforts. The Organizations must point out that, per the Soils and Hydrology Report⁶, of the 2.2 million acres of the PSINF’s Decision Area, the estimated 2,953 miles of routes on the PSI comprise less than 1.1% of the PSINF’s total area. This 1.1% includes all routes both “open to” and “not open to the public” and all classes of motor vehicle routes (i.e., Roads and Trails open to motor vehicle use). The Final Environmental Analysis and statements of impacts all need to consider the extremely small scale of influence and impacts that any single route or even the total of all routes really imparts upon the PSINF area as a whole (i.e. each and every route on the PSINF when summed and totaled together only comprises 1.1% of the total Forest area). It must also be noted that Soil, Erosion and any associated Watershed Impacts can all be mitigated and reduced through proper road and trail design, appropriate route construction, effective sediment and erosion control practices and programmed routine maintenance.
8. We encourage the PSINF to consider including and adopting quality “non-system” routes to help meet the PSINF’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 or deliberately deleted from the Motorized Vehicle Use Map (MVUM) development process (e.g., NFSR 322A).
9. **Colorado Roadless Rule.** The Organizations have concerns that the Roadless Rule is often used as a lever for the expansion of Wilderness areas. This is a misapplication of the Roadless Rule, as Colorado has developed its own rule that specifically identifies motorized trails as a characteristic of a Colorado Roadless area; 1) While Roadless areas have limitations on road construction and heavy maintenance, multiple-use trails are entirely outside the scope of the

⁶ Pike and San Isabel National Forest Public Motor Vehicle Use Environmental Impact Statement, Soils and Hydrology Report, October 2018, pg. 8

Colorado Roadless Rule, 2) Trail networks to include motorized trails may be constructed and expanded in Colorado Roadless areas.

The Organizations are simply too aware from numerous other planning efforts that misapplications of the Roadless Rule are often vigorously pursued by those opposed to motorized recreation and access. Rather than interpreting a Roadless area as an area that provides low intensity dispersed recreational opportunities, those opposed to motorized usage push for these areas to be managed as “Wilderness like” areas. This could not be further from the determinations that were made as part of the final version of the Colorado Roadless Rule.

Rather than motorized usage being a prohibited or restricted use in a Roadless Area, motorized usage of all levels of Colorado Roadless areas is specifically identified as a characteristic of these areas as the final rule specifically states:

Roadless Area Characteristics:

Resources or features that are often present in and characterize Colorado Roadless Areas, including:

(5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation....⁷

Too often the Colorado Roadless Rule is asserted to be a barrier to road construction, road maintenance and trail construction. Road Construction is specifically allowed when:

(2) If proposed road construction/reconstruction meets one of the exceptions, subject to the legal rights identified in § 294.43(c)(1), the responsible official must determine:

(i) Motorized access, without road construction is not feasible;⁸

The Colorado Roadless Rule also allows unfettered road maintenance in a Roadless area, specifically stating as follows:

(5) *Road maintenance.* Maintenance of roads is permissible in Colorado Roadless Areas.⁹

The Colorado Roadless Rule further provides exceptional clarity around the possibility of motorized trails, both existing and new, in the regulation provisions addressing other uses in a Colorado Roadless Area as follows:

“(e) *Trails.* Nothing in this subpart shall affect the current or future management of motorized and non-motorized trails in Colorado Roadless Areas. Decisions concerning

⁷ See, Colorado Roadless Rule @294.41

⁸ See, Colorado Roadless Rule §294.43(c)(2)

⁹ See, Colorado Roadless Rule §294.43(c) (5).

the management or status of motorized and non-motorized trails within Colorado Roadless Areas under this subpart shall be made during the applicable forest travel management processes.”¹⁰

As the Decision rational specifically addresses motorized trail development in the analysis provided for the final Rule as follows:

The final rule does not prohibit use of existing authorized motorized trails nor does it prohibit the future development of motorized trails in Colorado Roadless Areas (see 36 CFR 294.46(f)). The final rule allows continued motorized trail use of Colorado Roadless Areas if determined appropriate through local travel management planning¹¹

The clarity of the discussion provided in the decision rational addresses both Colorado Roadless Areas and Upper Tier Roadless areas as follows:

Upper tier allows for the use of motorized and mechanized equipment, while official wilderness does not. Upper tier allows for motorized recreation, including future development of off-highway vehicle trails; official wilderness prohibits motorized recreation.¹²

Given that motorized usage is a characteristic of a Colorado Roadless Area and trail development is specifically outside the scope of management under a Roadless designation, the Organizations would be vigorously opposed to any closures or restrictions on trails or road maintenance in a Colorado Roadless Area based on an erroneous application of this regulation.

10. The Organizations provide the following **general comments** which 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 resources, protecting the environment and minimizing impacts:
 - a. We feel it is important to spotlight the following principles regarding multiple-use recreation and are important considerations when evaluating any modifications to the existing routes and networks¹³:
 - i. Generally forest visitors participating in multiple-use activities will use routes that exist and adequately satisfy their needs and desires.

¹⁰ See, Colorado Roadless Rule §294.46

¹¹ 39580 Federal Register / Vol. 77, No. 128 / Tuesday, July 3, 2012 / Rules and Regulations

¹² Federal Register /Vol. 77, No. 128 /Tuesday, July 3, 2012 /Rules and Regulations **39589**

¹³ Management Guidelines for OHV Recreation, National Off-Highway Vehicle Conservation Council, 2006

- 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.
 - iii. Route networks and multiple-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 (*e.g., Wildcat Canyon area*).
 - iv. Recreational enthusiasts look for variety in their various pursuits. For multiple-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, scenic 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 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, scenic overlooks, private property, 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 PSINF 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 a claim from those unfamiliar with multiple-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 (*e.g., challenge*) 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 subjective at best. Very few will be able to enjoy the PSINF and all of the resources the PSINF has to offer if an adequate transportation network does not exist or if adequate motorized access is not provided. Multiple-use and motorized recreation is indeed a bona fide form of forest 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 also 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 either the PSINF or the public. The demand for more and more closures of multiple-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 criteria for any decisions regarding the elimination or closure of any multiple-use or motorized route.
- f. In the past there have been unfounded concerns for American elk and mule deer as a 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 PSINF and does not support a premise for closures and reductions in multiple-use

recreational opportunities.¹⁴ Additional research published by Mark Rumble, Lahkdar Benkobi and Scott Gamo in 2005 has also found that hunting invokes a more significant response reason to close and limit multiple-use and motorized recreation on public lands.¹⁵ Likewise research by Connor, White and Freddy in 2001 has even demonstrated that elk population increases on private land in response to hunting activities.¹⁶ 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 generally disagree with the conversion of routes to “Administrative Use Only” or “Maintenance Level 1”. We recognize the primary need for this designation is for uses such as fire access or possible future use. However, if a route is important for USFS and agency staff to access a location, it is very probable and likely that that same route is equally important or desirable for the public for access to 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 multiple-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 a solution for this comes by providing an adequate system of routes that meets the needs of the multiple-use/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 simply 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

¹⁴ Wildlife Response to Motorized Winter Recreation in Yellowstone, 2005 Annual Report, White, Davis & Borkowski

¹⁵ Rumble, Mark A; Benkobi, Lahkdar; Gamo, Scott R; 2005. Elk Responses to Humans in a Densely Roaded Area; Intermountain Journal of Sciences

¹⁶ 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

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.¹⁷

- i. **Sound.** The Organizations take exception with Section 3.8 of the DEIS titled “Noise” and the section titled “Noise” on pg. 16 of the Transportation Report. Published sources define the term “noise” as: “...unwanted sound judged to be unpleasant, loud or disruptive to hearing. From a physics standpoint, **noise** is indistinguishable from sound, as both are vibrations through a medium, such as air or water. The difference arises when the brain receives and perceives a sound.” We would offer that a more appropriate term would and should be “sound”. The term “noise” in and by itself is prejudicial, subjective and an individual perception. **Section 3.8 should be re-titled as “Sound” and the word “noise” changed to “sound” in other appropriate sections of the DEIS (e.g. pg. 1-19).** Motorized and non-motorized uses are equally legitimate uses of public lands and especially on USFS roads and multiple-use/motorized trails. Sound from motorized use is to be expected in areas open to motorized use. The Organizations must assert 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 an 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 historic 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 PSINF would be impulsive, unjustified, reckless and impossible to enforce. The shear growth of our population, uncertainty about incomes and spending,

¹⁷The 2014 Off-Highway Vehicle Law Enforcement & Field Presence Program, Colorado Parks and Wildlife Division, March 2014

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 emissions and carbon footprint.

- k. **Financial Sustainability.** The Organizations would encourage and support the PSINF's decision to convert most any existing National Forest System Road (NFSR) to a "trail open to all vehicles" or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width). Conversion of roads to multiple-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 PSINF 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/PSINF 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 PSINF or any National Forest.

Since the commencement of the lawsuit and subsequent settlement efforts, there can be no argument that the motorized community and the voluntary registration program administered in partnership with the Colorado Parks and Wildlife OHV program has provided millions of dollars in direct funding for maintenance crews on the South Platte RD, Pikes Peak RD, Salida RD/Upper Arkansas, San Carlos RD and a maintenance crew for the Rampart Range Motorized Management Committee operating throughout the PSINF. In addition to the maintenance crews that have been consistently provided, the motorized community additionally provides significant funding for project specific efforts such as the Captain Jacks reroute efforts, camping in the Badger Flats area and trail maintenance efforts on the South Park RD. This partnership provides almost \$1 million per year for basic operations on the PSINF that benefits all recreational users.

Over the course of the litigation and subsequent settlement, simply keeping this funding flowing to the PSINF has proven difficult due to delays in project timelines, challenges due to changing conditions at project sites, altering scopes of work and resolving questions of the status of particular projects in relation to the Forest level efforts. The motorized community has worked very diligently and hard to ensure that the partnership between the CPW program and PSINF continued to flow as our community saw the value in the efforts and benefits to all recreational usage and that resource protection continued on the PSINF.

- I. While the motorized community has worked with PSINF managers to benefit all users, the Organizations would note that this type of partnership has not been pursued by many of the parties to the litigation. Rather than engage with the USFS to resolve issues in a collaborative manner many of these parties have simply continued to sue (or threaten to sue) the USFS on a wide range of issues. This contradictory approach could not be exemplified better than by the situation around the Bear Creek Watershed/Captain Jacks trail network on the Pikes Peak RD. Separate litigation was commenced by many of the parties to the original PSINF litigation on this trail network, which was settled and the trail network was moved in a successful collaboration with a wide range of interests. The Organizations were disappointed that despite the success of the Captain Jacks/Bear Creek project, a lawsuit challenging this project was threatened once again years after completion of the NEPA and implementation of the Decision on Bear Creek.

We believe that this situation provides a material, tangible and probable conclusion for the possibility of litigation on any resolution that might be reached on the current PSINF Forest level efforts. Parties that have not supported mitigation efforts over the decade that has passed since commencement of the PSINF litigation regardless of whatever

resolution is reached will simply once again sue the USFS. What does this mean? The motorized community submits that the USFS simply has to make the best Decision for the PSINF that meets the purpose and need of the project, has a solid scientific basis and not allow thoughts of some type of compromise will resolve the concerns of those opposed to these efforts. This type of collaboration towards a common ground type of Decision that could avoid litigation simply is not possible. The Organizations submit a modified version of Alternative C is just such a science based resolution of concerns that meets the purpose and need and reflects the fact that the PSINF has effectively addressed travel management related usages on the forest for decades.

- m. The project Specialist Reports such as the Transportation, Soils and Recreation Reports need to be revised and updated to reflect **Alternative C as the Proposed Action/Alternative**. Currently the reports incorrectly identify Alternative B as the “proposed action”.

Detailed and Specific Comments

1. The Organizations support the PSINF’s decision to convert most any existing National Forest System Road (NFSR) to a “trail open to all vehicles” or another trail designation (e.g., trail open to motorcycles, or open to vehicles 50” or less in width). We encourage the PSINF to utilize the specific 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. The Organizations will assume that the conversion of roads to trails may invoke a requirement that vehicles using a converted road, now a “trail”, may be required to possess and display a current Colorado Parks and Wildlife OHV registration or permit sticker.
2. Alternative C, as released for public review and comment in the DEIS, has a number of roads that are being considered/planned to be converted to trails, which the Organizations enthusiastically support. However, this alternative also includes 330 additional miles of road segments that should also be converted to trails. Using the Minimum Road System (MRS) Screening Criteria as described in Section 2.3.1 of the DEIS, and using the individual and overall ratings from the PSI Travel Analysis Reports (TARs), the Organizations have identified an additional 239 individual road segments as ideal candidates for converting to trails. According to the DEIS, the PSI staff reviewed these segments and decided to deviate from their own screening process (Section 2.3.1, page 2-6). The document states that these changes “remain consistent with the aim and emphasis of the alternative”, but they (i.e. PSI staff) have not provided a revised Travel Analysis Process (TAP) or any other documentation to support their claims; so it appears to the Organizations that they have essentially ignored and contradicted the TAP results when they are required by USFS policy to use a science-based travel analysis

process to inform their decisions. The PSI staff must make their decisions based on a science-based process rather than on their own subjective preferences and biases, so the Organizations must insist that this issue be addressed and fixed and that the majority of the 239 segments be included for conversion to trails. The Organizations believe that the conversion of these roads to trails will result in an improved and safer minimum road system, and will better meet the stated purpose and need for this project. The following table identifies, by Ranger District, the number of the 239 individual road segments that should be converted to trails when preparing the Preferred Alternative in the FEIS.

Table 2

Ranger District	Number of Road Segments to be “Reconsidered” for Conversion to Trails
Leadville	17
Pikes Peak	19
Salida	37
San Carlos	51
South Park	100
South Platte	15

3. The Organizations enthusiastically support the adding of new **“Open Areas”** (as proposed in Alternative D) as areas open to motor vehicles to Alternative C. The Organizations specifically and strongly support adding Open Areas in the Rainbow Falls area as previously proposed in the South Rampart Travel Management Plan (SRTMP), any and all areas useable by trials motorcycles for trials training and riding, and any areas designated for new rider and or operator training and practice (e.g. Kids riding areas, skills development, challenge areas, etc.) such as adjacent to the Rule Ridge Trailhead on NFSR 357. Per the Recreation Report, the Organizations support the following proposed Areas Open to Motor Vehicles being added to the Preferred Alternative:

Table 3

Ranger District	Proposed Areas Open to Motor Vehicles
South Park	PA 4, PA 29
San Carlos	PA 9, PA 15
Pikes Peak	PA 32, PA 33

4. The Organizations unequivocally support the “leave as is” (i.e., open to public access) recommended action in Alternative C for the entire length of **NFSR 346** (aka Hotel Gulch, Pikes Peak RD). NFSR 346 is the **only east-west connection** between State Highway (SH) 67 and NFSR 300 (aka Rampart Range Road) between Woodland Park and Rainbow Falls. NFSR 346 provides a critical recreational access for multiple-use travel between the Front Range and recreational opportunities to the west. It provides a critical route for Dual Sport motorcycles and others utilizing NFSR 320 (aka Mount Herman Road) and NFSR 300 to connect with the North Divide, Rainbow Falls, North Rampart, South Rampart, South Park, and other recreational areas. NFSR 346 also provides beneficial connectivity for hunters and mountain bikes. Although Recreational Use is “moderate” (as designated by the 2014 TAP) this road provides the only east-west link within the 10-mile corridor of SH 67 and NFSR 300. The roadside vegetation along NFSR 346 is extremely lush for the entire length, the number of stream crossings is nil. The soils in this watershed are typical of the entire Rampart Range. The slope aspects along with the soils have resulted in very established vegetation with natural erosion control measures, the road tread is offset from any ephemeral channels, the road surface shows minimal signs of erosion and rutting. The Organizations support adding PA 18 to connect NFSRs 346 and 300.F as a road open to all vehicles to help disperse use and reduce use on the upper/eastern portion of NFSR 346.

5. The Organizations would contend that **NFSR 322.A** in the Pikes Peak RD should have been included and designated on the original MVUM and that the requirements of 36 CFR, Part 212 have not been followed, keeping this road closed to public access. We feel that NFSR 322.A was closed improperly and needs to be re-opened immediately and placed onto the Pike Peak RD MVUM. This route provides an important connection between NFSR 320 (aka Mount Herman Rd.) and NFSR 322, which synergistically provides high quality recreational loop opportunities. NFSR 322.A could also be a candidate for conversion to a “trail open to all vehicles” or “trail open to motorcycles” to discourage causal use and access by low clearance vehicles. We realize NFSR 322.A was closed for alleged resource damage, but mitigation efforts have been successful in this area and the route should be re-opened to public access. NFSR 322.A provides a sought after opportunity to connect with and to enhance combined loop 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 mile) and NFSR 933 to NFSR 323 (<1 mile) to provide enhanced looped opportunities.

6. The Organizations are obliged to point out that **NFSR 302.A** (Pikes Peak RD) is being shown on Alternative C and other alternatives as being “Decommissioned”; that this route has been in fact already been decommissioned and was closed improperly and with “pre-decisional” prejudice prior to this project. The Organizations contend that NFSR 302 should have been left open to public access and a connection made to NFSR 302 to provide enhanced public access and a looped opportunity in a popular recreational area.
7. **NFSTs 667, 720, 701** (Pikes Peak RD) and others are incorrectly shown on the maps as published in the DEIS. These trails and the current, existing trail alignments needs to match the “Decision” recently made for the Bear Creek Watershed. There are also issues with other newer trails being omitted or incorrectly depicted on the maps included with the DEIS such as NFSTs 679.B and multiple/numerous segments of the NFST 770 trail system (e.g., 770.A, 770.B, 770.C, 770.D, 770.E, 770.F, 770.G, 770.H, 770.I, etc.) in the South Platte RD. We understand that some of these trails are newer trails/routes and may not have been part of the INFRA data set when this project began and as this project has progressed through the Analysis Phase. However, the Organizations have concerns that these trails and routes, previously incorporated by past “Decisions”, do not become candidates or “unfortunate casualties” for closures in the future because these particular trails and routes were not somehow properly included in this “Decision”. This is a very similar situation to our concerns, issues and comments relating to **NFSR 322.A** (Pikes Peak RD) and how this specific route was omitted (either purposely or inadvertently) from publication on the Pikes Peak RD MVUM {circa 2016} and is now a candidate for closure and loss of public access.
8. The Organizations stalwartly support keeping **NFSTs 717, 717.A, 717.B, 717.C, 717.D, 717.E and 717.F** (Pikes Peak RD) “as is” with no closures or restrictions. Trails 717, 717.A, 717.B, 717.C, 717.D, 717.E and 717.F are all interrelated and provide a unique recreational, multiple-use trail system unmatched anywhere else in the Pikes Peak RD and PSINF. 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 RD and PSINF. 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 multiple-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, Lake George and Florissant. Curtailment of any of these trails or any reduction of the multiple-use activities in this area would likely have significant economic consequences to these communities. These communities rely and depend upon the surrounding Pikes Peak RD/PSINF and all of the related recreational opportunities the Forest 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.

9. 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 “trails open to all vehicles”** (*specifically we request that NFSRs 221, 220.A, 220.B and NFSR 540 be re-opened and converted to trails open to all vehicles along with the approximate 1 mile segment of NFSR 205 in Douglas County be converted to a trails open to all vehicles*). 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 (i.e., Teller County), 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 trails open to all vehicles) 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.

10. The Organizations support the connection of **NFSR's 340.B to NFSR 343.B** (Pikes Peak RD) along with a new trail connection from the end of NFSR 340.B (at the intersection of 340.B and Teller County Road 78) to NFSR 357. These very minor and small connections will 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 will also provide redundant access to the weather station. We would support conversion of all of these routes to "trail open to all vehicles".
11. The importance and unique multi-use recreational qualities of the South Platte Ranger District's 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 multiple-use recreational needs and demands of the Denver Metro area. We support the South Platte Ranger District's efforts, past and present, *(and those of the Rampart Range Motorcycle Management Committee)* to improve and maintain this trail system. The Ranger District's history of diligently working to improve the sustainability of this area's network of routes and trails has been commendable.
12. **Continental Divide Trail Management.** The Organizations are aware of numerous discussions around the management of the Continental Divide Scenic Trail ("CDNST") footprint and lands adjacent to the trail that are occurring on the Rio Grande NF, GMUG NF, and three forests in New Mexico. Additionally, we are aware of five travel plans where similar concepts are being advanced in winter travel planning in California. While the PSI DEIS has stated that such a concept is not moving forward in the planning process, the Organizations believe it is important to note our opposition to the management of the CDNST footprint and adjacent lands in a single manner or any decision that the trail is only open to "Horse and hike".

Single standard management is a direct violation of the National Trail System Act ("NTSA") requirement that any national trail be managed in a manner consistent with adjacent forest planning guidance. Moreover, the NTSA clearly identifies that management decisions are to be made on a segment-by-segment basis rather than at the landscape. Segment based management is an important standard for the CDNST as both the NTSA and CDNST plan both specifically allow motorized usage on the CDNST. Clearly, concepts such as management by segments are necessary for the management of any long distance route as it will cross Congressionally designated Wilderness as well as enter medium sized communities. The Organizations also note that such a single-minded concept also conflicts with the existing PSINF resource management plan. The Organizations believe the multiple use nature of the CDNST is one of the great strengths of the trail and are opposed to any efforts to alter such a decision.

13. Regarding the stipulations for the consideration of **Seasonal Closures** we provide the following comments:

- a. Recommend that the selection of a specific date(s) to implement any required closure period utilize the following criteria:
 - i. Minimization of the closure period to maximize availability of the routes and areas for recreational uses.
 - ii. Generally consistent and uniform closure dates to minimize confusion within the individual Ranger Districts and throughout the PSINF. Multiple dates will likely be more difficult to communicate to Forest visitors and more challenging to enforce. However, each seasonal closure must be individually analyzed.
 - 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 PSINF should avoid implementing seasonal closures that create confusion and create an unnecessary enforcement and financial burden.
 - iv. Seasonal closures that affect only motorized users (e.g. the proposed seasonal closure of NFSR 300, aka Rampart Range Road, Pikes Peak RD), are inconsistent with the best available science for protecting habitat¹⁸ and **seasonal closures must be made universal to all users, both motorized and non-motorized.**
- b. The Organizations provide the following specific comments and modifications to current or proposed Seasonal Closures in the DEIS:
 - i. Remove and eliminate the existing and proposed Seasonal Closure on Rampart Range Road, aka **NFSR 300** (Pikes Peak RD). There is no reasonable justification to close this road seasonally, no critical habitat to protect, wildlife issues, road surface issues, etc. Previously stated justification by the Pikes Peak RD to close this road seasonally can be accomplished through visitor education and enforcement.
 - ii. Remove the existing and proposed seasonal closure of **NFSR 376.A** (Pikes Peak RD)

¹⁸ Sime, Carolyn A; 1999. Domestic Dogs in Wildlife Habitats, Effects of Recreation on Rocky Mountain Wildlife,

- iii. Remove the Seasonal Closure on **NFSR 185.D** (Salida RD) as the closure eliminates access to NFSRs 185.DA and 185.DB and curtails access to NFSR 1434.
- iv. Remove the proposed permanent seasonal closures of **NFSR 101, 108 and NFST 1336** (Salida RD).
- v. Remove the proposed seasonal closure of **NFSR 212** (Salida RD), which inhibits access to NFST 1411, which has no seasonal closures.
- vi. Remove the existing and proposed seasonal closures of **NFSRs 101 and 105** (Slaughterhouse Gulch) (South Platte RD).
- vii. Remove the existing and proposed seasonal closures of **NFSRs 212** (China Wall) and **212.A** (South Park RD).
- viii. The DEIS does not provide adequate or necessary information on proposed dates for Seasonal Closures which hampers the public's ability to prepare and provide substantive and meaningful comments. *[On October 29, 2019 an email was sent out by the USFS with a link to a spreadsheet that listed proposed "seasonal closure dates". This email was sent out just days prior to the deadline for DEIS comment submission. The spreadsheet contained 3,838 individual lines of information that the public was expected to review and provide comments on. This is an unreasonable and excessive request of the public on behalf of the USFS and PSI Project Team. The Organizations must also question the logic used to determine the proposed seasonal closure dates as some dates are listed as beginning on the 1st of the month and others (e.g., in the South Park RD) on the 2nd of the month. This will be confusing and aggravating to the public (see 13.a.ii. above). The Organizations did not have adequate time to review this seasonal closure spreadsheet or prepare our comments prior to submitting this document].*

14. The Organizations must contend that Alternative C be modified to keep Williams Pass, **NFSR 298.A** (Salida RD) intact and usable for motorized recreationists, specifically full-size vehicles. Currently, under Alternative C, the Salida RD side of the pass would be converted to a non-motorized trail. This would be highly detrimental to the motorized community and contravene the energy and efforts put into the Williams Pass road/area over the past several years. It would also be extremely difficult to manage the action of 'convert to non-motorized trail' as listed in Alternative C, as this would only impact the east side of Williams Pass. It is important to note that the west side of Williams Pass is in the Gunnison RD, which is not part of the Pike & San Isabel National Forest, Public Motor Vehicle Use Project. Additionally Williams Pass, NFSR 298.A, is part of the Chalk Creek Canyon/Alpine Tunnel recreation area and is enjoyed by all

forms of motorized enthusiasts. The area's abundant mining roads and trails allow users to create large loops by combining several routes and trails together. This is highly desirable for the motorized user and allows forest visitors to experience several enjoyable areas together. The Organizations support comments submitted separately and independently by **Colorado Off Road Enterprise (CORE)** regarding NFSR 298.A (Williams Pass).

15. The Organizations support and endorse comments submitted separately and independently by **CORE**, especially those comments addressing the need to correct mapping issues in the Salida and Leadville RDs with **NFSRs 110 and 110.J** (Halfmoon), **NFSR 277** (Baldwin Lake) and **NFSRs 398** (Lost Canyon), **398.B** (Lennie's Overlook) and 399 (Flume Gulch). The Organizations also support CORE's comments to keep **NFSR 603** (Peerless Mountain) in the South Park RD open to public access and eliminate the recommended conversion in Alternative C to "special use permit only".
16. The Organizations support and endorse comments submitted separately and independently by **CORE**, specifically those comments addressing the need to correct mapping issues in the Salida RD with **NFSR 349** Grassy Gulch. Eliminate the improper proposed decommissioning of the upper section of this road as identified by **CORE**. The Organizations also support and endorse CORE's comments regarding **NFSR 145** (Slide Lake) and **NFSR 381** (Cloyes Lake) (Leadville RD).
17. The Organizations support and endorse comments submitted separately and independently by **CORE** regarding keeping **NFSRs 174, 174.A** (Willow Stump, Leadville RD) open and available for public use, keeping the NFSR 135 & 135.A (Storke Portal & Mt. Arkansas, Leadville RD) network open and available for public access, keeping the routes and roads in the roads in the **Mosquito Pass/West Alma Trail System** (e.g., NFSR 449, 285, 192, 856, 452, 450, 451 in the South Park RD) open and available for public use and finally considering conversion of **NFST 1437** (Pomeroy Lakes) as a Trail Open to all Vehicles in order to extend **NFSR 297** (Pomeroy Lake road) to Upper Pomeroy Lake.
18. For reference and to ensure continuity of the Organization's previously stated and submitted statements of needs, purpose and justification for individual routes, the Scoping Phase Comments previously prepared and submitted by the Organizations are provided in Appendix A of this document. These comments continue to be and remain relevant to the analysis of individual routes to provide Forest access and in many cases recreational opportunities of each individual route. **The Organization's comments provided in Appendix A shall continue to be utilized during the final analysis phase for each individual route.**

In conclusion, the Organizations are pleased to offer our collective assistance and expertise to this extremely important project. We firmly believe that multiple-use access and motorized recreation within the Pike & San Isabel National Forests 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 multiple-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 multiple-use and motorized recreation will only escalate and that it will be imperative that the Pike & San Isabel National Forests work diligently to serve the public by professionally managing and providing the necessary recreational opportunities that support multiple-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, P.E. at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259, williamalspach@gmail.com.

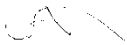
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