

## **Comment on Envision Chaffee Draft Recreation Plan**

Marcus Trusty  
CORE  
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My name is Marcus Trusty. I am the founder/president of Colorado Offroad Enterprise (CORE), based in Buena Vista, CO. CORE is a motorized action group dedicated to keeping all motorized roads and trails open in Central Colorado. CORE currently helps maintain 15 adopted trails in the Central Colorado Region. During 2019, we completed nearly 2,000 volunteer hours through our organization.

I am a third-generation Chaffee County Native and own a local business that has been in operation for 15 years. I have spent a considerable amount of time on public land in Chaffee County, participating in all types of recreation.

### **I. Summary**

Land and user management is an increasingly difficult task. Land Management Agencies have several federally mandated regulations and processes to follow before making public land decisions. The Management Agencies also have obligations to solicit public input at several points before making a project final decision. Public lands belong to everyone, and individuals, groups, and municipalities frequently comment on issues about their concerns and interests.

The Envision project was initially marketed as encompassing three areas, Wildfire Prevention, Working Lands and Water Quality, and Recreation. The first two areas seem highly specific to Chaffee County and its residents. A wildfire in Chaffee County could destroy the local economy for several years and residents' personal property. The rural atmosphere of Chaffee County is highly desirable, and for many, it was a big part of the appeal in moving to the county. CORE does not have significant issues or specific concerns with the Wildfire or Working Lands initiatives developed from the Envision Process. However, the Recreation in Balance Draft Rec Plan and the process used to create this plan is troubling. CORE is concerned that Envision is trying to sidestep and influence the federally mandated NEPA process required for travel management and recreation on public lands. Initially, Envision's goals seemed to look at recreation from a global level county-wide. However, the Draft Rec Plan reveals Envision's aspirations for travel management and recreation restriction on public lands.

It seems Wildfire and Working Lands initiatives have more merit for residents of Chaffee County, and it is reasonable to involve residents in the development of these policies. Envision, however, should NOT be steering public land decision-making outside of the regular afforded public process. Public Lands belong to everyone, and as such, The Land Management Agencies have

Federal Law dictating how they manage projects and the subsequent decision-making process. Envision is highly focused on dispersed camping in Chaffee County. It seems Envision could be helpful in the dispersed camping concerns in Chaffee County if the process recognized the short-term living that is taking place within the County. Without acknowledging short-term living disguised as camping, any solutions coming from the Envision project will not have a positive outcome.

Additionally, Envision's scope for recreation is limited to the county boundaries. This is problematic because the public does not recreate on arbitrary county boundaries. Regional recreation is a much more accurate way of analyzing existing recreation and would be a better method.

Envision consistently names numerous individuals and groups to appeal to their authority and convince those not familiar with the process of its value. However, at the same time, Envision is short on producing specific information it cites throughout the process. CORE is concerned with the accuracy of statements made in the Rec Plan, which do not contain supporting documentation and does not cite a source. CORE is also concerned with the Recreation Zone Boundaries, Survey Results, Seasonal Closures, and Motorized Use assumptions.

Please accept the following specific comments for Envisions' Draft Recreation Plan.

## **II. Dispersed Camping**

CORE is concerned that Envision suggests the outcome of the current BLM Camping Project and the future Forest Service Camping Project. The BLM Camping Project appears to be pre-decisional and Envision is already planning for the known outcome. Public Land belongs to all users, not just Chaffee Residents or those driving Envision. In several other areas the Rec Plan appears to try and steer these yet-to-be-determined objective processes used by land managers. This pressure could cause an issue with the objectivity and validity of each project. Envision should be a participant in the land management process, just as all groups and individuals participate in public land decision-making processes. Envision in no way should be driving how all people can recreate on public lands.

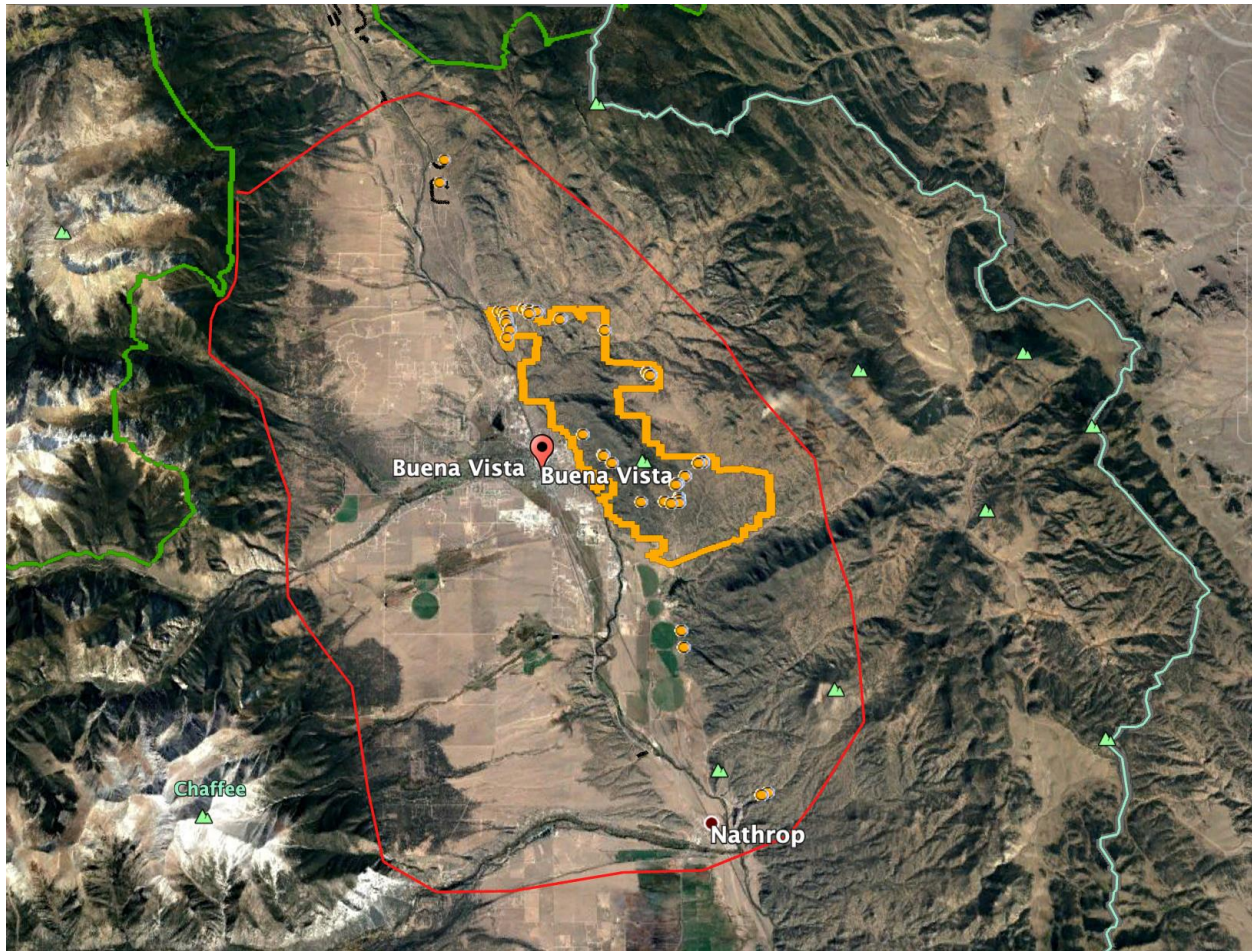
## **III. Recreation Concentration Zones**

CORE has concerns with the recreation concentration zones identified in the Draft Plan. The recreation concentration zones are inaccurate and much too small. They do not reflect the current recreational usage and the current residential/recreation opportunities. Motorized recreation is also much too broad and needs substantially more mileage than available in these zones.

A consistently overlooked detail by Envision is the short-term living, which is taking place on public land near the county municipalities. These are not weekend recreators but are summer

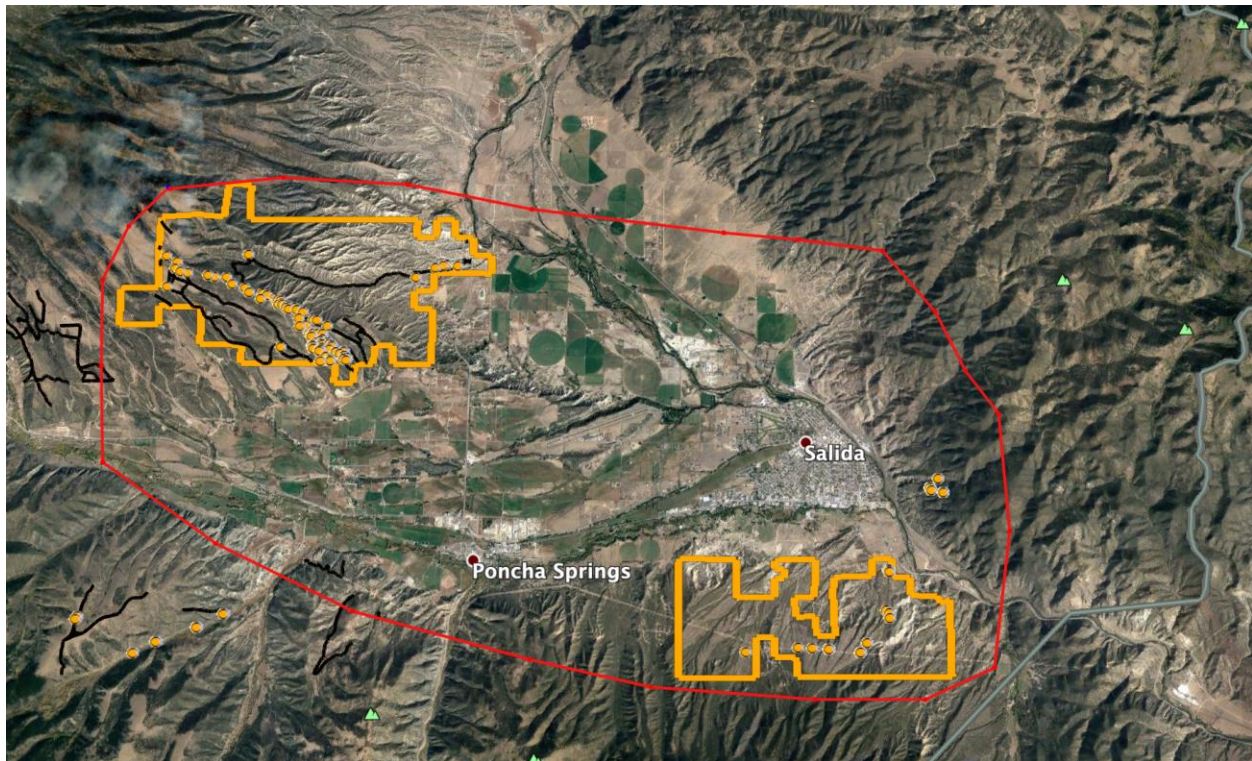
residents, and they require analysis as such. We do not condone short-term living on public lands, but the results of these summer residents are similar to people coming to Chaffee County to use their second home for recreation. Short-term living and housing developments outside of municipal boundaries have not been accurately accounted for, and thus the recreation zones are much too small. Many people living outside of municipalities frequently recreate year-round from their homes in the form of cross-country skiing, biking, snowshoeing, snowmobiling, fat biking, hiking, and offroad driving. These activities are dynamic to the environment and may change yearly, but the act of engaging in recreation is constant. Additionally, development in these areas is growing.

The Buena Vista Recreation Zone should include all development communities on the west side of the valley, including Trail West, Game Trail, Three Elk, and Four Elk. Residents from the valley and visitors frequently access adjoining public lands from these developments year-round. The east side of the Recreation Zone should include all of Sleeping Indian and the surrounding Trail networks on the north side and the south side within Fourmile. Many residents use these areas year-round because of the proximity to Buena Vista and the four-season access to quality trails and multiple recreation opportunities. More residents live outside the City Limits of Buena Vista than inside the City Limits. Nearly all these people recreate year-round in an area larger than the area shown in the draft plan. The following satellite image depicts the actual recreation zone around Buena Vista, shown as the red boundary. This imagery includes the campsite zones defined in the BLM Dispersed Camping Project, County Boundaries (light green), and Wilderness Boundaries (Dark Green).



The Salida/Poncha Springs Recreation Zone is also much too small to reflect the residential population and the recreation within those residential areas, which border public land. Envision should also include the Shavano Camping Area from the BLM Camping Project due to the proximity of Salida and Poncha Springs. Short-term living is taking place in many of these areas, and although not lawful, it adds residents in the same aspect as established homes. The extensive developments along Hwy 291 and the Hwy24/285 Corridor house numerous residents in a similar fashion to developments outside of Buena Vista. These areas require inclusion when considering the Recreation Zones. The Envision process has consistently overlooked the housing issue in Chaffee County, which could be one of the main factors in dispersed camping. See the following satellite image depicting the actual recreation zone shown in Red. Also shown for reference are the BLM Camping Project Areas.





Also, much of these larger suggested zones include orange, purple and red wildlife areas developed by Envision. These include 'disturbed high quality' and 'undisturbed high quality' wildlife habitat, which can mean only one of three things. The information used by Envision was not accurate, the survey data is not correct, or recreation and wildlife can co-inhabit the same areas.

#### **IV. Recreation Survey**

CORE is concerned that the Envision survey data is weighted far too heavily and is a primary factor driving the Draft Rec Plan. Envision chose to use a survey to collect and analyze information to form the Rec Plan. The Rec Plan refers to the survey responses on numerous occasions to justify the Rec Plan Recommendations and proposed actions. Envision's survey was fully completed by 2,543 participants, with 36% of those responses from Chaffee County Residents, 915 people. With a county population of 18,507, that means residents represented only 5% of the respondents. The other 1,628 responses were from people outside the county, and one can assume these people responded to the survey because they visit the county. Envision's data also claims that Chaffee County saw around Four Million visitors last year. If only 1,628 responses came from Four Million visitors (people outside the county), there is no statistical significance to draw sound conclusions for public land use.

Envision and the Draft Rec Plan repeatedly refer to the communities' desires, but when only 5% of the local population responded to the survey, that claim is questionable. Suppose you had a room with 100 people, and you asked five people a question. Upon those five answers, you then

claimed to represent the other 95 people; nobody using objectivity would allow five people to speak for the complete room.

While the survey was developed by professionals and was done to mitigate bias, there are still issues. Envision decided on the variables of importance and then asked the community questions concerning those variables. The only responses are then, by default, only concerning those topics.

The Land Management Agencies, by contrast, do not solicit comments and feedback during the public process through survey questions. They instead rely on written comments submitted by the public. Comments are grouped into three types of classifications. These classifications are substantial, unsubstantial, and form letters. Substantial comments are original and contain specific comments relative to the project and, in many cases, include specific recommendations to be used by The Agency during the process. Unsubstantial comments are a comment directed at a general statement or staff, contain no detailed or credible information to be used during the process. Form letters are a copy of the same comments submitted by several individuals. Form letters get recorded as a single comment. If a commenter addresses a specific topic, it is from their direction. If an Agency were to get hundreds of substantial comments concerning the same subject, The Agency could know the issue is essential to the recreating public. The Agency method contrasts with the Envision Survey, which asked questions about set topics. Furthermore, many of the cited responses in the survey report were comments a Public Land Agency would classify as unsubstantial. These are a few examples:

*"The constant demand for new trails is reducing habitat available to wildlife."*

*"high mountain streams and lakes are soiled by campsites and social trails on the banks."*

*"Far fewer sightings of large game (elk, bear, etc.) than 10 years ago".*

*"We see less wildlife (turkeys) and birds."*

Where is the substance in these survey comments? What specific habitat is reduced, and where is it happening? What lakes and streams are soiled, and which social trails are a problem? Anecdotal game sighting comparisons over the years by an individual are not scientific. It's not merely wildlife-specific comments that are unsubstantial in the survey responses. Here are motorized comments:

*"Create more OHV specific trails to avoid user conflict."*

*"Open more ohv routes that connect roads and trails to spread users out."*

*"Separate walking and wheeled vehicle trails."*

These comments also lack substance and specificity. Where is there user conflict, what is happening, and how would OHV specific trails remedy this? Which routes need to connect to

roads and trails? How would this help to spread users out? What areas and trails in Chaffee County would benefit from separating users with designated routes to the same location?

All the above examples do not help land managers make decisions. Alternatives for Agency projects are largely determined during the scoping period and based on substantial public comments. Envision appears to collect un-specific information around various topics to make specific recommendations to land managers concerning those same topics. This tactic is distorting public feedback and inserting Envision's motives into the recommendations.

In several cases, the survey and data exhibit the Social Desirability Bias. This Bias affects data when people recognize the socially appropriate answer and give a perceived response regardless of their honest opinion. The results, section 6 specifically, referring to question 18, 19, and 21 appears to have some red flags associated with this bias. People rated protecting wildlife, small wildlife, maintain quality experience, and maintain multi-use opportunities higher than facilities, more opportunities, and tourism. People felt the 'right' answer was to protect more virtuous things rather than state the 'wrong' response, which seems more selfish. The following survey section also exhibits many similarities. Protecting water, wildlife and forests were the most common answers compared to increasing economic benefits. Which is the more socially acceptable answer? Who doesn't want to protect water, wildlife, and the forest? Is it socially acceptable to think economics supersede the protection of those things? These results must account for the Social Desirability Bias.

## **V. NEPA and Seasonal Closures**

The Agencies are required by Federal Law to engage in a rigorous NEPA process before making decisions. The Draft Rec Plan seems to acknowledge this fact and assumes Envision can steer the process in its desired direction. From page 20 of the Draft Rec Plan referring to the Recreation Planning Tool:

***It does not replace federal land agency processes such as site-specific NEPA but accelerates work by clarifying priorities. It helps direct limited resources to the most important projects, identifying the top 25% so they can be developed quickly.***

Timeliness should not always be the driving factor, especially since Federal Regulations drive land management projects specifically, so all voices have a chance to be heard and weighed equally. The Draft Rec Plan admits that areas and projects were reviewed and adjusted by only six people, several of whom were the driving forces behind the creation of Envision.

***The Rec Infrastructure tool was initially populated with potential projects and prioritized in early 2021 by land management agencies, town and county staff, and Rec Taskforce members who used nine metrics tied to the Rec Plan goals, as shown below. To get ratings as consistent as possible across***

***all lands, they were reviewed and adjusted by a team including CPW Wildlife Biologist Jamin Grigg, Chaffee County Fire Protection District Chief Robert Bertram, Former Summit County Commissioner and water expert Rick Hum, Outfitter and guide Chuck Cichowitz, Chaffee County Economic Development Corporation founder and 5th generation agricultural operator Jeff Post and Envision Co-Lead Cindy Williams.***

How is it viable that only six individuals should drive the direction for future NEPA processes? How can objective recreation planning, NEPA, and subsequent decisions affecting all future recreation be based on the opinions of SIX individuals, several of whom have a conflict of interest by being directly involved with the creation of Envision? Especially since CPW can, and does, comment during Agency Projects, and all others from this 'team' are free and encouraged to comment during all Agency Projects.

Excluding CPW, did any of the people listed comment on the ongoing Pike and San Isabel Travel Management Process and NEPA? Travel Management, while specific to motorized travel, is the direct access to all forms of recreation and most camping opportunities. This rigorous process was conducted over many years, since 2015, and analyzed every road and motorized trail segment within Chaffee County and the entire Pike and San Isabel National Forest.

You can see the National Forest's thorough process in the below graphics depicting the broad spectrum of info considered before making a management decision on each motorized route. The following example is for NFSR 185.D. This road is in Chaffee County, just outside of the Ruby Mountain Camping and Staging Area. It includes a current seasonal closure located in a purple area on the Envision Wildlife Habitat Map.

## Forest Road 185.D: LITTLE COTTONWOOD CREEK

### Route Details

- Beginning Milepost: 0.29 miles
- Ending Milepost: 3.93
- Route Segment Length: 3.64 miles
- Mileage (as calculated in GIS): 3.61 miles
- Current MVUM Status: Roads, open to all vehicles
- Managing Ranger District: SALIDA
- Administrative Ranger District: SALIDA
- County: CO - CHAFFEE COUNTY
- Seasonal Closure Designation: seasonal
- Road Surface: NAT
- Current Maintenance Level: 2 - HIGH CLEARANCE VEHICLES
- Desired Maintenance Level: 2 - HIGH CLEARANCE VEHICLES
- Route Segment Length Evaluated in TAP: 4 miles
- Route Mileposts Evaluated in TAP: 0-4 miles
- TAP Comments: No data
- DEIS Alt C Proposed Seasonal Closure: No data
- Decision Seasonal Closure: No data



## Travel Analysis Process (TAP) Scores

Combined Benefit/Risk Rating: H/L

## Benefits

Category	Score
Recreational Use Benefit	H
Fire/Fuels Access Benefit	H
Timber Access Benefit	L
Special Use Access Benefit	L
Resource Management/Range Access Benefit	H

## Risks

Category	Score
Watershed Risk	M
Wildlife Risk	M
Botany Risk	L
Archaeology Risk	L
Public Health and Safety/Financial Burden Risk	L

## Alternatives Comparison

[illegible]

## Species & Management Area Data (Rocky Mountain Wild)

Sourced from the spreadsheets in the Colorado Mountain Club's comment, which was created using Rocky Mountain Wild's Assessment of Biological Impact screening tool. More information about the tool is available [here](#). This website includes information about NatureServe codes shown for animals and plants.

Species	Class	Area Type	Percent Overlap	Overlap Length (miles)	Source	Date	RMW Species Rank	NatureServe Global Satus	NatureServe Colorado Status	FWS ESA Status	CPW Conservation Status	USFS Sensitive Species
Na (NA)	NA	Colorado Wilderness Act 2011 - Browns Canyon	0%	0	RMWild	8/17/11	NA	NA	NA	Not Listed	NA	NA
Na (NA)	NA	Wild Connections Conservation Plan Proposed Wilderness WCCP 2006 - Browns Canyon Aspen Ridge	3%	0.11	Wild Connections	6/1/06	NA	NA	NA	Not Listed	NA	NA
Rocky Mountain Bighorn Sheep (Ovis canadensis canadensis)	Mammal	Bighorn Migration Corridors CPW 2018	1%	0.04	CPW	11/8/18	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes

Rocky Mountain Bighorn Sheep (Ovis canadensis canadensis)	Mammal	Bighorn Production Area 2013 (COGCC RSO)	24%	0.87	COGCC	6/3/13	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes
Rocky Mountain Bighorn Sheep (Ovis canadensis canadensis)	Mammal	Bighorn Production Area CPW 2018	24%	0.87	CPW	11/8/18	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes
Rocky Mountain Bighorn Sheep (Ovis canadensis canadensis)	Mammal	Bighorn Severe Winter Range CPW 2018	41%	1.48	CPW	11/8/18	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes
Rocky Mountain Bighorn Sheep (Ovis canadensis canadensis)	Mammal	Bighorn Summer Concentration Area CPW 2018	41%	1.48	CPW	11/8/18	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes

Rocky Mountain Bighorn Sheep ( <i>Ovis canadensis canadensis</i> )	Mammal	Bighorn Winter Concentration Area CPW 2018	41%	1.48	CPW	11/8/18	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes
Rocky Mountain Bighorn Sheep ( <i>Ovis canadensis canadensis</i> )	Mammal	Bighorn Winter Range 2013 (COGCC SWH)	89%	3.26	COGCC	6/3/13	B	G4 (Apparently Secure)	S4 (Apparently Secure)	Not Listed	NA	Yes
Elk ( <i>Cervus canadensis</i> )	Mammal	Elk Severe Winter Range CPW 2018	47%	1.7	CPW	11/8/18	C	G5 (Secure)	S5 (Secure)	Not Listed	NA	No
Mule Deer ( <i>Odocoileus hemionus</i> )	Mammal	Mule Deer Severe Winter Range CPW 2018	11%	0.41	CPW	11/8/18	C	G5 (Secure)	S4 (Apparently Secure)	Not Listed	NA	No

## Screening Criteria

Does the route or area intersect with impaired watersheds?	No
Does the route or area intersect with wetlands?	Yes
Does the route or area intersect with riparian areas?	Yes
Does the route or area intersect with FEMA high-risk flood hazard areas?	No
Does the route or area intersect with soils having erosion potential of 0.43 or greater (erosive soils)?	No
Does the route or area intersect with invasive plant species?	No
Does the route or area intersect with riparian or alpine vegetation communities?	Yes
Does the route or area intersect with critical habitat for species federally listed as threatened or endangered?	No
Does the route or area intersect with the wildlife habitat identified in the Colorado Parks and Wildlife Species Activity Mapping Data?	Yes
Is the route or area located within 0.5 miles of a nonmotorized trail?	Yes
Is the route, area, or parking location within 3 miles of a gateway community?	Yes
Is the route a trail open to all vehicles, with the potential conflict among different classes of motor vehicles?	No
Is the route a road where the desired maintenance level is not the same as the current maintenance level, and the motor vehicle use may not be compatible with existing conditions?	No

Is the route a ML3 road (or higher maintenance level) where the surface is native rather than gravel or paved and the motor vehicle class may not be compatible with the road surface?	No
Is the route a road where the desired maintenance level is not the same as the current maintenance level, and the speed, volume, composition, and distribution of traffic on this road may not be compatible with existing conditions?	No
Is the route a road that intersects major non-Forest Service roads such as country roads or state and federal highways?	No
Is the route a special use permit road?	No
Does the route or area intersect with wilderness areas?	No
Does the route or area intersect with Colorado Roadless Areas?	No
Does the route or area intersect with Forest Service Research Natural Areas?	No
Does the route or area intersect with National Scenic Trails?	No
Does the route or area intersect with Gold Medal Waters?	No
Does the route or area intersect with Browns Canyon National Monument?	No
Does the route or area intersect with wildland-urban interface areas?	No
Is the route planned for obliteration following decommissioning?	No
Is the route a ML3 road (or higher maintenance level), allowing for typical EMS services?	No
Is the route a road open to all vehicles (mixed use), with the potential for vehicle conflicts creating unsafe conditions?	Yes*
Does the route or area comply with the Forest Plan Management Area?	Yes















As previously mentioned, this road, according to Envision, is placed in the highest level of concern for Wildlife Habitat, the purple zone. Yet, when The Agency assessed the critical information, the road was given a high benefit rating compared to a low-risk rating. And the road is currently managed under a seasonal closure to protect the moderate rating for wildlife habitat and winter range. How is Envision's team of six people a better option to determine how and where recreation should happen on public lands for all users? The Rec Plan also only refers to Wildlife species in general:

***The wildlife tool is based on information about 44 species, current development, and research by biologists at CPW, USFS, BLM and other organizations. The resulting map, below, is a tool to help the county create opportunities that protect the wildlife users love. The Chaffee Rec Council will use this tool to focus recreation growth where it has the least impact.***

Yet, in the example above concerning NFSR 185.D, the only sensitive species identified in the area is Big Horn Sheep. Current seasonal closures on NFSR 185.D and the surrounding roads are in place because of their winter range. These seasonal closures are also not new; they have been in place for many years to manage the area. Much of the Rec Plan, in contract, reads as though all 44 species are in all the purple areas, any human interaction threatens all, and currently, these species are not protected by seasonal closures, which is not correct.

Seasonal Closures are in place for many routes within Chaffee County. The current Motor Vehicle Use Map shows all the roads with a seasonal closure. Currently, 42 motorized roads and trails are under a seasonal closure within the Salida Forest Service District. Again, this limits all types of recreation in these areas because the access is closed. Also, all the roads listed for seasonal closure on the Salida MVUM have undergone the same process as the previously highlighted NFSR 185.D. To take it a step further, just because a road or trail does not have a seasonal closure listed does not mean that road or trail is used year-round.

In most cases, only the routes that wheeled vehicles can access during all 12 months of the year are considered for seasonal closure. In most other cases, routes are seasonally closed by winter and are not accessible for at least eight months. Envision should not assume these routes pose a risk because they are not seasonally closed.

Salida Ranger District Seasonal Route Designations					
Note: The routes, mileposts and dates shown below may differ from current management strategies. Please refer to current Forest Orders for up to date information on the management of seasonal routes on the Salida Ranger District.					
Route Number	Legend	Dates Allowed	Beginning Mile Post	Ending Mile Post	
185		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	7.96	10.72	
185.D		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	0.29	3.93	
185.DA, 185.DB		Trails open to vehicles 50' or less in width, with seasonal designation May 1 - Nov 30	Entire	Length	
298		Roads Open to All Vehicles, with Seasonal Designation Aug 1 - Aug 31	0.00	0.42	
298.A		Roads Open to All Vehicles, with Seasonal Designation Aug 1 - Aug 31	Entire	Length	
308		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	1.20	5.19	
308.A, 308.B, 308.B2, 308.C, 308.H, 309.A, 309.B, 311.B, 311.D, 311.G, 375.B, 375.D, 376.L, 377		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	Entire	Length	
309		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	0.54	6.80	
311		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	0.90	6.81	
318		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	2.58	3.58	
329		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	2.91	4.07	
375		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	4.71	6.63	
376		Roads Open to All Vehicles, with Seasonal Designation May 1 - Nov 30	6.96	9.97	
1434		Trails open to vehicles 50' or less in width, with seasonal designation May 1 - Nov 30	1.02	5.80	
Note: Forest Order #PSICC-2016-15 requires additional temporary seasonal closures 12/1 through 4/15 on the following National Forest System Roads and Trails: 108, 173, 181.A, 184, 214, 214.AA, 214.D, 214.F, 221, 222.A, 322.A, 345, 1336, 1412.					

The following statement is one of the most concerning sections in the entire Draft Rec Plan.

***The Seasonal Protection program will implement a seasonal closure plan using the Recreation for Wildlife tools that show where animals are most vulnerable when they are concentrated to have young (production areas) and to find food when the winter snows are deep (map below). Implementation***



***will start with voluntary action with a more regulatory approach to follow only if required. Currently, just over 10% of roads and trails in these critical zones are managed with seasonal closures – we have the potential to do much better for wildlife now that we have the tools!***

CORE can't emphasize the inaccuracy of the above statement enough. There is a seasonal protection plan currently in place. Not all roads and trails are accessible year-round or during sensitive times for identified wildlife in specific areas. Seasonal closures are applied to accessible trails. **All** roads and trails in Chaffee County within National Forest have undergone wildlife risk assessment. The final Record of Decision for all these routes factored those assessments into the outcome. CORE is concerned with Envision's attempts to influence NEPA based on their wildlife assessments. NEPA is an information-gathering process; it does not make decisions. Why would Envision try to circumvent that process instead of actively participating in The Agency's public comment periods and submitting their concerns?

Envision is also **extremely** unclear which recreation groups these voluntary and then mandated seasonal closures would apply. Are they all recreation groups or just motorized? Currently, the only required routes seasonally closed are motorized, and the public may assume the above statement will apply to more motorized routes. However, substantial scientific research suggests non-motorized recreational use poses a more significant threat to wildlife. The following scientific review states: *"Counter to public perception, non-motorized activities had more evidence for a negative effect of recreation than motorized activities, with effects observed 1.2 times more frequently."*

Larson CL, Reed Se, Merenlender AM, Crooks KR (2016) Effects on Recreation on Animals Revealed as Widespread through a Global Systemic Review. PLoS ONE 11 (12): e0167259. Doi:10.1371/journal.pone.0167259

Is the public aware of this fact? Does Envision intend to implement seasonal closures for all users, and does Envision believe that is realistic? Will Chaffee residents voluntarily stay off the mountain bike and hiking trails the first nice days in March after a long winter? The recreating public deserves honest answers, and Envision should be forthcoming with its full intentions regarding 'voluntary' seasonal closures so the public can voice their opinions.

## **VI. Wildlife**

CORE is concerned with the lack of specific information provided throughout the Draft Recreation Report. Page 5 states this:

***Keep it Wild Local herds of elk, bighorn sheep, and mountain goat are really taking a hit as human pressure moves them out of high-quality habitat and shrinks the area they need to survive. 65% of key wildlife populations***

***are already in decline. The plan's Wildlife Tool maps critical habitat to focus improvements in the right areas and informs voluntary seasonal closures to give wildlife a break.***

A reader could easily assume that recreation is the driving factor in wildlife populations decline and that because of recreation, all wildlife in Chaffee County is in decline. Wildlife populations have the potential to be affected by numerous factors. Recreation is undoubtedly one of them, but focusing on one variable and magnifying it will not ultimately solve the problem.

The 2020 CPW Big Game Winter Range and Migration Corridors Report offers informative information on statewide population numbers, priority landscapes, and research areas. This information is not broken down specifically for Chaffee County because animals do not spend their time within a single county boundary. CORE suggests the best way to account for wildlife is through the current project evaluation and NEPA process used by The Agencies to inform a management decision. Looking at a small area instead of the larger region will not produce a better result.

<https://cpw.state.co.us/Documents/Hunting/BigGame/2020BigGameWinterRangeandMigrationCorridorsReport.pdf>

## **VII. Motorized Use**

Motorized users have been consistently grouped, and CORE does not feel these groups were sufficiently engaged or involved in developing the Draft Rec Plan. In many cases, Envision looked for a 'motorized person' to review and look at info instead of understanding the unique aspects of motorized recreation, the crossovers, and the differences within the user group. CORE was involved in presenting information to the Envision group to help understand the motorized user behavior profile and how motorized users address negative behaviors.

CORE suggested all recreational groups understand and promote the multi-use access of Central Colorado and respect the opportunities for everyone. CORE feels motorized use is perceived negatively, and users should understand the crossover and the areas where multi-use is likely to be encountered. Envision captured this information to suggest motorized groups are responsible for educating non-motorized users, which is not correct.

***Outreach by the groups also involves education to non-motorized users, that they should expect to hear engine noise if they are in an area that allows motorized recreation.***

Many trails are multi-use but are not presented as such. This lack of information confuses users and does not manage or set their expectations for what they may encounter during their time. This is a contributing factor to the 'user conflict' suggestion. Users experiencing something they are not planning for can be seen as a conflict.

This should not be looked at as a Motorized User Issue and Envision should prioritize information distribution among all groups to counter these issues. The Draft Plan and Survey results suggest motorized recreation is everywhere and is disturbing all other forms of recreation, specifically quiet users. This is also an incorrect assertion, Chaffee County is bordered by three separate Wilderness Areas, two within eyesight of Buena Vista and one near Salida. There is ample opportunity for quiet recreation within Chaffee County.

Additionally, when compared to the overall acreage of the Salida Forest Service District, motorized roads and trails comprise a very small percentage of area. The Salida District has 498.8 total miles of motorized roads and trails. Assuming a 200' buffer for each road and trail mile, that accounts to 12,092 acres of land. The entire Salida Forest Service District is 440,000 acres. Motorized roads and trails account for only 2% of all lands within the Salida Forest Service District. 98% of the Salida District is quiet use and there is ample opportunity for all recreation desires without conflict or 'noise'.

The Draft Rec Plan suggests one motorized project, The Triad Ridge Singletrack. The Rec Plan states:

***"Motorized singletrack connectors to enhance capacity and efficiency at Triad Ridge in South Fourmile."***

This suggested project would seem to be in response to the survey results, however, a small singletrack section in an already small area for singletrack would not alter the available experience greatly. Additionally, motorized singletrack is the most restricted motorized asset because only two-wheeled equipment can use it. By contrast 'roads' can be used by all motorized equipment. The Agencies should take motorized proposals directly from motorized groups to best service these users.

Thank you for considering these comments. CORE will continue to follow the Envision process and the Recreation Plan.

Thank You,

Marcus Trusty  
CORE Founder/President