



Royal George Field Office
Att: Kalem Lenard
3028 E. Main St.
Canon City, CO 81212

Dear Project Team:

Please accept this correspondence as to the above organizations' comments about the Chaffee County Camping Plan and Travel Management Environmental Assessment (referred to as the "EA") after this.

The Organizations are not entirely in support of any of the Alternatives. They all close far too many campsites and too many roads. Alternative B is the most restrictive and highly unacceptable to the Organizations and our members. Alternatives C & D have some positives but are not enough for us to support outright. The following comments detail our concerns and recommendations.

I. Partnership

CORE was formed in 2017 to help educate public land users about stewardship and ethics from a motorized user perspective. We also partner with the Royal George Field Office (RGFO) and the Pike and San Isabel National Forest (PSI) to help with trail maintenance and user management. We have spent thousands of volunteer hours removing trash, cleaning up abandoned long-term camps, containing campsites, mitigating and repairing off-trail issues, and working with the Agencies to help in any way we can.

COHVCO has consistently empowered its 2,500 members to represent, assist, educate and empower all recreationists in the protection and promotion of off-highway motorized recreation throughout Chaffee County. COHVCO is also an environmental organization that advocates and promotes responsible use. Conservation of our public lands has supported the work of all motorized groups within Chaffee County.

The TPA is an advocacy 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 motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities.

As part of the Organization's ongoing relationship with the RGFO, we appreciate the BLM's response to ongoing motorized user concerns. However, the draft EA does not offer many positives for motorized users and multi-use public land access. The RGFO poses no solutions for many areas, closure is the default answer, and many hypotheticals and opinions lead to this conclusion. The EA shows the gap between the RGFO and the motorized user. We will strongly reiterate that multi-use recreation is almost always based on access from 'motorized' routes. This would include non-motorized users accessing public land for other forms of recreation via the road system. This EA continues the failure of misunderstanding that relationship. The Organizations have consistently tried to work with the RGFO to close this gap, and this EA is an example of that gap continuing to cause issues.

II. Travel Management

The Organizations have contended from the beginning that this project is a Travel Management Plan despite BLM's assertions to the contrary early on, and we appreciate BLM's acknowledgment of that fact in the EA. However, this highlights the concerns from the Organizations that the BLM would use this opportunity to justify closing public routes. That has happened in this EA, and we do not outright support any alternatives relative to Travel Management. Alternative C does have a few positives, but Alternative A (existing management) at this point is the best option moving forward for adequate motorized access and multi-use recreation.

The Organizations are frustrated that the RGFO is creating problems where they don't currently exist and then citing closure as the only remedy. Several routes in the project area do indeed intersect private land, but many of those do not now have conflict or issues. Today you can drive all the routes slated for the Administrative Use designation in the Pass Creek area without on-ground resistance or restriction. Yet, BLM's solution to these non-issues is to close them to public use. Why is existing management not a viable option? And why is there no attempt at gaining an easement across the private land either through a Prescriptive Easement or a purchase agreement? The FO could apply for an OHV grant to purchase easements for continued motorized use to keep the existing route network intact. The EA states that 15.5 miles of inventoried routes are without a public easement. Surely there is a workable solution for that small of mileage. It's not as impossible as if there were 100s of documented miles without a possible easement. Local motorized groups would willingly partner in this proposition if the FO were to look at options other than closure.

The RGFO also reduces the value of several routes within the project area to justify closure in section 3.3.2.3 on page 51.

The average length of a closed route of 0.2 miles indicates that only minor short spurs are being contemplated for closure under this alternative and therefore this does not represent a significant loss of motorized public access to public lands. Those wishing to visit these areas would on average only have to travel by foot or horse an additional 0.2 miles from the closest designated motorized route. No major loop opportunities or major public access points would be closed under this alternative so there is not anticipated to be impacts to recreation opportunities.

This justification is purposefully diluting the importance of some routes by including the numerous short camping spurs within the Shavano Area and some in the Misc. Lands Area. Roads 5019, 5033, and 2055 are not short camping spurs, yet the above justification removes their importance to recreation and overall access. The public would need to hike **much** further than .2 miles for area access. Camping spurs and extremely short sections going to a single campsite are one thing but suggesting there is no loss of access when three desirable roads stand to be closed is not correct.

III. Project Prejudice

This RGFO has continued to be plagued by influence and undo pressure by the Envision Chaffee County and the Chaffee County Outdoor Recreation Management Plan. On the eplanning Project Homepage, the BLM acknowledges the basis for this project was in response to local property owners, recreators, and grazing permittees and recognizes that the project **was in response to, and aligns with, the Envision Chaffee County Project**. This project continues to claim that recreation and camping are out of balance within Chaffee County and require correction by recreation restrictions. This group cites exploding state populations, dwindling wildlife populations, and countless impacts on lands within the county boundary. Continually talking about these issues has led to prejudice and negative perspective toward recreation by BLM staff. The frequently cited problems are without merit or accompanied documentation corroborating the claims. The Organizations have raised these issues countless times. We have offered science-based expert opinions and documentation and have asked questions that have yet to be answered by Envision Chaffee County or the RGFO. Public Land management decisions and projects require the utmost objectivity and quality information to manage for a broad range of uses, and continually hearing a negative opinion of recreation is influencing the RGFO and this project. The subsequent comment sections will provide examples of this unfortunate occurrence.

IV. Population Data

This project cites a 2017 Denver Post article with a population trajectory continually climbing upward as if Colorado would be run over by people in the mid-2020s and continually toward

2050. The EA also refers to this information in section 3.3.4.2 on page 57. Unfortunately, the cited population article is located behind a paywall, so the public cannot easily access the data without becoming a website subscriber.

This talking point (mass population increase) has continued to dominate the Envision Chaffee County meetings with BLM's staff participation. Recreation restriction has constantly been discussed as the only remedy. Citing this fear continually and repeating this concern does not make it a reality, especially when current data refute the endless population claim and show the reverse is currently happening in Colorado. Yes, there was an upheaval in people's habits and public land use in 2020. However, use in trail season 2022 is down from the past two years and closely resembles the use seen in 2019. The Organizations provide substantial volunteer hours within Chaffee County and have noted camping, vehicles, and general trail use to be consistently down in 2022 compared to 2020 and 2021.

A more recent state population analysis also refutes the BLM's reliance on the exploding population cited in the 2017 article. Fox 31 News in Denver ran an article on their website on October 6th, 2022, titled "More people are moving out of Colorado than moving in." The first sentence in the article states:

DENVER (KDVR) — More data is coming in that suggests Colorado's decade-long population eruption has ended.

The article goes on to say:

HireAHelper, an online moving service, [analyzed over 90,000 moves](#) that took place over 2021. In Colorado, 15% more people moved out of the state than into it over the year.

There is also a warning in the article about using population data in the 2010s (this EA) as a guide:

This outflux is a turnabout from the 2010s, during which Colorado gained 750,000 people. State demographers had warned that the trend was slowing in the late 2010s and early 2020s, despite the homebuying melee brought on by out-of-towners looking for outdoors adjacent homes.

Colorado gained 27,761 people in 2021, which is the smallest population gain since 1990. Colorado's population growth peaked in 2015 with nearly 100,000 more residents and has slowed most years since then.

A Washington Examiner Article Dated February 15th, 2022, cites this information:

Fewer people are moving to [Colorado](#), according to a [census](#) analysis by the Centennial State's [demography](#) office. A mere 27,337 people moved to Colorado in 2020, and that number dropped to 14,731 in 2021, according to a [report](#).

The Washington Examiner Article goes on to say:

In addition to the state's lack of people moving in, Colorado's overall population growth has taken a hit due to decreasing birth rates and an accompanying death rate increase, Garner said.

The RGFO should update their perspective, projections in this EA, and management prescriptions to reflect the most current data on Colorado's population and trends. Continuing to prepare for theoretical mass increases in people and the damaging impacts to public lands does not use the best information and data available. This also does not adequately address the future project decision to address existing issues.

V. Wildlife Data

The wildlife data in this EA is based on cursory rationale and GIS analysis, but what is lacking is the specific adverse effect on any of the local big game populations cited as having issues. All the recommendations and projections are based on hypothetical impacts involving worst-case scenarios. This is highly speculative and does not rise to the level of significant impact. Envision Chaffee County and the RGFO have consistently claimed herd number decline and continue to claim recreation-related animal behavior issues. The assumption is that recreation causes animals to adjust their behavior because they may look at trail users, they could flee trail users, or they could have temporary avoidance of trail users, but that does not automatically result in a population-level impact. Envision and the BLM cannot show a population level impact because it does not exist for the big game herds that are in, or crossover through, the Chaffee County Area.

The Envision Chaffee County Outdoor Recreation plan on page 4 states:

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 restriction strategies to give wildlife a break.

The BLM has echoed this same language in section 3.3.3.6 on page 56 of this EA:

Based on trends of land use and population growth, the rates of human disturbance on wildlife and habitat would increase. Increased disturbance to wildlife and reduced habitat quality would likely have negative impacts on important wildlife population parameters such as overwinter survival, reproduction, and recruitment of young. As a result, the decline and stagnated growth of big game populations currently being observed could be exacerbated.

The problem with both statements is that big game numbers do not support these claims. The Organizations have attached several reports with these comments. The elk plans for E17 and E22 are attached and are the two units that cover Chaffee County. Both units have seen a significant increase in the goal since 1990, and the populations appear largely steady or slightly increasing; CPW has also confirmed the general trends. CPW updated the elk numbers in their 2020 winter range report (attached), and on page 11 of that document, E22 was estimated to be more than 10 above the goal in that report, and E17 was found to be at the goal. The assertion that elk populations are “really taking a hit” is unfounded and not supported by CPW’s data, and the BLM’s EA language is also incorrect. Stagnated growth is being used as a negative but could also be attributed to the numbers being at the population goal. But again, based on the data, there is no direct negative impact on herd numbers in Chaffee County.

For Bighorn Sheep in the area, attached reports S11 and S17 indicate the population has increased from 225-375 and was just accounted for in 2020. CPW has not published the other two units, but statewide the Sheep population cumulative for S01 to S86 has risen over the past three years, from 6,850 to 7,085.

The Mule Deer analysis has consistently had problems reporting an accurate count for unit D16, so the 10% below target in the report is questionable. D15 shows an increasing number of deer but below objective and has been historically below objective. Primary issues for this are noted as cougar predation and farmland conversion.

After reviewing this information, the question remains, where is the direct recreation association with a negative population-level impact for big game herds within Chaffee County? If Alternative A shows current management, how can BLM attribute this current level of use and recreational opportunities to big game herd numbers that are not declining? Especially when the RGFO has done zero management due to not having a travel management plan for many of the project areas and not having a camping management plan in place for the project areas.

Additionally, a peer review was done to evaluate the wildlife data used to create the Rec Plan and the Wildlife Tool. That review is attached to these comments. As of the writing of these comments, neither Envision nor BLM has addressed the questions or recommendations within that peer review for the Chaffee County area. The Organizations recommend to the RGFO staff to go back and rework the wildlife portion of the EA to only include actual on-ground instances within the project area for specific wildlife population decline. We also recommend taking out all speculative hypotheticals which are not substantiated.

VI. Erosion/Watershed Concerns

The project EA has many references to the potential for erosion and makes references to the watersheds for each road. And the preferred Alternative D includes this discussion:

Decommissioning or closing BLM routes (11.18 miles) under this alternative can reduce erosion risk to the entire route area. Soils in and around routes can slowly re-vegetate, decreasing the ability of water to detach soil particles and destabilize slopes and move sediment. Some of the closed routes are located on soils with severe erosion hazard rating for roads/trails. Differences in effects from route closure between Alternatives D, B, and C are negligible, though these closures are expected to have beneficial effects at the local (and potentially watershed) scale.

The Organizations would like to point out that the RGFO is suggesting the justifications for closing 11.18 miles of routes within a 13,000-acre project area are speculative at best. If there are erosion and watershed issues on these routes, they would currently be taking place and should have documentation as to the exact location and issue. The context of this discussion is also perplexing, given that there are only 44 total miles of routes within the 13,000-acre project area. To compare how much area the routes are comprised of, we can make an easy comparison. Assuming routes are 12 feet wide, the following calculation can give us some needed context.

44 miles x 5,280 feet per mile = 232,320 linear feet of routes.

232,320 linear feet x 12 feet wide = 2,787,840 square feet of area for the route mileage

2,787,840 square feet / by 43,560 (square feet in an acre) = 64 acres

That is 64 total acres of the area, which are taken up by the 44 miles of roads in this project. A simple comparison back to the 13,000-acre overall area will show that total road mileage (44) takes up .4% of the project area. Not only is .4% hardly significant (**less than one-half of one percent**) for discussion, but the RGFO then goes further and suggests that 11 miles of road closures will somehow reduce erosion risk and protect watersheds at the local level. That is a significant stretch as erosion happens everywhere within Chaffee County BLM-managed land regardless of roads and camping due to the topography, semi-active natural washes, and the high desert environment encompassing these segmented project areas. Closing 11 miles of routes within 13,000 acres for erosion will have no measurable impact.

VII. Managing Camping with Road Closures

Section 3.3.4.2 Reasonably Foreseeable Environmental Trends and Planned Action in the Area continues to offer worst-case scenario hypotheticals with no project area specifics.

In addition to the increase of impacts to aquatic resources on BLM managed lands due to the increase of camping on BLM managed lands, this trend of increasing population and tourism to the area has resulted in impacts to aquatic resources due to surface

disturbance and development on non-BLM lands. The magnitude of these impacts is also expected to increase.

And then the immediate justification for the Preferred Alternative D the EA states:

Alternative D includes the closure of some routes and camp sites as well as the ability to regulate camping and mitigate impacts.

The Organizations are highly against road closures as a management prescription to deal with camping impacts. Our scoping comments conveyed our position against closing roads and recreational assets to deal with camping impacts. Negative camping impacts require camping management, and closing areas so the public simply cannot reach them is not management. Those same impacts will continue to show up without management.

VIII. NEPA Concerns

The Organizations originally submitted these same comments during scoping, and we are re-submitting them because we continue to have these same concerns with this project. Accurate information is critical in developing public comments and involvement as frequently, members of the public do not have time, resources, or understanding to make these connections. The RGFO has complicated this issue by directly having BLM FO staff involved at the Envision Rec Council and Planning level while running this Project. These concerns are summarized in the NEPA regulations, which require high-quality information to be provided in the NEPA process. NEPA regulation provides as follows:

NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. ***The information must be of high quality. Accurate scientific analysis, expert agency comments and public scrutiny are essential to implementing NEPA.***

The BLM RGFO has acknowledged that this camping project originated from Envision Chaffee County and that this project is in line with the goals developed by the Envision Chaffee County Process. Unfortunately, the Envision process was not created under NEPA, and the BLM RGFO's involvement has created a web of confusion for the public. Envision was a county process primarily targeting county residents, but the RGFO is responsible for public land management for all users, not just county residents. The public is confused mainly by land management projects in general. Envision has only served to add another layer to that confusion and the understanding of who ultimately manages the land. Who finally decides management? Is it the BLM RGFO, or is it the county through Envision? The RGFO should remove itself directly from the Envision Process to ease public confusion about who is running the Project. RGFO staff should have no direct involvement with any Envision Position. When appropriate, the RGFO should invite county staff and county officials to cooperate with the RGFO on projects.

Envision and the BLM RGFO have repeatedly cited the 'Cooperating Agency' standard for why the BLM RGFO is at the Envision Table for ongoing discussions, but why was the Chaffee County Commissioner responsible for public land issues not part of the BLM's ID team on this Project? Why was nobody from the county's affordable housing initiative on the BLM's ID team for this Project? This Project would seem the perfect opportunity to involve Chaffee County as a Cooperating Agency. The RGFO should have county personnel with specific knowledge engaged at the project planning level. However, the RGFO felt it is necessary to be part of the Envision Process on the Envision Rec Council and then stack a subsequent BLM project and NEPA on top of Envision. The RGFO also could not confirm that Chaffee County, as an entity, commented during the scoping of this project. Chaffee County is a cooperating agency and adopted the Envision Chaffee County Outdoor Recreation Management Plan into its comprehensive plan. The county should therefore submit comments for this project concerning their interests.

Envision's process was rife with errors and inaccurate scientific analysis. CORE, TPA, and others frequently pointed out these facts, and the RGFO was served with a letter detailing a peer review of Envision's Wildlife Data. This review (attached to these comments) called into question numerous aspects of the Wildlife Tool responsible for helping to develop the Chaffee County Outdoor Recreation Management Plan. The RGFO has acknowledged that this camping plan follows the Rec in Balance Plan but has not responded to the Wildlife Plan's scientific issues. The RFGO project page for this Proposal links directly to the Envision Rec in Balance Plan. How can the BLM now run a project and subsequent NEPA on top of these glaring scientific problems? How can a NEPA, which is supposed to contain '**Accurate scientific analysis,**' be based on a county project with in-accurate scientific analysis? How can the RGFO satisfy public scrutiny as part of a public project started in a separate process lacking public scrutiny?

The Organizations continue to recommend the RGFO remove its participation directly from Envision. The Organizations also compel the RFGO to request Envision fix the wildlife issues associated with the Envision plan before proceeding with this project and future projects.

IX. Pass Creek

The Organizations are recommending Alternative A. (current management) for the Pass Creek Area. These roads do not have resource impact or off-trail issues. BLM Roads 2006, 2007, 1096, 1106, 1108, and 1109, 1096, 1309, and 1099 provide access to the Pass Creek area and are frequented by 4x4 drivers and hunters. We appreciate Alternative C keeping open 2006, 2007, and 2055 and some additional small sections. We recommend keeping these three routes available for public use as they are vital for multi-use, motorized, and hunting recreation. For the other routes listed in the pass creek area, the BLM claims to have no easement. The Organizations recommend Alternative A for these routes because there are no current clashes with property owners and no recent interpersonal conflicts. The Organizations also recommend

the BLM seek easements, either prescriptive or otherwise, to maintain public access for these routes.

X. Misc. Lands

The Organizations recommend Alternative A (current management) for this area, and we are opposed to closing BLM Roads 5033, 5019, and 5012. We are pleased to see Alternative C keeps 5012 and 5033 open, but multi-use recreation, motorized users, and hunters require access on all three routes. All three roads access National Forest-managed lands and are used for 4x4 driving and hunting.

These roads are also an excellent option for 4x4 driving during winter when other roads in Chaffee County are not accessible due to snow. Closing these roads will negatively affect hunting access and 4x4 driving. 5019 does indeed go to National Forest-managed land. Still, the San Isabel National Forest TMP is finally finished, and this route could now be considered for inclusion in the route system.

XI. Shavano

The Organizations are recommending Alternative C for the Shavano Area. Keeping 1002, 1030, and 1066 open for public use will help balance the need for access in this area and help control camping and the numerous interconnected routes.

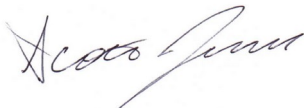
Thank you for your consideration,



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