



April 24, 2018

USDA Forest Service
Region 2 Rocky Mountain Region
Attn.: Objection Reviewing Officer
1617 Cole Boulevard, Building 17
Lakewood, CO 80401

**RE: Objections to the
DRAFT DECISION NOTICE AND FINDING OF NO SIGNIFICANT IMPACT, BADGER FLATS MANAGEMENT
PROJECT, U.S. FOREST SERVICE, PIKE NATIONAL FOREST, SOUTH PARK RANGER DISTRICT, PARK COUNTY,
COLORADO
March 2018**

Dear Objection Reviewing Officer:

The following objections are submitted in regards to Draft Decision Notice and Finding of No Significant Impact, Badger Flats Management Project, U.S. Forest Service, Pike National Forest, South Park Ranger District on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. 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 riding opportunities. COHVCO is a grassroots advocacy organization representing approximately 150,000 registered off-highway vehicle ("OHV") users in Colorado seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations. TPA and COHVCO are referred to collectively in this correspondence as "The Organizations." The Organizations previously submitted Objections to the Badger Flats Management Project, Environmental Assessment, South Park Ranger District, Pike & San Isabel National Forest, October 2016, in a letter dated November, 2016 citing similar objections to those listed below. The Organizations' objections to the Proposed Decision and Action prepared for the Badger Flats Management Project are listed below:

1. The Proposed Decision and Action intends to close NFSR 44 (along with NFSRs 44.2C, 44.2B and NFSR 280) on the west side of La Salle Pass. The Organizations contend that only NFSRs 44.2C, 44.2B and 280 need consideration of curtailment of access. That NFSR 44 should remain open to public access,

or if absolutely necessary the alignment of NFSR 44 could be adjusted, re-routed or offset. The Organizations contend that the existing centerline of NFSR is ½ mile or more from the terrain suitable for cliff-nesting raptors. NFSR 44 is one of the primary and often the preferred route for motorized travel over La-Salle Pass. That NFSR 44 and NFSR 44.2A together provide a loop opportunity, and an opportunity to disperse recreational uses on the west side of La Salle Pass. Closure of NFSR 44 (a primary route to La Salle Pass) to public access will concentrate all use onto 44.2A completely eliminating the unique experiences to travel through the center and northern portions of the open meadow landscape. Additionally, NFSR 44.2A is the more difficult route and includes rock obstacles that some users may not desire to traverse.

2. The Proposed Decision and Action fails to include any consideration for an open riding area specifically for motorized trials bike riding. Historically the Rocky Mountain Trials Association (RMTA) has worked with the South Park Ranger District to obtain land use permits for observed trials riding in the Thorpe Gulch area. A request was specifically made in our previous comments to consider a designated open riding area for the purpose of motorized trials riding. The Proposed Decision and Action fails to include any consideration of an open trails riding area in the vicinity of Thorpe Gulch or anywhere else with the Badger Flats Management Project Area. The Organizations remedy for this objection would be that the South Park Ranger District confers with the RMTA and that the Proposed Decision and Action be revised to include a suitable designated area specifically for open motorized trials riding (i.e., without a special use or other permit and open for use year round). The TPA supports RMTA's objection comments submitted under a separate document and the club's proposals for providing open trials riding areas.
3. The Proposed Decision and Action proposes to decommission NFSR 214.B, a connecting segment that our previously submitted comments specifically requested be kept open to public use. The Environmental Assessment for this project provides no reasonable justification for the decommissioning of NFSR 214.B. NFSR 214.B provides a direct connection between two proposed designated dispersed camping areas and failure to keep access open on NFSR 214.B results in a dead-end, no direct connection between the two proposed designated dispersed camping areas and completely eliminates a popular looped recreational opportunity. Remedy of this objection can be accomplished by eliminating the decommissioning of NFSR 214.B and keep NFSR 214.B open to public use.
4. The Proposed Decision and Action does not go far enough in converting "roads/NFSR" to "trails open to all vehicles/NFST" (aka "Full-size Trails). The primary use of roads in the Badger Flats area is indeed for "recreation". Trails are well suited to recreational uses and are often preferred for recreational purposes. The level of maintenance can be reduced for trails vs. roads, conversion of roads to trails can make the route eligible for State OHV grant funding, travel speeds on trails can be reduced and therefore improve the safety of the route, and finally volunteers can be employed to help maintain routes designated as trails. The Proposed Decision and Action needs to designate and convert the majority of roads in the Badger Flats area as "trails open to all vehicles" and remove the routes from the formal "roads inventory".

5. The Organizations would welcome a discussion of these objections 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, e-mail: williamalspach@gmail.com.

Sincerely,

Don Riggle

D.E. Riggle, Director of Operations
Trail Preservation Alliance



Scott Jones, Esq.
COHVCO

cc Josh Voorhis, District Ranger, South Park District Ranger