



April 30, 2018

Travel Management
Pike & San Isabel National Forests
2840 Kachina Dr. Pueblo, CO 81008

Submitted via email to: comments@psitravelmanagement.org

**Pike & San Isabel National Forest, Travel Management EIS
Comments regarding NFSR 346 (aka Hotel Gulch)**

Dear Supervisor Connelly:

Please accept these comments regarding the Pike & San Isabel National Forest Travel Management EIS Project on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO").

A recent update to the Pike & San Isabel National Forest Travel Management EIS Project's website posted a "Tabular Summary" of the Draft DEIS Action Alternatives (Alternatives B-E) of roads and trails for motorized vehicle use on the Pike & San Isabel National Forest (PSI). In review of that tabular summary, the TPA and COHVCO observed that **NFSR 346 (aka Hotel Gulch)** on the Pikes Peak Ranger District has proposed actions to "**convert to admin use only road (ML2)**", from mile posts 1.00 to 2.57 for all Alternatives B through E.

During the Project Scoping Phase, a preponderance of public comments (*over 80 individual statements*) were made testifying to the public's desire that NFSR 346 (aka Hotel Gulch) remain open to public access, yet the DEIS appears to be completely ignoring those public comments and public sentiment and currently proposes to close NFSR 346 to the public. The DEIS does not include in Alternatives B-E even a single course of action that responds to the stated public requests to keep access to NFSR 346 unrestricted and open to public motorized use. The TPA & COHVCO contend that during the Scoping Phase, there is likely to be no other single road that received as many public comments expressing support to keep NFSR 346 open to public access, yet the USFS has chosen to ignore those public comments and fails to offer a reasonable alternative that adequately addresses the desires of the public to keep access to NFSR 346 open. This disregard for the public's input and comments undermines the integrity of the USFS's EIS process and credibility with the public. It is simply disingenuous and

insincere to ask for the public's input and then so purposely and callously ignore the public's desire. The TPA and COHVCO request that the entire length (i.e., MP 0.00 to MP 4.90) of NFSR 346 have a proposed action of "keep as is" in at least Alternatives C & D, that the ongoing analysis includes keeping NFSR 346 open to public access (i.e., "keep as is") and that the DEIS be modified accordingly.

As stated previously in our comments, **we do not agree or support any action that limits access or closes public access to NFSR 346.** 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 and corridor 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 corridors of SH 67 and NFSR 300. The roadside vegetation along NFSR 346 is well established and stable for the entire length from SH 67 to NFSR 300 and the number of stream crossings is nil. The soil types within the watershed are typical of the entire Rampart Range. The slope aspects along with the soils have resulted in well 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 (except for a very short segment just north of the intersection with NFSR 346.B which could easily be mitigated with minor grading), and hill slope vegetation is well established and very mature. In order to maintain public access, we would support conversion of NFSR 346 to a Full Size Trail or "trail open to all vehicles".

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

Sincerely,



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