

September 7, 2016

Attn: Erin Connelly, Forest Supervisor
The Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands
2840 Kachina Drive
Pueblo, CO 81008

**Pike & San Isabel National Forest, Travel Management EIS
Initial Comments**

Dear Supervisor Connelly:

Please accept these comments on the Pike & San Isabel National Forest Travel Management EIS Project on behalf of the Central Colorado Mountain Riders (CCMR).

The CCMR is an OHV club in Salida, CO. Our mission focuses on education, advocacy, and stewardship, and our membership enjoys not only OHV use within the forest, but also hiking, mountain biking, hunting and fishing, and dispersed camping as well. Our club has adopted several motorized trails on the Salida Ranger District, and look forward to helping the Pike/ San Isabel National Forest educate, manage, and promote OHV use over the years and decades to come.

From our perspective, the chance to do travel management is an opportunity to improve the overall travel infrastructure in the Forest. The Forest should not attempt to limit the scope of inquiry to simply appease an ill-conceived lawsuit with this exercise, but instead, they should look to make a legitimate long term improvement for the future of the Forest, both for users and natural values. These two goals are absolutely compatible.

Good trail systems, those which are well designed, enjoyable, and sustainable, enhance both user experience and natural values and habitat. As people find what they came for, they are not tempted to go beyond the established trail network, which protects natural habitat. Therefore, the Forest has an opportunity in this exercise to improve not only the OHV user experience, but also to improve habitat and natural values in areas away from trails. One need look no further than the excellent trail system on BLM at Hartman Rocks, or the new singletrack system at Rampart Range, to see how improved opportunities have virtually eliminated off-route travel. Opening routes that meet user needs legitimizes closing routes that are not sustainable, it is truly a win-win situation.

OHV use has grown incredibly in Colorado over the last few years- resident permits have gone up by 119% between 2000 and 2014, and non-resident by 1607%. OHV use accounts for \$1.5 Billion in the Colorado economy today, and there is no reason to expect this growth to slow, so the current travel management exercise must imagine a

Forest with many times more users on whatever trails result from the current process in the years and decades to come. Thousands of people depend on the OHV industry for their work, and in the spirit of Multiple Use/ Sustained Yield, the Forest must work to accommodate that.

While trail systems cannot grow commensurately with use, it is vital that this travel management plan recognize the cumulative demands on the Forest, to avoid excessive impact to areas that remain available for use. Miles traveled in the forest do not drop as miles available for travel do, meaning that remaining routes become overused and unsustainable to maintain, not to mention dangerous. Open OHV routes are also critical for Search and Rescue activity, increasing safety for all users.

With these general comments in mind, here are some specific comments and recommendations from our club.

- 1) Preference for Alternative D: After careful study of the different alternatives, our group believes the best option for sustainable multiple use trails is Alternative D. Along with the TPA and COHVCO, we support modifications to this plan.
 - a. Full Implementation of the South Rampart Travel Management Plan developed in 2011;
 - b. No conversion of NFSR 346 to Administrative Use Only, but maintain NFSR 346 open to public access;
 - c. Reopening of NFSR 322A; and
 - d. Reopening and reestablishing public access across the South Platte River in the Hackett, Longwater and Metberry Gulches.
 - e. Addition of Trials riding areas near Rainbow Falls on Pikes Peak RD;
 - f. Addition of Trials riding areas in Badger Flats and Sledgehammer areas on South Park RD.
 - g. And other changes on the Salida Ranger District as detailed below.

2) Seasonal closures:

Alternative D proposes multiple seasonal closures for trails within the Salida Ranger District. These closure dates are not consistent with other trails in the area (for example, the Cottonwood Mountain Bike trail), do not affect all users (only motorized), and seem unnecessary given the realities of weather and snow in the area.

We propose that seasonal closures be limited to areas where they are deemed necessary for winter range or other wildlife habitat concerns, using best available science and recognizing the change in climate patterns toward warmer and shorter winters, and earlier calving activity.

Further, for these closures to be effective, they should affect all users, not only

motorized users (see “Domestic Dogs in Wildlife Habitats”, Carolyn A. Sime). Singling out only one use is ineffective and discriminatory, and belies the larger goal of protecting range and condition of trail tread, which is impacted just as much by people on foot, horse, or bicycle.

Further, they should be consistent within the area- the established baseline is the Cottonwood MTB trail which has a 12/15-3/15 closure, so any trail that needs a seasonal closure should match that standard. A simple and consistent closure schedule will make communication easy and enforcement possible.

3) De-facto over snow travel planning:

The proposed seasonal closures seem to amount to de-facto over snow travel planning, especially for new vehicle types (e.g. motorized snow bikes) that can access the forest differently than in the past.

This de-facto travel planning is not adequately addressed in the current route inventory process, since these vehicles are not confined to routes in over-snow travel, and managing their travel will require proper scoping and public engagement, which this process does not satisfy.

The Forest should seek to understand what uses may become more popular, look for opportunities for those uses that are consistent with the Forest Plan, and engage in a scoping process with that perspective in mind, rather than attempt an illegitimate de-facto closure through a tangentially related process.

4) Necessity of landscape level cumulative effects analysis:

As noted above, OHV ownership has been exploding in popularity, and OHV users will travel to whatever area provides the experience they are looking for. Therefore, route closure does not tend to diminish OHV travel on the Forest, but rather shifts it to another location. This has implications for the Forest at both large and small levels- where a user might choose to ride within their day, and where they might choose to stage for that day. We will address both of these concerns- within the day specifically route by route, and where they might choose to stage in this section.

We contend that it is illogical to consider route closure exclusively on a route by route case basis, because this misses the point that miles traveled are more fixed than miles available for travel. Route closure in one area will result in increased pressure on another. Some of the alternatives (for example, Alternative B), create so much closure that in areas along the front range (for example, the 717 trail system near Woodland Park) that users will be forced to continue along Hwy. 24 until they get to the next option, which is likely to be the Four Mile area on Salida Ranger district. Four Mile has one motorized singletrack route, which

takes less than 30 minutes to ride completely from end to end, leading to a problem that the existing trail system does not meaningfully satisfy demand, leading to a proliferation of non-system routes. We have specific suggestions within that area, however, at a landscape level, the important concept is that cumulative effect of a closure near Woodland Park extends to everywhere else on the forest.

Furthermore, to the degree that non-system routes are in use, the Forest is challenged to do a complete cumulative effects analysis, because the information they operate from is incomplete. We hope that the Forest will be able to put real effort into a landscape level cumulative effects analysis and share the outcome of that work with our club.

5) Notes on specific routes called out in lawsuit.

1. We understand the popularity and regional importance of the Four Mile Trail System near Buena Vista. We also understand that this area has seen increased use by all types of users and that the use of this area will continue to grow, especially if any of the proposed closures (in Alternative B, for example) take effect along the front range.

Under a contract from the USFS, Great Outdoors Consultants created GPS maps of many potential routes in the Four Mile area. We were unable to get access to the resulting map, which is USFS property, but we believe that certain of these routes should be selected for adoption as system trails (as PSI has recently done with the buckhorn trail near Colorado Springs). There should be more than 40 miles of total singletrack system route mileage so that, when combined with Forest Roads and 50" trails, a visitor has a realistic amount of riding to justify the travel required. This will legitimize closures of unsustainable trails that have become pervasive.

2. We would encourage and support the District's decision to convert most any existing National Forest Service Road (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50" or less in width), whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds.

We encourage the use of 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.

3. The importance and unique multi-use recreational qualities of the Rainbow Trail cannot be overlooked. Although NFST 1336 (AKA The Rainbow Trail) was not specifically listed in Exhibit A of the Settlement Agreement, we feel this trail is vitally important to meeting multi-use recreational needs and demands of the area. We support the District's efforts, past and present, to maintain this trail and especially the needs for routine and continued "heavy maintenance".
4. NFSR 102. - This route needs a legal connection to provide access to NFST 1336 (AKA Rainbow Trail). All trail users will benefit from this connection by creating loop opportunities along the Rainbow trail.
5. NFSR 108. - This route is a common "loop" off of the Rainbow Trail from both NFSR 101 & NFSR 124. NFSR 108 is the most direct access to the Rainbow Trail from Salida. This route also provides access to private land and is the road to the radio towers on Methodist Mountain. It is commonly used by motorcycles and mountain bikes for loops. NFSR 124 is a vital loop connection and bailout point for all users.
6. NFSR 186. - This route makes a nice loop with NFSR's 186B and 174A. User groups include mountain bikes, motorcycles, UTV's, ATV's, jeeps, and hunters.
7. NFSR 205. - This route provides a good exit/entrance to the far western part of the Rainbow Trail without using HWY 285/Mears Junction access. Allows users to loop off the Rainbow Trail back to NFSR 201. Congestion between all users at Mears Junction/ Shirley Site can be alleviated by leaving this route open.
8. NFSR 218. - This route provides easier access to Lost Creek and is popular with hunters, mountain bikers, UTV's, ATV's, motorcycles and hikers.
9. NFSR 225. – Extension of this route would provide an important and vital connector and option for motorized users. It would provide an alternate route

- to HWY 50 and the very popular crest trail and/or loops off of Monarch Pass and the Continental Divide Trail. Also see comments regarding NFST 1412.
10. NFSR 234. - This route is the Monarch Ski Area Parking Lot, this remains important to facilitating access to the Monarch Ski Area
 11. NFSR 235. - This route leads to Boss Lake, which is a very popular route for many OHV users including jeeps, UTVs, ATVs, motorcycles and non-motorized users as well. Many users utilize this route to access Boss Lake for fishing, camping, and hunting. We would support conversion of this route to a Full Size Trail.
 12. NFSR 273. -This route accesses the very popular hiking trail in Raspberry Gulch. Other uses include dispersed camping, mountain biking, hunting and fishing access. We would support conversion of this route to a Full Size Trail.
 13. NFSRs 279 & 348. - This route provides access to private land and mining claims and provides a challenging route for many OHV's and Jeep users. Hunters also find this route valuable for their access. We would support conversion of these routes to Full Size Trails.
 14. NFSR 101.A. - This route provides access to dispersed camping and is often used during hunting season. We would support conversion of this route to a Full Size Trail.
 15. NFSRs 180.A & 180.B. - These routes make a loop. The routes are moderately difficult and are used by UTV's, ATV's, jeeps, motorcycles, equestrians and mountain bikes. We would support conversion of these routes to Full Size Trails.
 16. NFSR 181.A. - This route provides access to a popular landmark called "The Crater" and is used by almost every user group. We would support conversion of this route to a Full Size Trail.
 17. NFSR183.A. - This route leads the public to stunning views of the Upper Arkansas Valley. Like NFSR 181.A this route provides access for all user groups. We would support conversion of this route to a Full Size Trail.

18. NFSR's 200.D, 202.D. – Although this road is a short Dead End, it remains a very popular, flat and easily accessible dispersed camping spot used by hunters, anglers, OHV users, mountain bikes, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
19. NFSR's 200.E, 200.F, 203.B, 203.C, 204.B, 204.C, 204.D, 204.E, 212.A, 212.B, 222.A. - Short routes that provide access to dispersed camping sites popular with multiple user groups including; hunters, anglers, OHV, mountain bikers, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
20. NFSRs 201.A, 201.AA, 201 CA, 201.CB. - Short routes that provide much need access to dispersed camping sites. All near the historic town site of Shirley, which is an extremely popular multi use recreation Trail Head. Users of this area include all groups including hunters, anglers, OHV, mountain bikers, hikers, equestrians and campers. The proximity to this historic town site along with the former Denver and Rio Grande Western Railroad's Marshall Pass roadbed and the access that is provided from this area to many popular trails and roads makes this area and the associated trails vitally important to all forms of recreation. We would support conversion of these routes to Full Size Trails. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.
21. NFSR's 214.A & 214.AA. - This route provides access to a small tributary stream of Pass Creek and access to the dispersed camping route of 214.AA. This route provides access for all user groups. We would support conversion of these routes to Full Size Trails. In addition, NFST 1411 is not specifically listed on the lawsuit, but is a treasured trail for its difficult nature.
22. NFSR's 214.F, 225.D, 225.E, 228.A, 344.H, 344.I, 365.B, 365.C, 373.B, 373.C, 375.AA. – Provides access to dispersed camping sites popular with multiple user groups. We would support conversion of these routes to Full Size Trails.
23. NFSR 237.B. - Provides access to dispersed camping sites with easy access from NFSR 237 popular with multiple user groups. We would support conversion of this route to a Full Size Trail.

24. NFSR's 240.F & 240.G. - These two routes provide access to dispersed camping sites along the very popular NFSR 240 and to North Fork Reservoir. This area remains popular with multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
25. NFSR 250.AA. - Enables access to dispersed camping in close proximity to the popular Mt. Shavano Trail Head. This area has multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of this route to a Full Size Trail.
26. NFSR 250.B. - This short route provides additional access to Squaw Creek and we would support conversion of this route to a Full Size Trail.
27. NFSR's 267.B, 267.C, 267.D, 267.E, & 267.F. - These routes all allow access to dispersed camping along the very popular NFSR 267 (Tin Cup Pass.) In addition, NFST 1436 currently has no loop opportunities. We request the Forest look for opportunities to create a loop in this area, such as from NFSR 344 to Tincup, or by extending NFSR 348 to CR 126.
28. NFSR 272.B. - This route makes a loop and is in close proximity to the Brown's Creek Trail Head. Dispersed camping opportunities exist along this route and are used by multiple user groups. We would support conversion of this route to a Full Size Trail.
29. NFSR's 272.E, 272.F, 272.G & 274.B. - These routes provide access to dispersed camping in close proximity to the very popular Browns Creek and Raspberry Gulch Trail Heads. This area is very popular with multiple user groups including hunters, anglers, UTV's, ATV's, mountain bikes, motorcycles, hikers, equestrians and campers. We would support conversion of these routes to Full Size Trails.
30. NFSR 278.C. - The route makes a good connector/loop with NFSR's 278.A & 278.B. Popular with multiple user groups. We would support conversion of this route to a Full Size Trail.
31. NFSR's 308.B2, 308.E, 308.F, 308.G, 315.A, 315.B, 315.C, 315.D, 376.AA, 376.AB, 376.AC, 376.D, 376.E, 376.G, 376.H, & 376.I. - These routes allow access to

dispersed camping sites in close proximity to the 4 Mile Recreation Area, a designated OHV area, but also popular with multiple user groups. We would support conversion of these routes to Full Size Trails. Additional designated parking and dispersed camping areas would be beneficial to recreational uses in this area.

32. Near the 4 Mile Recreation Area is a designated trail Open to Motorcycles Only (NFST 1425, AKA Triad Ridge). This trail is a wonderful recreational asset but it should be noted that a motorcycle rider with average skill, is able to traverse the entire trail in a very short amount of time (e.g., less than 30 minutes). We suggest that additional singletrack opportunities be provided in this area to develop a valuable, enhanced and satisfying recreational experience. Expansion of the recreational opportunity for motorcycles could be accomplished rather effortlessly through the adoption of historic “non-system” trails in the area with select modifications (e.g., re-routes, maintenance, etc.) to ensure an enduring and sustainable system of motorcycle trails.

Examples of routes that should be considered include a connection between NFSR 1434 to NFSR 185D, from NFSR 185 to NFSR 187, from NFSR 185D to NFSR 300. Several example maps are attached, however, this is not an exhaustive list of routes that should be considered in this area.

33. NFSR 311.D. - This short route provides access to Seven Mile Creek and we would support conversion of this route to a Full Size Trail.
34. NFSR 322.A. - This route is an extension of a route that accesses private land and/or a mining claim/radio/cell towers.
35. NFST 1412 (AKA Greens Creek). - This trail is the prime remaining motorized single track on the east side of the Continental Divide Trail within the Salida Ranger District. Trail 1412 provides an important and vital access to the Crest Trail and access to the historic town site of Sargents and the surrounding area’s trail system. The trail provides relief from the Crest Trail during high use times for motorized single-track users and offers loops from both Monarch and Marshall Passes. The Cumulative effects of closing Greens Creek to motorized

use would fall primarily to the Crest, by forcing motorized users to run back and forth on it.

We would also offer that an opportunity exists to provide a loop opportunity by connecting NFSR 225 to the Crest Trail. This would provide a loop with Trail 1412. We understand this connection would require some effort to complete but should be a consideration for future planning to enhance recreational opportunities within the District.

36. In addition, we believe that the Forest should open at least one of the following additional routes to create a motorized loop with the Crest trail:

- a. Silver Creek Trail (NFST 1407): Allowing motorized travel on this trail would create a logical loop connection to the Rainbow Trail, and improve trail condition by bringing OHV funds to bear on maintenance.
- b. Starvation Creek Trail (NFST 1408): Allowing motorized travel on this trail would take singletrack traffic off Poncha Creek road, improving safety and bringing OHV funds to bear on maintenance.
- c. South Fooses Creek (NFST 1776): This trail was traditionally motorized singletrack and reopening it to motorized use would enable loops that would diminish impact on the Crest. Further, the condition of the trail has deteriorated since motorized traffic has been removed, due to a lack of maintenance.

37. NFSR 204 to NFSR 210 connection- there is a user defined trail that connects these routes and would be very useful in creating loops and lessening impact on the Crest trail.

38. Finally, we believe the Travel Management effort should acknowledge the inevitable proliferation of electric assisted bicycles. Currently, these bicycles fall into a grey area depending on the amount of power they produce, which will be impossible to have effective enforcement for. We believe that within the timeline of the current Travel Management effort, e-bikes may have a large impact on the presence of combustion powered motorcycles, and the travel

management plan should create a trail system that will work for all types of powered vehicles.

In summary, the CCMR is supportive of the Forest's efforts to create a sustainable multiple use travel plan that meets demands, both human and natural, in the years and decades ahead. We believe this opportunity is an outstanding chance to make a more usable trail system, and we look forward to doing our part in helping to educate users, maintain trail, and promote safe and responsible OHV recreation within the Forest.

Please direct any correspondence and questions to Chad Hixon, 719-221-8329, centralcoloradomountainriders@gmail.com, or Ned Suesse, 719-338-4077, ned@nedsuesse.com.

Sincerely,

Chad Hixon
President, Central Colorado Mountain Riders

Attachments: 5 map files

cc: Jim Pitts, Salida District Ranger