

December 4, 2020

Rocky Mountain Regional Office  
Attn: Reviewing Officer  
P.O. Box 18980  
Golden, CO 80402

Sent via U.S. mail and electronic mail: [r02admin-review@usda.gov](mailto:r02admin-review@usda.gov).

**Objections to DRAFT Record of Decision for the Pike and San Isabel National Forests Motorized Travel Management (MVUM) Analysis and Final Environmental Impact Statement (FEIS)**

Dear Reviewing Officer:

The following objections are being submitted regarding the Record of Decision (ROD) for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSINF) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS). We are submitting these objections on behalf of the Trails Preservation Alliance (TPA) and the Colorado Off-Highway Vehicle Coalition (COHVCO). The TPA and COHVCO have previously submitted comments relative to this project's Draft EIS and Scoping comments on November 1, 2019. The TPA and COHVCO recognize and appreciate the substantial amount of work and effort that it has taken to accomplish this major milestone in the project.

In 2011, both the TPA and COHVCO joined the Pike and San Isabel National Forests as Intervenor Defendants in the lawsuit that began the MVUM Analysis Project. The TPA and COHVCO have both invested substantial financial resources since 2011 in the interest of maintaining access to the PSINF and United States Forest Service (USFS) lands. The TPA is an advocacy organization created to be a viable partner to public lands managers, working with the 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. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle

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(OHV), snowmobile and 4WD users in Colorado seeking to represent, assist, educate, and empower all motorized recreationists in the protection and promotion of multiple-use and 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. The TPA and COHVCO are referred to collectively in this correspondence as "The Organizations." The Organizations offer the following comments, concerns and formal objections regarding the project and the recently released Draft ROD and FEIS.

We believe it is appropriate and imperative to once again point out that the current Forest Plan for the PSINF is critically out of date, lacks the framework for current land management and inadequately provides relevant management guidance for the growing needs and demand for multiple-use and motorized recreation, especially OHV recreational opportunities. The current Forest Plan did not foresee, and therefore does not account for, changes in technology such as e-bikes and a escalating growth of UTV/side-by-sides. Whereas the existing Forest Plan no longer contains "desired conditions" that are meaningful and realistic given the growth and expansion of the Front Range communities that border the PSINF and the associated needs of the citizens relying upon, using and recreating on the Forest. The Organizations would offer that subsequent planning documents, namely the **South Rampart Travel Management Plan (SRTMP)** prepared in 2011 more accurately reflects current and ongoing conditions and incorporates relevant and attainable desired conditions in addition to receiving substantial public support from affected user groups. One of the primary purposes of the SRMTP was to determine which motorized roads and trails in the South Rampart Planning Area of the PSINF were necessary to provide a diverse, functional and sustainable transportation system (similar to the purpose of this action). The SRTMP also sought to balance resource protection, public safety, current and anticipated future recreational use demands, and public and administrative access needs. Key issues that were already developed in the SRTMP and remain relevant to this action/project included<sup>1</sup>:

- a. Trail sustainability and impacts of trail based recreation and dispersed camping to forest resources (i.e., soils, hydrology, wildlife, & vegetation).

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<sup>1</sup> Environmental Assessment, South Rampart Travel Management Plan (SRTMP), USDA Forest Service, Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands, August 2011, pg. 1-7, 2-1

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- b. Inadequate opportunities for trail-based recreation in the planning area.
- c. Minimization of motorized/non-motorized user group conflicts.
- d. Consistency of proposed uses with adjacent land uses and special management areas, including roadless areas and the Manitou Experimental Forest.

“Under [NEPA], an injury results not from the action authorized by the agency’s decision, but from the agency’s *uninformed* decision-making.” *Comm. to Save Rio Hondo v. Lucero*, 102 F.3d 445, 452 (10th Cir. 1996). Such is clearly the case here.

## **OBJECTION 1:**

Previously submitted comment: *We acknowledge that the PSINF has been challenged to adequately managing multiple-use/motorized recreation and the ever-increasing growth associated with the diverse forms of multiple-use recreation. However, we feel much of this stems from a rising need and demand for multiple-use recreational opportunities on public lands in general and especially near urbanized areas along the Front Range of Colorado. Several of the Ranger Districts within the PSINF are unique in that they are within close proximity of Colorado Springs, the second largest city in Colorado with a population well over 400,000. As the State of Colorado’s population has grown, so have the sales of Off-Highway Vehicles (OHV’s), bicycles, hiking equipment, camping units and other forms of outdoor recreation increasing the demand for recreation sites within the PSINF. It is estimated that approximately 8.5% of the households in Colorado participate in OHV recreation and that between 2000 and 2014, resident OHV registrations have increased by 119% with Non-resident permits increasing by over 1,607%.<sup>2</sup> The need and demand for OHV recreational opportunities are growing and will continue to grow, thereby the Organizations would insist that the PSINF should and must consider roads and trails as critical infrastructure for recreation.*

**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) fails to provide a system of roads, routes and trails that meets the current and more specifically the future needs and desires of the public. Alternative C notably reduces the miles of roads, routes and trails available for recreational

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<sup>2</sup> Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

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access and therefore forces recreational uses onto fewer roads, routes and trails causing increased density of use, increasing impacts to a reduced number of recreational opportunities and densities of use rather than dispersing use and thereby reducing impacts and conflicts. This becomes especially troublesome given the current rates of increasing use as documented above and an expected continued growth into the future. Alternative C must include more new and expanded routes and trails as proposed in Alternative D (e.g. including the additional routes, open areas and recreational opportunities developed by the SRTMP) to even begin to meet the existing demand and to protect Forest Resources from the rapidly expanding growth in recreational needs and demands in the future. We are compelled to once again question “why” all of the extensive work, expenditure of public agency funds, analysis and conclusions completed in support of the South Rampart Travel Management Plan (SRTMP) prepared in 2011 continue to be ignored and set aside by this project and action. One of the primary purposes of the SRMTP was to extensively engage with the public to determine which motorized roads and trails in the South Rampart Planning Area of the PSINF were necessary to provide a diverse, functional and sustainable transportation system (similar to the purpose of this action) yet absolutely little to none of that work or recommendations have been included by this project and none of the beneficial proposed new routes incorporated into this action.

Similarly, we must strongly object to the lack of proposed new Parking Areas within the Pikes Peak Ranger District (PPRD). Of the 102 proposed new parking areas, **only 2 new parking areas are proposed within the jurisdiction of the PPRD** which is simply unconscionable given the high recreational public use in the PPRD and the needs and demands for safe, sustainable, designated parking areas to reduce resource impacts from the current unmanaged and undesignated parking throughout the Forest. We must insist that all of the remaining 100 proposed parking areas that have already been analyzed in Alternative D be included in the final ROD as modifications to the Preferred Alternative to address the current unsustainable and unmanageable lack of parking throughout the PPRD. Finally providing fewer opportunities for motor vehicle use and access for recreation will have a significant negative effect to ALL users and visitors of the Forest. Below is a comparison of the adoption and acceptance rate of the 291 individual proposed new parking areas in the PSINF by Ranger District.

**Table 1**

| Ranger District | Number of Proposed New Parking Areas | Number of Adopted/Accepted Proposed New Parking Areas |
|-----------------|--------------------------------------|---|
| Leadville       | 7                                    | 7/100%  |
| Pikes Peak      | 102                                  | 2/1.9%  |
| Salida          | 134                                  | 32/24%  |
| San Carlos      | 44                                   | 42/95%  |
| South Park      | 2                                    | 1/50%   |
| South Platte    | 2                                    | 1/50%   |

We contend that the following additional routes that have already been analyzed in Alternative D should be included in the final ROD as modifications to the Preferred Alternative in order to better meet current needs and desires, to improve the dispersal and distribution of recreational uses and better provide motorized, multiple-use recreational opportunities for the future:

- Add and designate the following new routes analyzed in Alternative D; PA 42, 43, 44, 54 in the Rainbow Falls area of the PPRD as Open to Motorcycles.
- Add and designate New Trail 2, analyzed in Alternative D, to connect NFSRs 340.B & 343.B with NFSR 357.
- Add and designate the following new routes analyzed in Alternative D; PA 10, 13, 14, 16, 17, 28 in the Gold Camp Road area of the PPRD as Open to Motorcycles.
- Add and designate the following new route analyzed in Alternative D; PA 7 in the Gold Camp Road area of the PPRD as Open to all vehicles.

Without such modifications, this violates NEPA, 42 U.S.C. § 4321, *et seq.*, by failing to take the required hard look at direct, indirect, and cumulative impacts resulting from these issues.

**OBJECTION 2:**

Previously submitted comment: Alternative C, as released for public review and comment in the DEIS, has a number of roads that are being considered/planned to be converted to trails, which the Organizations enthusiastically support. However, this alternative also includes 330 additional miles of road segments that should also be converted to trails. Using the Minimum

*Road System (MRS) Screening Criteria as described in Section 2.3.1 of the DEIS, and using the individual and overall ratings from the PSI Travel Analysis Reports (TARs), the Organizations have identified an additional 239 individual road segments as ideal candidates for converting to trails. According to the DEIS, the PSI staff reviewed these segments and decided to deviate from their own screening process (Section 2.3.1, page 2-6). The document states that these changes “remain consistent with the aim and emphasis of the alternative”, but they (i.e. PSI staff) have not provided a revised Travel Analysis Process (TAP) or any other documentation to support their claims; so it appears to the Organizations that they have essentially ignored and contradicted the Travel Analysis Process (TAP) results when they are required by USFS policy to use a science-based travel analysis process to inform their decisions. The PSI staff must make their decisions based on a science-based process rather than on their own subjective preferences and biases, so the Organizations must insist that this issue be addressed and fixed and that the majority of the 239 segments be included for conversion to trails. The Organizations believe that the conversion of these roads to trails will result in an improved and safer minimum road system, and will better meet the stated purpose and need for this project. The following table identifies, by Ranger District, the number of the 239 individual road segments that should be converted to trails when preparing the Preferred Alternative in the FEIS.*

**Table 22**

| Ranger District | Number of Road Segments to be “Reconsidered” for Conversion to Trails |
|-----------------|---|
| Leadville       | 17  |
| Pikes Peak      | 19  |
| Salida          | 37  |
| San Carlos      | 51  |
| South Park      | 100   |
| South Platte    | 15  |

**Basis of Objection:** In the FEIS, page 2-6, it is stated that the PSINF staff “*reviewed on a site-by-site basis the changes to route status indicated by the MRS screening process.*” The document is claiming that the PSINF staff made changes to route status decisions in Alternative C “*to be sure that any status changes would still ensure access to private parcels and facilities,*

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*correct errors in mapping, and address site-specific constraints.*” In essence, the staff rejected their own Travel Analysis Process (TAP) results and ignored MRS Screening Criteria rules, and made unscientific and **biased** travel management decisions that contradicted the science-based results from their own Travel Analysis Process. Instead of following the Forest Service directives for updating/amending a TAP, the staff short-circuited that process and disenfranchised the public when they substituted a staff review process instead of following the standard procedures for redoing and updating the TAP. The PSINF’s own Forest Transportation Planner informed and advised the PSINF leadership that the correct process for making changes to route status decisions that contradict TAP results would be to first update the current TAP with a TAP revision or TAP amendment so that their desired changes would be properly analyzed in a science-based analysis, with public involvement. PSINF leadership rejected the advice of their own engineering expert and proceeded with their staff review process without the engineering expert’s professional assistance. It is abundantly clear that this staff review process violated forest service policy and procedures, and therefore the unacceptable route status decisions resulting from this staff review process need to be corrected.

Forest Service regulations require that TAP results **inform** travel management decisions (FSM 7700 Chapter 7710, Section 7712.3 Paragraph 3). These regulations clearly state that proposed travel management decisions **MUST** be informed by travel analysis (FSM 7712.4). However, in this case, the PSINF staff made subjective travel management decisions for hundreds of road segments that contradicted their TAP results without documentation or adequate justification. An informal and undocumented review by the PSINF staff falls far short of a properly done TAP or TAP amendment, and therefore cannot be accepted to justify subjective preferences and biased changes made to route status decisions. This comment/objection was submitted to the Forest Service during the DEIS comment period in November 2019, but nothing was done to address this concern prior to the release of the FEIS.

An analysis of the final spreadsheet for Alternative C (included in Appendix A of this document) **reveals 218 individual road segments that were unacceptably changed by the PSINF staff**. Instead of using the TAP to inform these changes, the PSINF staff ignored the TAP results and made subjective and biased changes. All of these segments, based on the science-based TAP results and MRS Screening Criteria Rules, should be converted to trails open to all vehicles. The total length for these 218 segments amounts to **302.82 miles**. Attached is a spreadsheet in

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Appendix A that shows each Alternative C individual road segment that needs to be corrected to show a conversion from a road to a motorized trail.

The conversion of these roads to motorized trails will result in an improved and safer minimum road system, and will better meet the stated purpose and need for this project.

### **Additional TAP Use Objections:**

The TAP Addenda were prepared in 2014-2015 for each of the six individual Ranger Districts. These six TAP Addenda were prepared for the 2009 Pike and San Isabel Forest-wide Travel Analysis Process (2009 PSI TAP). Unfortunately, the public involvement process during the preparation of the TAP Addendums was not inclusive and did not receive adequate public input. Supporting this position is the fact that during the formal public scoping comment period for the PSI Travel Management Project, 1280 submittals were made from 1326 individual commenters (*from the general public, nonprofit organizations, businesses, and government agencies*). In comparison during the TAP Addendum process, a total of 19 commenters provided comments for all six Ranger Districts. Below is a summary of the number of comment submittals that were provided for each respective Ranger District. In reviewing the comments, many comments are the same or very similar between Ranger Districts and may often be attributed to the Quite Use Coalition (QUC) or similar constituents. Only one TAP Addendum specially identifies the commenter's affiliation (San Carlos RD, QUC), however, similarities and consistencies are apparent between those particular TAP Addendum's comments and the others.

- a. Leadville Ranger District – 4 Commenters
- b. Pikes Peak Ranger District – 1 Commenter
- c. Salida Ranger District – 9 Commenters
- d. San Carlos Ranger District – 3 Commenters
- e. South Park Ranger District – 1 Commenter
- f. South Platte Ranger District – 1 Commenter

In comparing the order of magnitude between the number of commenters for the PSI Travel Management Project (1280) and the TAP Addendum process (19), it is obvious that the public was not similarly or adequately engaged and the notification of the public was obviously lacking effectiveness.

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Any decision that relies upon data or information originating from the TAP Addenda should be questioned and the resulting consequences of the inadequacy of the TAP Addendum's public process.

By the United States Forest Service's (USFS) definition contained in the Background Section of the Pikes Peak Ranger District's TAP Addendum:

*“Travel analysis is an integrated ecological, social, and economic science-based approach to transportation planning that addresses existing and future road and motorized trail management options. A complete science-based travel analysis will inform management decisions about the benefits and risks of: constructing new routes in unroaded areas; relocating, stabilizing, changing the standards of, or decommissioning unneeded routes; access issues; **and increasing, reducing, or discontinuing route maintenance.** An appropriate balance between the benefits of access to National Forest System lands and the risks of route-associated effects to ecosystems is necessary to develop an optimum transportation system. **One of the top priorities of the U.S. Forest Service** (Forest Service) is to provide road and motorized trail systems that are safe for the public, **responsive to public needs**, environmentally sound, affordable, and efficient to manage. Completing the TAP is a key step to meeting this objective.*

*The TAP is designed to **define route-related issues important to the public** and to forest managers. It provides a set of analytical questions to be used in fitting analysis techniques to individual situations. The detail of the analysis should be appropriate to the intensity of the issues addressed. Travel analysis provides information to line officers by disclosing the important issues and effects relevant to route management proposals. Any actual route management decision made as a result of this TAP must be determined in a National Environmental Policy Act (NEPA) document.*

The bold and underlined text was made to highlight the importance the USFS has placed on the public's needs and input during the TAP Addenda process. Based upon the statistics provide above, this process **did not** include an adequate response or participation from the public and lacked key input and feedback from potentially affected land owners, municipalities, counties, utilities, recreationalists in general and especially the motorized recreational community.

Per the Pikes Peak Ranger District's TAP Addendum, the objectives of the Analysis were stated as:

*The primary objective of this travel analysis is to provide the Pike National Forest, Pikes Peak Ranger District, managers with an appropriate level of information to manage and maintain a*

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*road and motorized trail system that is safe **and responsive to public** and agency needs, affordable and efficiently managed, environmentally sound, and in balance with available funding. This travel analysis develops, organizes, and displays information about Operational Maintenance Level 1 & 2 National Forest System Roads (NFSR), as well as combining that data with updated Operational Maintenance Level 3-5 data from the 2009 PSI TAP to create a Travel Analysis Report (TAR) and Map. This TAP analyzes all existing system roads as identified on the current Pikes Peak Ranger District Motor Vehicle Use Map (MVUM) as well as administrative and maintenance level 1 roads.*

Once again, there is stated language describing how an objective of the process is to **be responsive to the public**. With only a single commenter providing comments relating to the Pikes Peak Ranger District's TAP Addendum, it is obvious that the public was not engaged in this process, calling into question how the USFS' Team could adequately evaluate or understand the needs and desires of the public with only a single comment.

Another objective stated for this travel analysis process included: *To identify opportunities and provide recommendations for improving the Forest transportation system*

Again, a primary resource necessary to fully understand how a transportation system can be improved is through gathering input from system users. As evidenced by the lack of public participation and input, it is logical to conclude that this objective of the travel analysis was simply not met.

The TAP process is likely to be biased and flawed. Per the Pikes Peak Ranger District's TAP Addendum, the TAP process was outlined as follows:

*A core team was assembled to define an analysis plan for the Pikes Peak Ranger District. The core team completed an initial rapid analysis of all routes using the criteria defined in the Forest-wide TAP. This rapid analysis was completed during a two-day workshop in which the team reviewed GIS data, INFRA data, and filled out a TAP Matrix spreadsheet. The core team collectively ranked each route based on the TAP criteria, which allowed for an iterative, collaborative, and rapid analysis process. While the core team members are not experts on each of the criteria, their substantial experience in the Ranger District allowed them to make an initial judgment on the route criteria. The draft TAP matrix table was then distributed to each ID team member for their detailed and specialized review of the analysis. Changes recommended by*

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*individual ID team members were incorporated and the TAP was redistributed to the entire ID team for a final review. This rapid analysis method was effective and allowed completion of the TAP with limited budget and time.*

By its own admission the process was done very quickly by staff that may have limited area-specific knowledge and experience. And in some cases (based on informal discussions with USFS staff) may not have even traveled or recently traveled on routes they were scoring and making very important judgments on. The results of the team's analysis for the myriad of individual routes (*total mileage of Maintenance Level 1, 2, 3, 4/5 roads: 427.68; The Pikes Peak Ranger District TAP Addendum did not address Motorized Trails*) within the Pikes Peak Ranger District, was an ultimate score based upon a individual route's perceived benefit (High or Low) and risk (High or Low). It is certainly conceivable that team members could score routes without personal knowledge of a particular route and also subject to that individual team member's personal bias. Once again, determining "benefit" without some sort of input from the users of a route (e.g., the public) leaves that determination of a route's benefit solely to the USFS team and would be based upon the Team's subjective personal opinions.

**The "recreational" benefit of the roads is likely no longer current or accurate as described in the TAP/TAP Addenda.** Since the TAP and TAP addendums were completed, the growth of UTV/Side-by-side use alone has grown substantially. Recent estimates show a record of 458,000 UTVs sold in the United States in 2018, up 5.9% from 2017 and a 95.3% gain from 2006<sup>3</sup>. Since a majority of UTV/Side-by-side exceeds the 50" width restriction for use on the USFS' OHV "trails", the UTV/Side-by-sides must depend upon the access to and use of USFS roads for recreation and use. Demand and use by UTV/Side-by-sides on USFS roads has undoubtedly increased (*perhaps by over 95% since 2006 based on unit sales*) since the TAP process was began and the assessments completed, and therefore roads that may have had "Low" recreational value in the past may well have and increased recreational value today. To use the TAP data and the associated conclusions that are nearly 10 years old to assess Recreational Value today, when there has been such a significant increase in the demand and use by UTV/Side-by-sides, would seem to call into question the accuracy of the TAP process, assessment and conclusions.

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<sup>3</sup> SEMA News- July 2019

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NEPA is to analyze how an action will affect the human environment. 42 U.S.C. § 4332(C).

The goals of NEPA are to be fulfilled through such measures as: (i) informed decision-making (40 C.F.R. § 1507.2; *see also* 40 C.F.R. § 1500.1), which is accomplished through preparation of an EIS (40 C.F.R. § 1502.9; 40 C.F.R. § 1502.1), professional and scientific integrity (40 C.F.R. § 1502.24), and full consideration of reasonable alternatives (40 C.F.R. § 1502.14); and (ii) public involvement, accomplished through notice, scoping, public comments and public meetings (40 C.F.R. § 1503.1; 40 C.F.R. § 1506.6; 40 C.F.R. § 1502.9(b)), and collaboration with cooperating agencies (40 C.F.R. § 1501.6). PSINF must adhere to the multiple use mandates from its authorizing statutes such as National Forest Management Act, 16 U.S.C. § 1600, *et seq.* Here, the agency decision has strayed far from such authority. As described above, there are significant issues in all these regards. Moreover PSINF has run afoul of the Data Quality Act (DQA), Pub.L. 106-554 and its implementing regulations. Among other things, the DQA requires agencies meet certain standards of quality, integrity and objectivity.

### **OBJECTION 3:**

Previously submitted comment: *The Organizations enthusiastically support the adding of new “Open Areas” (as proposed in Alternative D) as areas open to motor vehicles to Alternative C. The Organizations specifically and strongly support adding Open Areas in the Rainbow Falls area as previously proposed in the South Rampart Travel Management Plan (SRTMP), any and all areas forest wide that would be useable by trials motorcycles for trials training and riding, and any areas designated for new rider and or operator training and practice (e.g. Kids riding areas, skills development, challenge areas, etc.) such as adjacent to the Rule Ridge Trailhead on NFSR 357 [in the Pikes Peak RD]. Per the Recreation Report, the Organizations support the following proposed Areas Open to Motor Vehicles being added to the Preferred Alternative:*

**Table 33**

| Ranger District | Proposed Areas Open to Motor Vehicles |
|-----------------|---------------------------------------|
| South Park      | PA 4, PA 29                           |
| San Carlos      | PA 9, PA 15                           |
| Pikes Peak      | PA 32, PA 33                          |

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**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) failed to include ANY of the much needed and beneficial “Open Areas” proposed in Alternative D and supported by public comments, especially the two “Open Areas” in the Pikes Peak RD. Chapter 1 of the FEIS acknowledges and recognizes the public’s desire and need for “open areas for specialized motor vehicle use, such as areas for trials motorcycle”, yet of all of the proposed areas or locations identified for possible special motor vehicle use, not even a single area was included with the Preferred Alternative. All of the benefits realized from designated open areas as enumerated above in our previous comment and all of the extensive work and analysis completed in support of the South Rampart Travel Management Plan (SRTMP) prepared in 2011, appear to have been completely disregarded or ignored. Designation of open riding areas or areas for specialized motor vehicle use, will in fact reduce resource damage and improve sustainability of the transportation network by designating areas where open uses can be managed, regulated, controlled and impacts minimized. As currently proposed with NO designated open riding areas or areas for specialized motor vehicle use, those forest visitors that are seeking or requiring that particular recreational experience will be forced to find their own areas distributing the use in an unmanaged manner instead of in focused designated area(s) that can be properly managed and regulated with boundaries, informational signs and other control methods and means.

We contend that the inclusion of the six areas open to Motor Vehicles as proposed in Alternative D must be re-considered and one or more areas included in the final ROD as modifications to the Preferred Alternative, especially to provide non “special use” permitted (i.e. for specific competitive trials events) recreational opportunities for trials motorcycles. **The TPA is willing to assist the USFS in the development of Management Strategies and Techniques for the use of open areas specifically by trials motorcycles.**

Review of an agency’s decision is deferential if the agency’s exercise of discretion is truly informed. *Utah Shared Access Alliance v. United States Forest Service*, 288 F.3d 1205, 1213 (10th Cir. 2002). However, if the record shows that the agency prejudged the issues, then deference to the agency’s decision is diminished. *Davis v. Mineta*, 302 F.3d 1104, 1112 (10<sup>th</sup> Cir. 2002). Such is the case here.

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## **OBJECTION 4:**

Previously submitted comment: *The Organizations contend that NFSR 322.A in the Pikes Peak RD should have been included and designated on the original MVUM and that the requirements of 36 CFR, Part 212 have not been followed, keeping this road closed to public access. We feel that NFSR 322.A was closed improperly and needs to be re-opened immediately and placed onto the Pike Peak RD MVUM. This route provides an important connection between NFSR 320 (aka Mount Herman Rd.) and NFSR 322, which synergistically provides high quality recreational loop opportunities. NFSR 322.A could also be a candidate for conversion to a “trail open to all vehicles” or “trail open to motorcycles” to discourage causal use and access by low clearance vehicles. We realize NFSR 322.A was closed for alleged resource damage, but mitigation efforts have been successful in this area and the route should be re-opened to public access. NFSR 322.A provides a sought after opportunity to connect with and to enhance combined loop opportunities with the NFSR’s 324, 325 and the NFSR 323 area, NFSR 322 and NFSR 320 and the NFSR 315, 314 and 321 areas. We would also request consideration of connections between NFSR 322 and NFSR 933 (<1 mile) and NFSR 933 to NFSR 323 (<1 mile) to provide enhanced looped opportunities.*

**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) perpetuates and continues the prejudice of the improper closing of NFSR 322.A instigated in the past. Per the Purpose and Need of this project “... to balance the current and future recreational desires...” continued closure of NFSR 322.A eliminates a much desired route that has been historically used for decades, connection between NFSRs 322 and 320 to distribute traffic, reduce traffic density, provided recreational loops, disperse use and meet the current and recreational desires for access to the Upper Monument Creek area. NFSR 322. A received a **Road Benefit Rating of HIGH for recreational use** in the Pikes Peak RD’s Travel Analysis Process Report Addendum (TAP), finalized in August 2014 and was assigned a total “Benefit Score of “4” which included benefits for Fuels, Fire and Timber management. The recreational benefit and desirability of NFSR 322.A for the connection that it provides between other routes has remained HIGH despite the years long temporary closure of this popular route. We acknowledge that the TAP identified mitigation measures were needed for this road and it cannot be overlooked that the Pikes Peak RD had even received CPW OHV grant funds to address the mitigation needs for this road. However, the years of temporary closure that have wrongfully endured due to the languishing of this PSINF’s

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Public Motor Vehicle Use Environmental Impact Statement project, most of the needed mitigation has indeed taken place and occurred through natural process. Our objection must also include the fact that NFSR 322.A was closed and has essentially been improperly “Decommissioned” with “pre-decisional” prejudice prior to the decision for this project.

Below is a map illustrating the existence and condition (i.e., “Dirt Road” not a “Primitive Road”) of NFSR 322.A from the Pike National Forest’s TRAVEL MAP published and released for public use in 1981.



Figure 1 - 1981 Map Depicting NFSR 322.A

We contend that due to the HIGH recreational benefits and unique connectivity benefits of NFSR 322.A between NFSRs 322 and 320 and the associated benefits for Fuels, Fire and Timber management, this road must be removed from the list of routes to be decommissioned and re-opened to public access and designated as a Trail Open to All Vehicles as was analyzed in Alternative D. That NFSR 322.A should include a hardened stream crossing to protect water resources, a minor re-route as necessary to avoid any sensitive riparian areas and be included

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included in the final ROD as a modification to the Preferred Alternative. There are three primary questions relative to NEPA: What is the purpose of the proposal? Given the purpose, what are reasonable alternatives? To what extent should the agency explore each particular alternative? Here, the proposed action runs afoul of the purpose and need, and thus, is inconsistent with NEPA and the Administrative Procedures Act (APA). *See* 5 U.S.C. §§ 551 *et seq.*

**OBJECTION 5:**

Previously submitted comment: *The roads and trails in **Hackett, Longwater and Metberry Gulches along with Coral Creek (AKA The Wildcat Canyon Area)** have long been enjoyed by enthusiasts and recreationists and were a longtime favorite for access to the South Platte River. **The Organizations would support conversion of USFS roads in this area to “trails open to all vehicles”** (specifically we request that NFSRs 221, 220.A, 220.B and NFSR 540 be re-opened and converted to trails open to all vehicles along with the approximate 1 mile segment of NFSR 205 in Douglas County be converted to a trails open to all vehicles). Since the devastation of the Hayman Fire, many organizations, clubs, individuals and others have partnered and worked diligently together to help restore this area with the hopes of one day seeing access to the area restored as it was before the fire. The partnership between the local County Governments (i.e., Teller County), the USFS, State agencies and the recreational users groups may all be looked to as a “good example” of folks working and cooperating together to restore recreational opportunities for the public. Restoring this access, similar to what was available before the Hayman Fire, will also help restore the recreational opportunities that existed in the area and the related economic benefits to the surrounding communities. All of these communities will certainly realize an economic benefit once access is restored to this area and across the South Platte River. Rather than allowing the fire to permanently take away a treasured resource from public use, the Organizations strongly support the reopening of these routes (e.g. as trails open to all vehicles) between all of the adjacent Ranger Districts and facilitating connections and loops along the east side of the South Platte River (e.g., connections between Longwater and Hackett Gulches). Deliberate efforts need to be made to provide environmentally friendly and sustainable crossings across the South Platte River. General and broad statements and accusations that the river cannot be crossed without impacts should not be used as justification to restrict access. Technical, engineered solutions to cross the river are indeed possible and must be explored, planned, designed and implemented.*

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**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) failed to properly assess the recreational benefits and follow the requirements of the NEPA process to fairly and adequately assess the benefits and risks of the roads and trails in Hackett, Longwater and Metberry Gulches along with Coral Creek (AKA The Wildcat Canyon Area). Without properly fulfilling the requirements of the NEPA process, the PSINF decided in 2015 that NFSRs 205, 220, 220.A, 220.B, 221 and 540 were not needed as part of the minimum road system (MRS) based on alleged adverse environmental impacts and an incorrect assertion that there was “low” public benefit from motorized recreation on these specific roads. That the PSINF never properly considered the possible mitigation efforts that were available to address any of the alleged adverse environmental impacts of motorized recreation on the six NFSRs in the Wildcat Canyon area. That the PSINF then carried those arbitrary decisions forward into its current proposed decision to select Alternative C in the PSI Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) without any further review, NEPA analysis or valid public comment analysis which clearly is a violation of agency regulations. This violates the requirements in 36 CFR 212.5(b) that the PSINF use a science-based roads analysis to prepare the MRS.

Additionally, in the Travel Analysis Process Reports (TAP), the PSINF explicitly stated, “*any actual route management decision made as a result of this TAP must be determined in a National Environmental Policy Act (NEPA) document.*” In the 2015 South Park Ranger District Travel Analysis Process Report Addendum, page 2-6 states “*During future travel planning NEPA compliance actions, the responsible official/line officer will use this data to inform that process and to help identify a minimum road system (MSR) that will reflect long term funding expectations*”. In 2017, the PSINF then used the TAP Reports to prepare the MRS prior to any NEPA process having been completed. (FEIS, page 2-5, “*The PSI’s TMIDT developed the process below to screen roads under each of the four overall TAP ratings, thereby identifying the MRS*”). The data from the TAP Reports was, in the case of the six NFSRs in the Wildcat Canyon area the only material the agency considered when preparing the MRS.

The PSINF asserted in the South Park Ranger District’s Travel Analysis Process Report Addendum, that the six NFSRs in the Wildcat Canyon area had “low” public recreational benefit **because no motorized recreation was occurring on the roads at that time**, even though **the lack of motorized recreation was due solely to the fact that the PSINF had closed the roads**

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**to recreational use and the PSINF was aware that the roads were very important to motorized recreation users who had opposed that closure.** See South Park Ranger District Travel Analysis Process Report Addendum pages 6-1—6-2 and FEIS page 2-5.

Subsequently when the PSINF conducted a NEPA process for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS), the PSINF did not review the data from the TAP Reports as part of that NEPA process but merely adopted the findings from the TAP Reports. FEIS page 2-6 (“*Of the roads subject to the MRS screening process, any specific road recommendation in the [TAP Report] was adopted, regardless of the screening process and criteria described below*”).<sup>4</sup>

Therefore, the agency violated regulations, which requires the PSINF to incorporate a science-based roads analysis, in determining the MRS. Moreover, this amounts to an irreversible, irretrievable commitment of resources in violation of NEPA.

#### **OBJECTION 6:**

**Previously submitted comment:** *The Organizations are obliged to point out that NFSR 302.A (Pikes Peak RD) is being shown on Alternative C and other alternatives as being “Decommissioned”; that this route has been in fact already been decommissioned and was closed improperly and with “pre-decisional” prejudice prior to this project. The Organizations contend that NFSR 302 should have been left open to public access and a connection made to NFSR 302 to provide enhanced public access and a looped opportunity in a popular recreational area.*

**Basis of objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) proposes to decommission NFSR 302.A and we object to this decision as this route has already in fact been physically decommissioned and was closed improperly and with “pre-decisional” prejudice prior to this project.

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<sup>4</sup>The agency reviewed on a site-by-site basis those roads where the MRS recommendation had been changed, but not for purposes of assessing environmental impacts. FEIS at pg. 2-5. The agency had not, however, changed the MRS recommendation for the six NFSRs at issue.

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We contend that NFSR 302.A should be removed from the list of routes to be decommissioned and re-opened to public access and a loop connection made to NFSR 302 to provide enhanced public access and a looped opportunity in a popular recreational area.

Under NEPA, the agency must “insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken.”40 C.F.R. § 1500.1(b). Last-minute, unilateral changes with no opportunity to review or comment is a clear violation of NEPA. 40 CFR § 1503.1; 40 C.F.R. § 1506.6; 40 C.F.R. § 1502.9(b).

## **OBJECTION 7:**

Previously submitted comment: *Regarding the stipulations for the consideration of **Seasonal Closures**, we provide the following comments:*

- a. *Recommend that the selection of a specific date(s) to implement any required closure period utilize the following criteria:*
  - i. *Minimization of the closure period to maximize availability of the routes and areas for recreational uses.*
  - ii. *Generally consistent and uniform closure dates to minimize confusion within the individual Ranger Districts and throughout the PSINF. Multiple dates will likely be more difficult to communicate to Forest visitors and more challenging to enforce. However, each seasonal closure must be individually analyzed.*
  - iii. *Natural route closure generally occurs during the winter season due to snow. Coincidence of the required closure periods with the winter season will help minimize impacts to multiple-use of the specified routes. Wherever possible, if the seasonal conditions on the ground are likely to represent an effective barrier to travel, the PSINF should avoid implementing seasonal closures that create confusion and create an unnecessary enforcement and financial burden.*
  - iv. *Seasonal closures that affect only motorized users (e.g. the proposed seasonal closure of NFSR 300, aka Rampart Range Road, Pikes Peak RD), are inconsistent with the best available science for protecting*

*habitat<sup>5</sup> and **seasonal closures must be made universal to all users, both motorized and non-motorized.***

- b. *The Organizations provide the following specific comments and modifications to current or proposed Seasonal Closures in the DEIS:*
- i. *Remove and eliminate the existing and proposed Seasonal Closure on Rampart Range Road, aka **NFSR 300** (Pikes Peak RD). There is no reasonable justification to close this road seasonally, no critical habitat to protect, wildlife issues, road surface issues, etc. Previously stated justification by the Pikes Peak RD to close this road seasonally can be accomplished through visitor education and enforcement.*
  - ii. *Remove the existing and proposed seasonal closure of **NFSR 376.A** (Pikes Peak RD).*
  - iii. *Remove the Seasonal Closure on **NFSR 185.D** (Salida RD) as the closure eliminates access to NFSRs 185.DA and 185.DB and curtails access to NFSR 1434.*
  - iv. *Remove the proposed permanent seasonal closures of **NFSR 101, 108 and NFST 1336** (Salida RD).*
  - v. *Remove the proposed seasonal closure of **NFSR 212** (Salida RD), which inhibits access to NFST 1411, which has no seasonal closures.*
  - vi. *Remove the existing and proposed seasonal closures of **NFSRs 101 and 105** (Slaughterhouse Gulch) (South Platte RD).*
  - vii. *Remove the existing and proposed seasonal closures of **NFSRs 212** (China Wall) and **212.A** (South Park RD).*
  - viii. *The DEIS does not provide adequate or necessary information on proposed dates for Seasonal Closures which hampers the public's ability to prepare and provide substantive and meaningful comments. [On October 29, 2019 an email was sent out by the USFS with a link to a spreadsheet that listed proposed "seasonal closure dates". This email was sent out just days prior to the deadline for DEIS comment submission. The spreadsheet contained 3,838 individual lines of information that the*

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<sup>5</sup> Sime, Carolyn A; 1999. Domestic Dogs in Wildlife Habitats, Effects of Recreation on Rocky Mountain Wildlife,

*public was expected to review and provide comments on. This is an unreasonable and excessive request of the public on behalf of the USFS and PSI Project Team. The Organizations must also question the logic used to determine the proposed seasonal closure dates as some dates are listed as beginning on the 1<sup>st</sup> of the month and others (e.g., in the South Park RD) on the 2<sup>nd</sup> of the month. This will be confusing and aggravating to the public (see 13.a.ii. above). The Organizations did not have adequate time to review this seasonal closure spreadsheet or prepare our comments prior to submitting this document].*

**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) proposes to **add seasonal closure to 505.09 miles of routes** and revise seasonal closures or make temporary seasonal closures permanent for **161.78 miles** of routes. We contend that this is an extraordinary and excessive amount of route mileage to be seasonally removed from public use and access.

We agree that there is need for two types of seasonal closures that should occur annually on specific routes that have been analyzed in this EIS. The first type is a winter range seasonal closure, starting generally on or about 12/1 and ending on or about 3/31. This type of seasonal closure should be applied on routes that are located within 5B Management Areas and have been recommended to be seasonally closed by CPW. The second type of seasonal closure that can be applied to analyzed routes in this EIS is a resource protection/Spring mud closure, starting generally on or about 4/1 and ending on or about 5/31. This type of seasonal closure should be applied on routes open to all vehicles that have documented watershed risks and road prism stability issues. All other seasonal closures should be considered on a year-by-year basis, and managed with Forest Orders so that accurate dates can be determined each year to meet the specific need for the closure.

The ROD does not provide adequate or necessary information on proposed dates for Seasonal Closures, which hampers the public's ability to analyze the proposed seasonal closures and make judicious objections if needed. Especially egregious is the continued seasonal closure of **NFSR 300, aka Rampart Range Road (RRR)** within the jurisdictional boundaries of El Paso County and the new, not previously proposed in the Scoping phase or DEIS, seasonal closure of **NFSR**

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**320, aka Mount Herman Road.** We acknowledge that Record of Decision states that “... *seasonal closures that balance the needs to protect natural resources, such as wildlife, and road conditions...*” However, we must object to the proposed and or continued seasonal closures of NFSR 300 and a new seasonal closure of NFSR 320 as neither seasonal closure of either road is based in fact to protect wildlife, preserve wildlife habitat, protect resources or preserve [vulnerable] road conditions. Chapter 2 of the FEIS states “*For example, some routes are closed permanently during the spring to limit potential erosion or damage from vehicles traveling over muddy routes; some routes are closed at other times of the year to limit impacts on wildlife during calving, nesting, winter forage, or other critical periods.*” We must contend that the seasonal closures of both NFSR’s 300 and 320 fails to meet any of the stated criteria or rationale for imposing seasonal restrictions upon the public for public use of these important regional east-west connectors and primary access corridors from the Front Range into the PSINF.

RRR is a 60-mile long gravel road that travels the forested crest of the Rampart Range from the Garden of the Gods near Colorado Springs to Douglas County Hwy. 67, approximately 10 miles west of Sedalia, CO. RRR is one of Colorado’s best, off-the-beaten track drives, traversing the undulating ridge of the Rampart Range its entire length between Colorado Springs and Sedalia. It is open to licensed vehicles only.

This scenic and historic gravel road yields spectacular views of Pikes Peak, the prairie, the Waldo Canyon burn area and the rugged Front Range and distant Tarryall mountains. The road provides access to serene camping, diverse mountain biking, back road driving experiences, hunting access and remains the only route to one of Colorado’s last fire lookouts atop Devils Head. Situated in the Pike National Forest, RRR was built during the Great Depression of the 1930s by the Civil Conservation Corps. The surface of the road is typically unimproved gravel and varies considerably but is traversable by passenger cars even without four-wheel drive. RRR provides exceptional recreational driving experiences along with a unique and quick opportunity to escape the urban environment of the Colorado Springs metropolitan area.

Since the Waldo Canyon fire in 2012, we have observed several closures of public access to RRR ranging from extended closures immediately following the fire to the current seasonal closure of the road to public access. Two separate portions of the road are now currently subject to seasonal road closure, the first from the Garden of the Gods to the entrance of Rampart Reservoir and the second from a point near the El Paso/Douglas County line to near Douglas County Hwy.

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67 (between Deckers and Sedalia). We understand that the northern closure has been in place for several years to mitigate winter conditions unique to the northern most portions of RRR.

The existing seasonal closure seems in part to be based solely on calendar dates and ignores actual road surface conditions. We are obligated and must point out that prior to the Waldo Canyon fire, RRR was open year-round and there were no gates in place to regulate or close the lower/southern portion of the road when road conditions were much more primitive than they are currently and winter snowfalls were more substantial.

We must contend that the conditions of RRR and any supposed hazards to the traveling public are no different now than in they were in past, before the Waldo Canyon fire when no seasonal road closure was required or ordered for this lower/southern segment. It is also significant that the closure only applies to motorized use, and that any and all non-motorized use, primarily mountain bike use, continues unfettered on the entire segment of RRR from Garden of the Gods to Rampart Reservoir.

RRR is a primary and unique unpaved recreational corridor that provides public access to the Rampart Range for the entire spectrum of year round recreational uses and pleasure driving. RRR provides a special byway to access Woodland Park and its surrounding areas for those who choose to avoid travelling US Hwy. 24. It remains a less risky and much safer alternative than traveling along Hwy. 24, especially for motorcyclists.

We contend that the seasonal closures of NFSR 300 and NFSR 320 are unfounded and are unnecessary and must be eliminated.

Again, the PSINF failed to take the required hard look at direct, indirect, and cumulative impacts from such seasonal closures contrary to NEPA. PSINF has also lost sight of the impacts its actions will have on the human environment.

## **OBJECTION 8:**

Previously submitted comments: *With few exceptions, the roads and trails within the PSINF have been in existence and providing public benefits for decades. History has shown that each of these routes provides a level of tangible recreational, economic and/or forest access value. The Hayman Fire demonstrated firsthand the advantages of having a robust and interconnected network of routes. Continuing to have an adequate network of forest roads and trails will be*

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*truly beneficial and necessary in providing sufficient access for future timber and fuels management, continuing forest visits and recreation, emergency egress and wildland firefighting efforts. The Organizations must point out that, per the Soils and Hydrology Report<sup>6</sup>, of the 2.2 million acres of the PSINF's Decision Area, the estimated 2,953 miles of routes on the PSI comprise less than 1.1% of the PSINF's total area. This 1.1% includes all routes both "open to" and "not open to the public" and all classes of motor vehicle routes (i.e., Roads and Trails open to motor vehicle use). The Final Environmental Analysis and statements of impacts all need to consider the extremely small scale of influence and impacts that any single route or even the total of all routes really imparts upon the PSINF area as a whole (i.e. each and every route on the PSINF when summed and totaled together only comprises 1.1% of the total Forest area).*

*We acknowledge that the PSINF has been challenged to adequately manage multiple-use/motorized recreation and the ever-increasing growth associated with the diverse forms of multiple-use recreation. However, we feel much of this stems from a rising need and demand for multiple-use recreational opportunities on public lands in general and especially near urbanized areas along the Front Range of Colorado. Several of the Ranger Districts within the PSINF are unique in that they are within close proximity of Colorado Springs, the second largest city in Colorado. As previously stated, the need and demand for OHV recreational opportunities are growing and will continue to grow, thereby the Organizations would insist that the PSINF should and must consider roads and trails as critical infrastructure for recreation.*

**Basis of Objection:** We object to the following individual route closures because the benefit of each of these routes has not been adequately analyzed or correctly attributed and closure of these routes will eliminate access desired and needed by the public, property owners, etc.:

- **NFSR 884.B (South Park RD)** – Decommissioning of this route eliminates access to public property. This route should remain as a road open to all vehicles. The TAP Recreational Use Benefit rating is Low, and we strongly object to that rating. It should be a High Recreational Use Benefit, just like the 884 and 884.A roads that lead up to this road.

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<sup>6</sup> Pike and San Isabel National Forest Public Motor Vehicle Use Environmental Impact Statement, Soils and Hydrology Report, October 2018, pg. 8

- **NFSR 336.A (Pikes Peak RD)** – Decommissioning of this route eliminates access for hunters and other recreational activities in the area currently accessed by NFSR 336.A. Due to the lack of adequate public involvement in the TAP process as documented in Objection 2 above, the recreational value of this short route has been undervalued and improperly characterized in the Pikes Peak RD TAP. This route should remain as a road or trail open to all vehicles. The TAP Recreational Use Benefit rating is Low, and we strongly object to that rating. It should be a Moderate or High Recreational Use Benefit, just like the 336 road that leads up to this road.
- **NFSR 540 (South Platte RD)** – Decommissioning of this route eliminates access to the South Platte River for each and every form of recreation in the South Platte River corridor. The significant loss of access for fishing in this area cannot be overlooked, disregarded or eliminated. This route should remain as a road or trail open to all vehicles. The TAP Recreational Use Benefit is Low, and we strongly object to that rating. Prior to the Hayman fire, this road was open for public access, and it was regularly used to access the river. It should be a High Recreational Use Benefit
- **NFSR 346.B (Pikes Peak RD)** – Converting the first 0.25 miles of this road to Admin Use Only (ML2) unnecessarily eliminates seasonal hunting access and access to Hotel Gulch. The entire 1.0-mile length of this route should remain as a road or trail open to all vehicles and fully accessible to the public. The TAP Recreational Use Benefit is Low, and we strongly object to that rating. It should be a High Recreational Use Benefit due to the hunting access demand.

Each of these routes' status should be changed from "decommissioned" to a "Road or Trail open to all vehicles".

The failure and take and incorporate public input such as this has been held to be unlawful under NEPA. *See Idaho Conservation League et al v. Guzman*, 766 F.Supp.2d 1056 (D.ID 2011).

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## **OBJECTION 9:**

Previously submitted comments: *Not all dead end roads are necessarily of low value and in need of closure. Many dead end spurs and “low value” routes provide access to picnic areas, dispersed camping sites, scenic overlooks, private property, etc. Although the values of these roads is less than that of main roads, connectors and loops, (i.e., “higher value” routes) their individual, overall benefit and value must be individually considered. We acknowledge that these roads will likely not generate much positive public interest and comment; however, these routes can still have substantial importance to the public. We would encourage the PSINF to listen to your own recreational and field staff when assessing any low value or dead end spur roads.*

*Duplicative roads and trails may on the surface appear redundant and not needed. This is often a claim from those unfamiliar with multiple-use and motorized recreation (an activity some of those individuals choose not to participate in) or simply seeking to eliminate or reduce public use of these routes. However, we would challenge that some duplicative routes may in fact offer unique benefits for distributing the use rather than concentrating use to a single route or may offer looping and other recreational (e.g., challenge) opportunities. Therefore, proposed route closures need to be evaluated not only at the level of the individual route or habitat, but also at a broader level of evaluating where a potential closure would displace affected users to, and the resultant impact to both areas.*

**Basis of Objection:** The FEIS and DRAFT ROD propose to “Decommission” over 153 miles of routes throughout the PSINF. Per pages 13 and 14 of the DRAFT ROD **86.34 mi +64.31 mi+2.46mi =153.11 miles** of existing routes are identified for “decommissioning”. Our objection is made due to the fact that the FEIS fails to include any of the specifics, details, treatments (e.g., Road entrance, Drainage, Prism, & Vegetation) or specific levels of decommissioning for each of the individual routes identified for decommissioning (and will be closed and lost to public use and access). The FEIS includes a General Assumption and a Glossary definition that “*Blocking the entrance to a route is the minimum requirement for decommissioning. Refer to 36 CFR 212.5(b)(2) for potential route decommissioning activities.*” However the FEIS does not include the necessary evaluation of the individual site-specific concerns unique to each route identified for decommissioning. We recognize that decommissioning could be as minor as simply blocking the entrance to a complete obliteration of the route and re-contouring of the terrain. The FEIS does not include any site-specific analysis

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as to the environmental impacts of route decommissioning and affects either positive or negative to the vegetation, hydrology, channel hydraulics, aquatic, riparian, wildlife, and terrestrial ecosystems just to name a few. The final ROD needs to be specific as to the exact level of decommissioning for each decommissioned route.

NEPA is to analyze how an action will affect the human environment. 42 U.S.C. § 4332(C). Decommissioning is clearly an activity subject to the notice, comment and analysis requirements of NEPA. Here, the PSINF must do NEPA on each and every road and/or segment it proposes to decommission.

## **OBJECTION 10:**

Previously submitted comments: *Continental Divide Trail Management. The Organizations are aware of numerous discussions around the management of the Continental Divide Scenic Trail (“CDNST”) footprint and lands adjacent to the trail that are occurring on the Rio Grande NF, GMUG NF, and three forests in New Mexico. Additionally, we are aware of five travel plans where similar concepts are being advanced in winter travel planning in California. While the PSI DEIS has stated that such a concept is not moving forward in the planning process, the Organizations believe it is important to note our opposition to the management of the CDNST footprint and adjacent lands in a single manner or any decision that the trail is only open to “Horse and hike”.*

*Single standard management is a direct violation of the National Trail System Act (“NTSA”) requirement that any national trail be managed in a manner consistent with adjacent forest planning guidance. Moreover, the NTSA clearly identifies that management decisions are to be made on a segment-by-segment basis rather than at the landscape. Segment based management is an important standard for the CDNST as both the NTSA and CDNST plan both specifically allow motorized usage on the CDNST. Clearly, concepts such as management by segments are necessary for the management of any long distance route as it will cross Congressionally designated Wilderness as well as enter medium sized communities. The Organizations also note that such a single-minded concept also conflicts with the existing PSINF resource management plan. The Organizations believe the multiple use nature of the CDNST is one of the great strengths of the trail and are opposed to any efforts to alter such a decision.*

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**Basis of Objection:** The Organizations anticipate this issue to be raised in the Objection process for this project, as this has occurred on numerous other forests that have declined to apply exclusionary corridors in planning. This continued objection is exemplified by the Shoshone NF planning process.<sup>7</sup> The Organizations are objecting to this issue to preserve our ability to participate in any resolutions of the objection and ensure that any management decisions applied are reflecting the NTSA mandate that decisions on any National Trail be made on a segment by segment basis,<sup>8</sup> allows all forms of recognized uses under the NTSA which specifically includes all forms of motorized usage,<sup>9</sup> recognizes the need to maximize values associated with the multiple use of NTSA routes<sup>10</sup> and are in compliance with similar provisions of the NTSA management plan.<sup>11</sup>

## **OBJECTION 11:**

**Previously submitted comments:** *The Organizations unequivocally support the “leave as is” (i.e., open to public access) recommended action in Alternative C for the entire length of NFSR 346 (aka Hotel Gulch, Pikes Peak RD). 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 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 corridor of SH 67 and NFSR 300. The roadside vegetation along NFSR 346 is extremely lush for the entire length, the number of*

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<sup>7</sup> See, Objection of Continental Divide Trail Society; Full copy of decision documents related to this objection is available here. [Shoshone National Forest - Land & Resources Management \(usda.gov\)](https://www.usda.gov/land-resources/forest-management/shoshone-national-forest-land-resources-management)

<sup>8</sup> See, 16 USC 1246(a)(2)

<sup>9</sup> See, 16 USC 1246 (j).

<sup>10</sup> See, 16 USC 1242 (a)(2).

<sup>11</sup> See, USDA Forest Service; *The 2009 Continental Divide National Scenic Trail Comprehensive Plan*; September 2009 at pg. 3.

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*stream crossings is nil. The soils in this watershed are typical of the entire Rampart Range. The slope aspects along with the soils have resulted in very 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. The Organizations support adding PA 18 to connect NFSRs 346 and 300.F as a road open to all vehicles to help disperse use and reduce use on the upper/eastern portion of NFSR 346.*

**Basis of Objection:** The Organizations are objecting to this issue to preserve our ability to participate in any resolutions of any objections that might be filed regarding a change in the Decision to keep ALL segments of NFSR 346 as a “Road open to all vehicles”. We currently agree with and support the DRAFT Record of Decision and FEIS to keep ALL segments of NFSR 346, from milepost 0.00 to milepost 4.90, for the entire length of NFSR 346 as a “Road open to all vehicles” from County Road 79 to NFSR 300.

## **Objection 12**

Previously submitted comment: 1) *Table 1., Summary of Specific Additions and or Modifications to Alternative C (Proposed Alternative), South Platte Ranger District, NFSR 126 (aka Twin Cone), reopen and reestablish access to the upper section of the route, covert to a trail open to all vehicles (i.e. MP 5.13 to 7.37).*

2) *Regarding the stipulations for the consideration of Seasonal Closures pursuant to Paragraph 4 of Exhibit B, for areas designated under the Forest Plan as 5B Big Game Winter Range Areas, we offer the following comments for the South Platte Ranger District: NFSR 126 provides the sole and only access to North Twin Cone Peak. Public motorized access all the way to the top provides an important and unique experience. Likewise, NFSR 101 and 105 provide the only access to the Slaughterhouse Gulch area and the associated multi-use recreational opportunities there.*

**Basis of Objection:** The DRAFT Record of Decision for implementing the selected alternative [Alternative C] for the Pike and San Isabel National Forests (PSI) Public Motor Vehicle Use Final Environmental Impact Statement (FEIS) to convert the upper segment of NFSR 126 Twin Cones to a **Road, open to administrative use only** is unsupported by the analysis in the FEIS or elsewhere in the project record. The justifications provided for closing it to the public have been 1.) Forest Plan compliance with the 3A management area, and 2.) The TAP recommendation,

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which also relied on the 3A intrusion as its reason for recommending closure. The Forest Plan Amendment adopted in the Draft Decision would eliminate the 3A intrusion by placing the entire length of NFSR 126 outside of the 3A area. (*Note that this issue was originally caused by and propagated by a simple mapping error*).

Under the 1984 Forest Plan, NFSR 126 is almost entirely within 4B and 7A management zones, which both allow dispersed motorized recreation. The route is entirely inside a Roaded Natural ROS area, which also allows motorized recreation. While the road pre-dated 1984, and the management zones in the Forest Plan were originally intended to be drawn around the road, but a mapping error resulted in a short segment of NFSR 126 intruding [inadvertently] into a 3A management zone. The last two miles of NFSR 126 have been closed as a temporary administrative road since 2016 under the Forest Service order implementing the conditions of the Settlement Agreement, which initiated this travel management process. The reason for the closure of NFSR 126 has been based upon the alleged 3A area intrusion caused by a mapping error.

The PSINF has erroneously asserted that the upper segment cannot be open to public access because of the 3A intrusion (*which will no longer exist with the Forest Plan Amendment*) and because of a recommendation in the South Platte RD TAP report to convert the route to a **Road, open to administrative use only**. Once the Forest Plan Amendment is adopted, the reason stated in the TAP report for conversion of the upper segment of NFSR 126 to an administrative road will no longer be valid.

The PSINF's rationalization for continued closure of this road is not logical, is not supported by the factual information and fails to articulate any rational basis for the decision to keep the route closed to public access. Moreover, the MRS Screening Criteria used for this project and the analysis in the FEIS supporting the Forest Plan Amendment both support a management action which would reopen the entire upper segment to the summit of North Twin Cone Peak to public, motorized use.

The Organizations believe that the decision to convert the upper segment of NFSR 126 Twin Cone to a **Road, open to administrative use only** has been made in error and is thereby unwarranted and unnecessary. Therefore, this decision should be overturned and the upper portion of NFSR 126 from mileposts 5.67 to 7.37 designated as open to public motorized use as

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either a Road (or trail) Open to All Vehicles. The Organizations also hereby support and endorse the objections by Marcus Trusty (for C.O.R.E.) and Patrick McKay regarding this closure of the upper portion of NFSR 126.

Courts review agency compliance with NEPA and NFMA under the APA. 5 U.S.C. §§ 702-706; *Silverton Snowmobile Club v. U.S. Forest Service*, 433 F.3d 772, 779-780 (10th Cir. 2006). Under the APA, a “reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A).

### **Conclusion**

For all the reasons above, we urge the PSINF to address and correct these important issues and shortcomings in its final ROD and EIS. To do otherwise would be inconsistent with the Purpose and Need, the agency’s statutory authority, NEPA, the DQA and the public interest.

The Organizations would welcome a discussion of these objections at your convenience. Our technical point of contact for this project will be William Alspach, P.E. at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259, [williamalspach@gmail.com](mailto:williamalspach@gmail.com).

Sincerely,

HOLSINGER LAW, LLC

A handwritten signature in black ink, appearing to read 'K. Holsinger', written over a horizontal line.

Kent Holsinger

cc: Don Riggle, Director of Operations, Trails Preservation Alliance  
Scott Jones, Esq., COHVCO

Enclosure: Appendix A – Spreadsheet for Alternative C – Reference Objection #2 – Reveals 218 road segments that were unacceptably changed by the PSI staff.

| Type of resource (road, trail or area)   |
|--|--|--|--|--|--|--|--|--|--|--|--|--|
| ROAD                                   | LEADVILLE                              | 110                                    | HALFMOON                               | yearlong                               | 6.74                                   | 11.71                                  | 4.97                                   | H                                      | H/H                                    | 1                                      | Keep as is                             | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles                                      |
| ROAD                                   | LEADVILLE                              | 110                                    | HALFMOON                               | yearlong                               | 11.71                                  | 11.91                                  | 0.2                                    | H                                      | H/H                                    | 100                                    | Keep as is                             | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
|  | LEADVILLE                              | 145                                    | SLIDE LAKE 4WD                         | seasonal                               | 1.22                                   | 2.64                                   | 1.42                                   | H                                      | H/H                                    | 2                                      | Keep as is                             | No data  |
| ROAD                                   | LEADVILLE                              | 382                                    | SAYRES GULCH 4WD                       | yearlong                               | 0                                      | 1.72                                   | 1.72                                   | M                                      | H/H                                    | 1                                      | Keep as is                             | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles                                      |
| ROAD                                   | LEADVILLE                              | 391                                    | SOUTH FORK LAKE CR                     | yearlong                               | 0                                      | 5.62                                   | 5.62                                   | H                                      | H/H                                    | 1                                      | Keep as is                             | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, install fencing, and convert to trail open to all vehicles                     |
| ROAD                                   | LEADVILLE                              | 393                                    | PEAKABOO GULCH                         | yearlong                               | 0                                      | 2                                      | 2                                      | M                                      | L/L                                    | 1                                      | Keep as is                             | Convert to trail open to all vehicles  |
| ROAD                                   | LEADVILLE                              | 394                                    | MC NASSAR GULCH 4WD                    | yearlong                               | 0                                      | 1.1                                    | 1.1                                    | M                                      | H/H                                    | 1                                      | Keep as is                             | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD                                   | LEADVILLE                              | 104.A                                  | SOUTH PORTAL SIGN                      | yearlong                               | 0                                      | 0.03                                   | 0.03                                   | H                                      | L/L                                    | 1                                      | Convert to trail open to all vehicles  | Convert to trail open to all vehicles  |

|      |            |       |                        |          |      |      |      |   |     |     |   |  |
|------|------------|-------|------------------------|----------|------|------|------|---|-----|-----|---|--|
| ROAD | LEADVILLE  | 110.C | KILN                   | yearlong | 0    | 0.26 | 0.26 | M | L/L | 1   | Decommission                              | Convert to trail open to all vehicles  |
| ROAD | LEADVILLE  | 125.C | HOLLENBECK             | yearlong | 0    | 1.1  | 1.1  | M | L/L | 1   | Keep as is                                | Convert to trail open to all vehicles  |
| ROAD | LEADVILLE  | 175.A | MT ELBERT PICNIC AREA  | yearlong | 0    | 0.14 | 0.14 | H | L/H | 1   | Keep as is                                | Convert to trail open to all vehicles  |
| ROAD | LEADVILLE  | 175.B | BIG MAC FISHERMAN PRKG | yearlong | 0    | 0.13 | 0.13 | H | L/H | 1   | Keep as is                                | Convert to trail open to all vehicles  |
| ROAD | LEADVILLE  | 390.A | N FORK CLEAR CR 4WD    | yearlong | 0    | 2.16 | 2.16 | H | H/H | 1   | Keep as is                                | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, install fencing, and convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 323   | WINDING STAIRS         | yearlong | 0    | 3.87 | 3.87 | M | L/L | 1   | No data                                   | Convert to trail open to all vehicles  |
| ROAD | PIKES PEAK | 348   | LONG HOLLOW            | yearlong | 0    | 4.48 | 4.48 | H | H/H | 1   | Add seasonal closure                      | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 348   | LONG HOLLOW            | seasonal | 4.48 | 6.86 | 2.38 | H | H/H | 2   | Make temporary seasonal closure permanent | Revise existing seasonal closure and convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 322.A | LIMBAUGH               |          | 0    | 1.8  | 1.8  | H | H/H | 101 | Decommission                              | Increase maintenance interval and techniques, reinforce and harden stream crossing, and convert to trail open to all vehicles                                |

|      |            |        |                   |          |   |      |      |   |     |   |              |                                       |
|------|------------|--------|-------------------|----------|---|------|------|---|-----|---|--------------|---------------------------------------|
| ROAD | PIKES PEAK | 324.A  | CHIMNEY PEAK      | yearlong | 0 | 0.5  | 0.5  | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 325.B  | SAYLOR PARK SOUTH | yearlong | 0 | 0.5  | 0.5  | M | L/L | 1 | Decommission | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 332.AA | SARAH SPUR        | yearlong | 0 | 0.35 | 0.35 | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 341.B  | CHAIR             | yearlong | 0 | 0.2  | 0.2  | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 357.H  | LEFT              | yearlong | 0 | 0.22 | 0.22 | M | L/L | 1 | Decommission | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 357.K  | ELVIS             | yearlong | 0 | 0.17 | 0.17 | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 357.L  | CAMP              | yearlong | 0 | 0.04 | 0.04 | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 359.E  | CEDAR CUT 1       | yearlong | 0 | 0.44 | 0.44 | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | PIKES PEAK | 359.F  | CEDAR CUT 2       | yearlong | 0 | 0.62 | 0.62 | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |

|      |            |        |                   |          |      |      |      |   |     |   |            |   |
|------|------------|--------|-------------------|----------|------|------|------|---|-----|---|------------|---|
| ROAD | PIKES PEAK | 359.G  | CEDAR CUT<br>3    | yearlong | 0    | 1    | 1    | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 379.C  | ELK CAMP          | yearlong | 0    | 0.1  | 0.1  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 379.E  | 379.E             | yearlong | 0    | 0.1  | 0.44 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 379.E  | 379.E             | yearlong | 0    | 0.44 | 0.44 | H | L/L | 1 | No data    | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 381.A  | WYE NORTH         | yearlong | 0    | 1    | 1    | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 381.AA | WYE NORTH<br>SPUR | yearlong | 0    | 0.3  | 0.3  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | PIKES PEAK | 381.B  | PIT               | yearlong | 0    | 0.4  | 0.4  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA     | 212    | PASS CREEK        | yearlong | 3.11 | 4    | 0.89 | H | H/H | 1 | No data    | Increase maintenance interval/techniques, add seasonal closure, and convert to trail open to motorcycles only |
| ROAD | SALIDA     | 212    | PASS CREEK        | yearlong | 3.11 | 4    | 0.89 | H | H/H | 1 | Keep as is | No data   |

|      |        |       |                       |          |      |      |      |   |     |   |                      |   |
|------|--------|-------|-----------------------|----------|------|------|------|---|-----|---|----------------------|---|
| ROAD | SALIDA | 212   | PASS CREEK            | yearlong | 3.11 | 4    | 0.89 | H | H/H | 1 | Add seasonal closure | No data   |
| ROAD | SALIDA | 278   | UPPER BROWNS CR 4WD   | yearlong | 0    | 6.78 | 6.78 | H | H/H | 1 | Keep as is           | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SALIDA | 295   | HANCOCK               | yearlong | 5.45 | 6.97 | 1.52 | H | H/H | 1 | Keep as is           | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SALIDA | 376   | LENHARDY CUTOFF       | yearlong | 0    | 0.23 | 0.23 | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SALIDA | 376   | LENHARDY CUTOFF       | yearlong | 5.95 | 6.96 | 1.01 | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SALIDA | 200.D | 200.D                 | yearlong | 0    | 0.05 | 0.05 | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SALIDA | 201.B | S CHRISTMAS TREE SPUR | yearlong | 0    | 0.2  | 0.2  | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SALIDA | 202.D | 202.D                 | yearlong | 0    | 0.07 | 0.07 | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SALIDA | 203.C | 203.C                 | yearlong | 0    | 0.19 | 0.19 | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |

|      |        |        |                         |          |   |      |      |   |     |   |  |                                       |
|------|--------|--------|-------------------------|----------|---|------|------|---|-----|---|--|---------------------------------------|
| ROAD | SALIDA | 225.D  | FOOSES CREEK SPUR D     | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 230.A  | PRINCE ALBERT           | yearlong | 0 | 0.1  | 0.1  | H | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 230.C  | HOFFMAN PARK            | yearlong | 0 | 1.18 | 1.18 | M | L/L | 1 | Convert to admin use only road (ML2, maintenance schedule=9 years) | Convert to trail open to all vehicles |
| ROAD | SALIDA | 274.B  | 274.B                   | yearlong | 0 | 0.17 | 0.17 | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 278.A  | ANTERO 4WD              | yearlong | 0 | 1.1  | 1.1  | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 278.B  | MT WHITE 4WD            | yearlong | 0 | 1.46 | 1.46 | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 278.C  | ANTERO/MT. WHITE CUTOFF | yearlong | 0 | 0.5  | 0.5  | M | L/L | 1 | Keep as is   | Convert to trail open to all vehicles |
| ROAD | SALIDA | 300.B  | BALD MTN SPUR           | yearlong | 0 | 2.2  | 2.2  | M | L/L | 1 | Convert to trail open to all vehicles                              | Convert to trail open to all vehicles |
| ROAD | SALIDA | 308.B2 | S. KAUFMAN RIDGE SPUR   | seasonal | 0 | 0.13 | 0.13 | M | L/L | 2 | Keep as is   | Convert to trail open to all vehicles |

|      |        |       |                          |          |   |      |      |   |     |   |            |                                       |
|------|--------|-------|--------------------------|----------|---|------|------|---|-----|---|------------|---------------------------------------|
| ROAD | SALIDA | 308.C | N. KAUFMAN<br>RIDGE SPUR | seasonal | 0 | 0.34 | 0.34 | M | L/L | 2 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 308.H | 308.H                    | seasonal | 0 | 0.16 | 0.16 | M | L/L | 2 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 311.B | 311.B                    | seasonal | 0 | 0.31 | 0.31 | M | L/L | 2 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 311.F | 311.F                    | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 315.A | 315.A                    | yearlong | 0 | 0.33 | 0.33 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 315.B | 315.B                    | yearlong | 0 | 0.12 | 0.12 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 315.C | 315.C                    | yearlong | 0 | 0.11 | 0.11 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 344.H | 344.H                    | yearlong | 0 | 0.14 | 0.14 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SALIDA | 344.I | 344.I                    | yearlong | 0 | 0.21 | 0.21 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |

|      |               |        |                            |          |      |       |      |   |     |   |            |   |
|------|---------------|--------|----------------------------|----------|------|-------|------|---|-----|---|------------|---|
| ROAD | SALIDA        | 365.C  | 365.C                      | yearlong | 0    | 0.14  | 0.14 | H | L/H | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA        | 373.A  | LITTLE<br>FOURMILE<br>SPUR | yearlong | 0    | 0.55  | 0.55 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA        | 375.C  | FOURMILE<br>RANCH          | yearlong | 0    | 0.59  | 0.59 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA        | 375.E  | FOURMILE<br>SPUR           | yearlong | 0    | 0.3   | 0.3  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA        | 376.AC | 376.AC                     | yearlong | 0    | 0.35  | 0.35 | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SALIDA        | 6.3C   | S. PRONG<br>HAYDEN CR      | yearlong | 0    | 0.13  | 0.13 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SAN<br>CARLOS | 120    | SOUTH<br>COLONY            | yearlong | 1.03 | 4.09  | 3.06 | H | H/H | 1 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles |
| ROAD | SAN<br>CARLOS | 160    | HERMIT<br>LAKE             | yearlong | 3.7  | 10.78 | 7.08 | H | H/H | 1 | Keep as is | Increase maintenance interval/techniques, add seasonal closure, and convert to trail open to all vehicles   |
| ROAD | SAN<br>CARLOS | 198    | LAKE CREEK                 | yearlong | 3.35 | 10.93 | 7.58 | H | H/H | 1 | Keep as is | Increase maintenance interval/techniques, add seasonal closure, install fencing, and convert to trail open to all vehicles                                |

|      |            |     |              |          |      |      |      |   |     |   |                         |  |
|------|------------|-----|--------------|----------|------|------|------|---|-----|---|-------------------------|--|
| ROAD | SAN CARLOS | 304 | BEAR GULCH   | seasonal | 0.7  | 3.45 | 2.75 | H | H/H | 2 | Revise seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, remove seasonal closure, install fencing, and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 320 | SAN CARLOS   | yearlong | 0    | 3.01 | 3.01 | H | H/H | 1 | Add seasonal closure    | Increase maintenance interval/techniques, reinforce/harden stream crossing, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 324 | BIGELOW      | yearlong | 0    | 2.31 | 2.31 | H | H/H | 1 | Keep as is              | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 331 | PEERLESS     | yearlong | 0    | 1.8  | 1.8  | H | H/H | 1 | Keep as is              | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 337 | DUCKETT      | yearlong | 1.18 | 4.11 | 2.94 | H | H/H | 1 | Keep as is              | Reinforce/harden stream crossing and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 364 | RUSHMER      | yearlong | 0    | 1.31 | 1.31 | H | H/H | 1 | Keep as is              | Increase maintenance interval/techniques, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 370 | WASHOUT      | yearlong | 0    | 0.07 | 0.07 | H | L/L | 1 | Keep as is              | Convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 396 | LITTLE FROZE | seasonal | 0    | 6.13 | 6.13 | H | H/H | 2 | Keep as is              | Revise existing seasonal closure and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 401 | DEER PEAK    | seasonal | 0    | 5.21 | 5.21 | H | H/H | 2 | Keep as is              | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, revise existing seasonal closure, and convert to trail open to all vehicles         |

|      |            |     |                   |          |      |       |      |   |     |   |            |   |
|------|------------|-----|-------------------|----------|------|-------|------|---|-----|---|------------|---|
| ROAD | SAN CARLOS | 402 | MEADOW DIVIDE     | seasonal | 0    | 8.88  | 8.88 | H | H/H | 2 | Keep as is | Reinforce/harden stream crossing, revise existing seasonal closure, and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 410 | TRACY CANYON      | yearlong | 0    | 1.38  | 1.38 | H | H/H | 1 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles                  |
| ROAD | SAN CARLOS | 412 | MUDDY CREEK       | yearlong | 0    | 5.59  | 5.59 | H | H/H | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 421 | EAST INDIAN CREEK | yearlong | 6.61 | 6.98  | 0.36 | H | H/H | 1 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, install fencing, and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 421 | EAST INDIAN CREEK | yearlong | 6.98 | 11.94 | 4.96 | H | H/H | 1 | Keep as is | Add seasonal closure, install fencing, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 435 | REED GULCH        | seasonal | 0    | 3.66  | 3.66 | H | H/H | 2 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, revise existing seasonal closure, and convert to trail open to all vehicles      |
| ROAD | SAN CARLOS | 436 | TRINCHERA         | yearlong | 0.19 | 3.5   | 3.31 | H | H/H | 1 | Keep as is | Add seasonal closure, install fencing, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 437 | FAN DIKE          | yearlong | 0    | 2.95  | 2.95 | H | H/H | 1 | Keep as is | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 439 | COTTONWOOD        | seasonal | 0    | 2.09  | 2.09 | H | H/H | 2 | Keep as is | Convert to trail open to all vehicles   |

|      |            |       |              |          |      |      |      |   |     |   |                         |  |
|------|------------|-------|--------------|----------|------|------|------|---|-----|---|-------------------------|--|
| ROAD | SAN CARLOS | 440   | WYLIE GULCH  | yearlong | 0    | 2.1  | 2.1  | H | H/H | 1 | Keep as is              | Convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 440   | WYLIE GULCH  | seasonal | 2.1  | 5.84 | 3.74 | H | H/H | 2 | Keep as is              | Convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 442   | BULLS EYE    | yearlong | 0    | 0.39 | 0.39 | H | H/H | 1 | Keep as is              | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 559   | MEDANO PASS  | yearlong | 7.36 | 9.2  | 1.84 | H | H/H | 1 | Add seasonal closure    | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 580   | HUERFANO     | yearlong | 0    | 2.02 | 2.02 | H | H/H | 1 | Keep as is              | Increase maintenance interval/techniques, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 635   | BLACK MTN.   | seasonal | 0    | 8.82 | 8.82 | H | H/H | 2 | Keep as is              | Revise existing seasonal closure and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 637   | TURKEY CREEK | yearlong | 0    | 3.31 | 3.31 | H | H/H | 1 | Revise seasonal closure | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 637   | TURKEY CREEK | yearlong | 3.31 | 5.58 | 2.27 | H | H/H | 1 | Keep as is              | Make temporary seasonal closure permanent and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 119.B | 119.B        | yearlong | 0    | 0.01 | 0.01 | M | L/L | 1 | Keep as is              | Convert to trail open to all vehicles  |

|      |            |       |              |          |   |      |      |   |     |   |            |  |
|------|------------|-------|--------------|----------|---|------|------|---|-----|---|------------|--|
| ROAD | SAN CARLOS | 143.B | 143.B        | yearlong | 0 | 0.05 | 0.05 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |
| ROAD | SAN CARLOS | 304.A | 304.A        | yearlong | 0 | 0.04 | 0.04 | H | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 304.B | 304.B        | yearlong | 0 | 0.09 | 0.09 | H | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 315.D | 315.D        | yearlong | 0 | 0.02 | 0.02 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |
| ROAD | SAN CARLOS | 324.A | BIGELOW SPUR | yearlong | 0 | 0.5  | 0.5  | H | H/H | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 337.A | 337.A        | yearlong | 0 | 0.05 | 0.05 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |
| ROAD | SAN CARLOS | 337.B | 337.B        | yearlong | 0 | 0.09 | 0.09 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |
| ROAD | SAN CARLOS | 337.C | 337.C        | yearlong | 0 | 0.09 | 0.09 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |
| ROAD | SAN CARLOS | 337.D | 337.D        | yearlong | 0 | 0.02 | 0.02 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles                          |

|      |            |       |       |          |   |      |      |   |     |   |            |   |
|------|------------|-------|-------|----------|---|------|------|---|-----|---|------------|---|
| ROAD | SAN CARLOS | 401.H | 401.H | yearlong | 0 | 0.01 | 0.01 | H | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 402.B | 402.B | yearlong | 0 | 0.13 | 0.13 | H | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 409.A | 409.A | yearlong | 0 | 0.07 | 0.07 | M | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 413.A | 413.A | yearlong | 0 | 0.06 | 0.06 | H | L/L | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 421.C | 421.C | yearlong | 0 | 0.06 | 0.06 | H | L/H | 1 | Keep as is | Convert to trail open to all vehicles   |
| ROAD | SAN CARLOS | 421.G | 421.G | yearlong | 0 | 0.17 | 0.17 | H | H/H | 1 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, install fencing, and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 421.H | 421.H | yearlong | 0 | 0.07 | 0.07 | H | H/H | 1 | Keep as is | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, install fencing, and convert to trail open to all vehicles |
| ROAD | SAN CARLOS | 635.B | 635.B | yearlong | 0 | 1.26 | 1.26 | M | H/H | 1 | Keep as is | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SAN CARLOS | 78.A  | 78.A  | yearlong | 0 | 0.48 | 0.48 | H | H/H | 1 | Keep as is | Install fencing and convert to trail open to all vehicles   |

|      |            |     |               |          |      |      |      |    |     |     |                      |  |
|------|------------|-----|---------------|----------|------|------|------|----|-----|-----|----------------------|--|
| ROAD | SOUTH PARK | 2   | LING          | yearlong | 0    | 1.52 | 1.52 | H  | L/H | 1   | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 8   | BUCKSKIN      | yearlong | 4.7  | 5.53 | 0.83 | HH | H/H | 3   | Add seasonal closure | Increase maintenance interval/techniques, add seasonal closure, install fencing, and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 44  | PUMA          | yearlong | 0.5  | 7.2  | 6.7  | H  | H/H | 1   | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 145 | PAIGE         | yearlong | 3.46 | 4.34 | 0.88 | M  | L/L | 1   | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 155 | TRANSECT      | No data  | 0    | 1.4  | 1.4  | L  | H/H | 101 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 158 | BEAR GULCH    | yearlong | 0    | 3.3  | 3.3  | H  | H/H | 1   | Add seasonal closure | Reinforce/harden stream crossing and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 176 | BROWNS PASS   | yearlong | 0    | 0.5  | 0.5  | H  | H/H | 1   | Keep as is           | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 176 | BROWNS PASS   | yearlong | 0.74 | 4.11 | 3.37 | H  | H/H | 1   | No data              | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 201 | CRYSTAL CREEK | yearlong | 0    | 5.2  | 5.2  | H  | H/H | 1   | Keep as is           | Increase maintenance interval/techniques, reinforce/harden stream crossing, and convert to trail open to all vehicles  |

|      |            |     |                 |          |      |      |      |    |     |   |                      |  |
|------|------------|-----|-----------------|----------|------|------|------|----|-----|---|----------------------|--|
| ROAD | SOUTH PARK | 204 | BOX             | yearlong | 0    | 1.88 | 1.88 | H  | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 213 | MARKSBURY       | yearlong | 0    | 2.18 | 2.18 | HH | H/H | 1 | Keep as is           | Increase maintenance interval/techniques and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 230 | THORPE          | yearlong | 0    | 3    | 3    | M  | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 231 | BURNS PARK      | yearlong | 0    | 1    | 1    | H  | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 254 | THIRTYNINE MILE | yearlong | 0    | 4.7  | 4.7  | H  | H/H | 1 | No data              | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles                                      |
| ROAD | SOUTH PARK | 255 | NEVER           | yearlong | 0    | 1.4  | 1.4  | M  | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 259 | FIGURE 9        | yearlong | 0.4  | 1.4  | 1    | M  | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 261 | DICKS PEAK      | yearlong | 0    | 3.54 | 3.54 | H  | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 265 | ANTELOPE        | yearlong | 0.55 | 3.08 | 2.53 | H  | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |

|      |            |     |               |          |     |      |      |   |     |   |                      |  |
|------|------------|-----|---------------|----------|-----|------|------|---|-----|---|----------------------|--|
| ROAD | SOUTH PARK | 266 | GOOSEBERRY    | yearlong | 0   | 0.78 | 0.78 | H | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 269 | BLACK         | yearlong | 0   | 2.41 | 2.41 | H | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, install fencing, and convert to trail open to all vehicles      |
| ROAD | SOUTH PARK | 270 | UNION         | yearlong | 0   | 5.27 | 5.27 | H | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 272 | GRIZZLY       | yearlong | 2.2 | 3.3  | 1.1  | H | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 277 | CHAIN BRAKE   | yearlong | 0   | 0.4  | 0.4  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 288 | MORNING STAR  | yearlong | 0   | 0.78 | 0.78 | H | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, install fencing, and convert to trail open to all vehicles      |
| ROAD | SOUTH PARK | 295 | HAPPY PLATTE  | seasonal | 0   | 4.25 | 4.25 | H | H/H | 2 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 393 | WAGON TONGUE  | seasonal | 0   | 4.9  | 4.9  | H | H/H | 2 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles                        |
| ROAD | SOUTH PARK | 423 | THOMPSON PARK | yearlong | 0   | 2.89 | 2.89 | H | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |

|      |            |     |              |          |      |      |      |   |     |     |                      |  |
|------|------------|-----|--------------|----------|------|------|------|---|-----|-----|----------------------|--|
| ROAD | SOUTH PARK | 427 | DEADMAN      | yearlong | 0    | 2.07 | 2.07 | H | H/H | 3   | Add seasonal closure | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 430 | CRITERION    | yearlong | 0    | 2.18 | 2.18 | H | H/H | 1   | Add seasonal closure | Reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 432 | LONG PARK    | seasonal | 0    | 2.74 | 2.74 | H | H/H | 2   | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, revise existing seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 433 | PONY PARK    | yearlong | 0    | 1.21 | 1.21 | H | H/H | 1   | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles             |
| ROAD | SOUTH PARK | 433 | PONY PARK    | seasonal | 1.21 | 7.61 | 6.4  | H | H/H | 2   | Add seasonal closure | Increase maintenance interval/techniques, reinforce/harden stream crossing, revise existing seasonal closure, and convert to trail open to all vehicles                                      |
| ROAD | SOUTH PARK | 434 | ARROWHEAD    | yearlong | 0    | 0.91 | 0.91 | H | H/H | 1   | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles             |
| ROAD | SOUTH PARK | 442 | TUMBLE CREEK | yearlong | 0    | 1.63 | 1.63 | H | H/H | 1   | Add seasonal closure | Increase maintenance interval/techniques, add seasonal closure, and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 449 | NARROW GAUGE | yearlong | 0    | 2.33 | 2.33 | H | L/H | 1   | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 540 | CORRAL CREEK | yearlong | 3.05 | 4.89 | 1.84 | H | L/H | 100 | Decommission         | Convert to trail open to all vehicles  |

|      |            |     |                |          |      |      |      |   |     |   |                      |   |
|------|------------|-----|----------------|----------|------|------|------|---|-----|---|----------------------|---|
| ROAD | SOUTH PARK | 659 | W BEAVER CREEK | seasonal | 6.68 | 10.4 | 3.72 | H | H/H | 4 | Add seasonal closure | Reinforce/harden stream crossing, add seasonal closure, install fencing, and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 750 | AMAZONSTONE    | yearlong | 0    | 1.94 | 1.94 | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 751 | CRYSTAL CABIN  | yearlong | 0    | 1.1  | 1.1  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 752 | SMOKEY QUARTZ  | yearlong | 0    | 0.58 | 0.58 | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 753 | CARR           | yearlong | 0    | 1.1  | 1.1  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 754 | OUT BACK       | yearlong | 0    | 1    | 1    | M | L/L | 1 | Decommission         | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 755 | SKIRMISH       | yearlong | 0    | 0.5  | 0.5  | M | L/L | 1 | Decommission         | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 831 | WHITEFACE      | yearlong | 0    | 0.9  | 0.9  | H | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 857 | SWITCHBACK     | yearlong | 0    | 0.85 | 0.85 | H | L/H | 1 | Keep as is           | Convert to trail open to all vehicles   |

|      |            |        |            |          |   |      |      |   |     |   |                      |   |
|------|------------|--------|------------|----------|---|------|------|---|-----|---|----------------------|---|
| ROAD | SOUTH PARK | 863    | EGORE IV   | yearlong | 0 | 0.96 | 0.96 | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 873    | Y          | yearlong | 0 | 0.6  | 0.6  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 874    | CANE HILL  | yearlong | 0 | 0.3  | 0.3  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 875    | BOLETES    | yearlong | 0 | 2.1  | 2.1  | H | H/H | 1 | Keep as is           | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 879    | CANE       | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 890    | DRY GULCH  | yearlong | 0 | 4.02 | 4.02 | H | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 136.1A | OLD VOLZ   | yearlong | 0 | 0.74 | 0.74 | M | L/L | 1 | Keep as is           | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 136.1B | CUT BLOCK  | yearlong | 0 | 0.9  | 0.9  | M | L/L | 1 | Keep as is           | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 142.A1 | PROMONTORY | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1 | Decommission         | Make temporary seasonal closure permanent and convert to trail open to all vehicles   |

|      |            |        |                     |          |   |      |      |    |     |   |                                 |  |
|------|------------|--------|---------------------|----------|---|------|------|----|-----|---|---------------------------------|--|
| ROAD | SOUTH PARK | 211.B  | LENTINUS            | yearlong | 0 | 0.11 | 0.11 | HH | H/H | 1 | Keep as is                      | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to road open to highway-legal vehicles only (eliminate mixed use) |
| ROAD | SOUTH PARK | 234.A  | BIG DOUG            | yearlong | 0 | 0.4  | 0.4  | M  | L/L | 1 | Keep as is                      | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 237.A  | SCHOOLMARM          | yearlong | 0 | 1    | 1    | M  | L/L | 1 | Convert to ML1 road             | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 237.B  | BROKEN JUG          | yearlong | 0 | 0.5  | 0.5  | M  | L/L | 1 | Change maintenance level to ML1 | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 237.C  | SOFT END            | yearlong | 0 | 1.05 | 1.05 | M  | L/L | 1 | Change maintenance level to ML1 | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 238.A  | DRY LAKE EAST       | yearlong | 0 | 0.7  | 0.7  | M  | L/L | 1 | Keep as is                      | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 243.1A | GOOSE CHASE LOOP    | yearlong | 0 | 1.38 | 1.38 | M  | L/L | 1 | Add seasonal closure            | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 243.2A | SPAGHETTI LIGHTNING | yearlong | 0 | 0.4  | 0.4  | M  | L/L | 1 | Add seasonal closure            | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 243.2B | CRASH & BURN        | yearlong | 0 | 0.41 | 0.41 | M  | L/L | 1 | Add seasonal closure            | Add seasonal closure and convert to trail open to all vehicles   |

|      |            |        |                  |          |   |      |      |   |     |   |                      |  |
|------|------------|--------|------------------|----------|---|------|------|---|-----|---|----------------------|--|
| ROAD | SOUTH PARK | 250.A  | JENNY'S SMOKE    | yearlong | 0 | 0.7  | 0.7  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 261.A  | HILL TOP         | yearlong | 0 | 0.24 | 0.24 | H | H/H | 1 | Keep as is           | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 261.B  | SPRING           | yearlong | 0 | 0.6  | 0.6  | H | H/H | 1 | Keep as is           | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 290.A  | GILLEY           | yearlong | 0 | 0.6  | 0.6  | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 290.B  | ROCK CLIMB       | yearlong | 0 | 0.2  | 0.2  | H | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 360.2E | QUARTZ           | yearlong | 0 | 0.2  | 0.2  | H | L/L | 1 | Decommission         | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 393.2D | TOMPKINS         | yearlong | 0 | 0.5  | 0.5  | M | L/L | 1 | Decommission         | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 393.2F | GULCH TO RIMROCK | yearlong | 0 | 0.5  | 0.5  | M | L/L | 1 | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 423.A  | DOG HAIR         | yearlong | 0 | 1.1  | 1.1  | H | H/H | 1 | Add seasonal closure | Identify and implement appropriate, targeted road maintenance techniques to minimize areas of watershed impacts, add seasonal closure, and convert to trail open to all vehicles |

|      |            |        |              |          |   |      |      |   |     |     |                      |  |
|------|------------|--------|--------------|----------|---|------|------|---|-----|-----|----------------------|--|
| ROAD | SOUTH PARK | 431.2D | END          | yearlong | 0 | 0.1  | 0.1  | H | H/H | 1   | Add seasonal closure | Add seasonal closure and convert to trail open to all vehicles   |
| ROAD | SOUTH PARK | 433.2A | NORTH SPRING | yearlong | 0 | 1.03 | 1.03 | H | H/H | 1   | No data              | Reinforce/harden stream crossing, make temporary seasonal closure permanent, and convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 436.1A | FORK         | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1   | Add seasonal closure | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 56.3B  | 56.3B        | yearlong | 0 | 0.18 | 0.18 | H | L/L | 3   | Add seasonal closure | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 704.B  | ST. JOE      | yearlong | 0 | 0.2  | 0.2  | M | L/L | 1   | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 752.A  | 4 POINT      | yearlong | 0 | 0.7  | 0.7  | M | L/L | 1   | Keep as is           | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 801.A1 | WATERWORKS   | No data  | 0 | 1.1  | 1.1  | H | L/H | 101 | Decommission         | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 809.B  | HALFWAY      | yearlong | 0 | 0.2  | 0.2  | H | L/H | 1   | Add seasonal closure | Convert to trail open to all vehicles  |
| ROAD | SOUTH PARK | 809.C  | BAKER LAKE   | yearlong | 0 | 0.5  | 0.5  | H | L/H | 1   | Add seasonal closure | Make temporary seasonal closure permanent and convert to trail open to all vehicles                                    |

|      |            |       |                      |          |   |      |      |   |     |   |            |                                       |
|------|------------|-------|----------------------|----------|---|------|------|---|-----|---|------------|---------------------------------------|
| ROAD | SOUTH PARK | 860.B | REC VEHICLES         | yearlong | 0 | 0.08 | 0.08 | H | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 873.A | FAKE FIRE            | yearlong | 0 | 0.1  | 0.1  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 873.B | Y SPUR NW            | yearlong | 0 | 0.1  | 0.1  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 873.C | Y SPUR SE            | yearlong | 0 | 0.1  | 0.1  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 896.A | BOOMERANG            | yearlong | 0 | 1.1  | 1.1  | M | L/L | 1 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 96.B  | O BRIEN PG           | yearlong | 0 | 0.1  | 0.1  | H | L/H | 3 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 96.C  | ELEVENMILE CANYON PG | yearlong | 0 | 0.1  | 0.1  | H | L/H | 3 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 96.D  | MESSENGER GULCH PG   | yearlong | 0 | 0.1  | 0.1  | H | L/H | 3 | Keep as is | Convert to trail open to all vehicles |
| ROAD | SOUTH PARK | 96.H  | IDLEWILDE PG         | yearlong | 0 | 0.1  | 0.1  | H | L/H | 3 | Keep as is | Convert to trail open to all vehicles |

|      |              |       |                     |          |      |      |      |   |     |    |   |   |
|------|--------------|-------|---------------------|----------|------|------|------|---|-----|----|---|---|
| ROAD | SOUTH PARK   | 96.J  | ELEVENMILE FISHING  | yearlong | 0    | 0.12 | 0.12 | H | L/H | 1  | Keep as is                                | Convert to trail open to all vehicles   |
| ROAD | SOUTH PLATTE | 102   | ELK CREEK           | yearlong | 0.17 | 0.41 | 0.24 | M | L/L | 3  | Convert to special use permit only road   | Convert to trail open to all vehicles   |
| ROAD | SOUTH PLATTE | 107   | LIMBER PINE         | yearlong | 0    | 0.83 | 0.83 | M | L/L | 1  | No data                                   | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PLATTE | 121   | HANDCART GULCH      | yearlong | 0    | 5    | 5    | H | H/H | 1  | Keep as is                                | Increase maintenance interval/techniques, reinforce/harden stream crossing, add seasonal closure, and convert to trail open to all vehicles |
| ROAD | SOUTH PLATTE | 809   | WAHL                | yearlong | 3.14 | 3.43 | 0.29 | H | L/L | 1  | Add seasonal closure                      | Convert to trail open to all vehicles   |
| ROAD | SOUTH PLATTE | 126.C | KENOSHA CREEK SPUR  | yearlong | 0    | 0.13 | 0.13 | H | L/L | 3  | Add seasonal closure                      | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PLATTE | 300.M | TOPAZ POINT PG      | yearlong | 0    | 0.05 | 0.05 | H | L/L | 3  | Add seasonal closure                      | Add seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PLATTE | 300.R | CABIN RIDGE PG      | seasonal | 0    | 0.25 | 0.25 | H | L/L | 12 | Make temporary seasonal closure permanent | Revise existing seasonal closure and convert to trail open to all vehicles  |
| ROAD | SOUTH PLATTE | 300.S | FLAT ROCKS OVERLOOK | seasonal | 0    | 0.1  | 0.1  | H | L/L | 12 | Make temporary seasonal closure permanent | Revise existing seasonal closure and convert to trail open to all vehicles  |

|      |              |       |                   |          |   |      |      |   |     |    |   |  |
|------|--------------|-------|-------------------|----------|---|------|------|---|-----|----|---|--|
| ROAD | SOUTH PLATTE | 300.U | SUNSET POINT      | seasonal | 0 | 0.06 | 0.06 | H | L/L | 12 | Make temporary seasonal closure permanent | Revise existing seasonal closure and convert to trail open to all vehicles |
| ROAD | SOUTH PLATTE | 528.F | GUNBARREL EAST    | yearlong | 0 | 0.2  | 0.2  | H | L/L | 3  | Keep as is                                | Convert to trail open to all vehicles                                      |
| ROAD | SOUTH PLATTE | 528.G | KELSEY GRAVEL PIT | yearlong | 0 | 0.11 | 0.11 | H | L/L | 3  | Keep as is                                | Convert to trail open to all vehicles                                      |

302.82