USDA Forest Service

Rocky Mountain Regional Office

Attn: Objection Reviewing Officer

PO Box 18980

Golden, CO 80402

Submitted electronically via [https://cara.ecosystem-management.org/Public//CommentInput?Project=48214](https://cara.ecosystem-management.org/Public/CommentInput?Project=48214)

Re: Objection to Pike & San Isabel National Forests Motorized Travel Management (MVUM) Analysis

To Objection Reviewing Officer:

Objectors Wild Connections and Central Colorado Wilderness Coalition (CCWC) file the following objection to the Pike & San Isabel National Forests Motorized Travel Management proposed project (Project), Final Environmental Impact Statement (FEIS), draft Record of Decision (DROD) and Forest Plan Amendment, noticed November 6, 2020. Diana Trujillo, Pike & San Isabel Forest Supervisor, Responsible Official.

Wild Connections and CCWC submitted comments regarding this project and covering the route-specific points raised in this objection on November 4, 2019. We have standing to object, and our objections pertain to the substantive issues that we raised during scoping and in our comments on the project’s draft EIS.

As required by 36 C.F.R. § 218.8(d), the lead objector is as follows:

James E. Lockhart

President, Wild Connections

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We submit the following objections and proposed resolutions. The overall themes of the objections are that the particular motorized routes discussed in each objection issue intrude into wilderness quality land or unduly impact important wildlife habitat and wildlife corridors.

**Objection Issue Title:** Three road segments: Road 300.C PLUM CREEK segment from 0 to 1.767, Road 300.CA UNIT C segment from 0 to 0.83, and Road 300.CB UNIT F segment from 0 to 0.675.

* **Issue Summary**: Road 300.C should be decommissioned as it enters and lines the Rampart East Roadless Area as a cherry stem road. Roads 300.CA, 300.CB branch off of 300.C and also dead-end into the Rampart East Roadless Area, also a Wild Connections proposed wilderness area.
	+ Additionally this roadless area is the only intact wildlife habitat in the area, which is otherwise surrounded on all sides by roads or development.
	+ This route also is surrounded by MSO Recovery Habitat as shown on the biological assessment maps.
	+ Closure of 300C (and 327 referenced below) would provide complete intact habitat in this section of the Rampart East Roadless Area and would keep all motorized west of Rampart Road.
* **Routes Affected:** Road 300.C PLUM CREEK segment from 0 to 1.767, Road 300.CA UNIT C segment from 0 to 0.83, and Road 300.CB UNIT F segment from 0 to 0.675 in the Pikes Peak Ranger District.
* **Proposed Resolution**: Decommission Road 300.C PLUM CREEK segment from 0 to 1.767, Road 300.CA UNIT C segment from 0 to 0.83, and Road 300.CB UNIT F segment from 0 to 0.675.

**Objection Issue Title:** Road 327 GOVE CREEK segment from 0 to 1.85.

* **Issue Summary**: This road enters nearly two miles into the Rampart East Roadless Area as a cherry stem road and dead-ends.
	+ Closure of Road 327 (and 300C) would provide complete intact habitat in this section of the Rampart East Roadless Area and would keep all motorized west of Rampart Road.
	+ Route 327 has a TAP rating for watershed risk that is high and a benefit that is low. Closure of this road to "Administrative Use" would be beneficial to the watershed of the roadless area and to wildlife.
	+ This route also is surrounded by MSO Recovery Habitat as shown on the biological assessment maps.
* **Routes Affected:** Road 327 GOVE CREEK segment from 0 to 1.85 in the Pikes Peak Ranger District.
* **Proposed Resolution**: Decommission Road 327 GOVE CREEK segment from 0 to 1.85 in the Pikes Peak Ranger District.

**Objection Issue Title:** Two road segments, Bull Park, 376.A from 0 to 0.42 and Bull Park 376.A from 0.42 to 2.190, Pikes Peak Ranger District.

* **Issue Summary**: For both 376.A road segments, Wild Connections’ 2019 comments for the Draft Environmental Impact Statement (DEIS) were in support of Alternative E recommended restrictive road designations. The PSI Final Environmental Impact Statement recommends changing to seasonal closure and converting the road to trail open to all vehicles. We object to these changes. For the following reasons, Wild Connections supports converting 376.A to Trail Non-motorized designation.
* **Routes Affected:**
	+ **Motorized Trespass from 376.A into the Colorado Springs South Slope Watershed.** Several times over a number of years, we have observed the watershed boundary fence cut just north of 376.A. Each time evidence of motorized activity appeared beyond the fence in the restricted watershed. The FEIS Alt. C changes to open to all vehicles might foster more of the same motorized trespass.
		- The FEIS has identified 376.A not only as a site of potential conflict among different vehicles classes, but also one of potential vehicle conflict creating unsafe conditions for recreationists.
		- **Wild Connections Conservation Plan Recommended Wilderness Area: Pikes Peak West.** The recommended Wilderness area, Pikes Peak West, includes National Forest land west and south of Pikes Peak and most of the Pikes PeakWest Colorado Roadless Area. The proposed change to open to all vehicles invites motorized intrusion from the 367 A. into the recommended Wilderness and roadless area. The Central Colorado Wilderness Coalition (CCWC) Wild 11 also recommends Pike Peak West as Wilderness.
	+ **Road 376.A BULL PARK segment from 0 to 0.42**
		- This route segment crosses designated cutthroat trout aquatic habitat identified as Restricted Surface Occupancy by the Colorado Oil and Gas Conservation Commission.
		- This route segment crosses the Pikes Peak Potential Conservation Area possessing outstanding biodiversity significance and the South Slope Potential Conservation Area with very high biodiversity significance identified by the Colorado Natural Heritage Program.
		- **Ring the Peak Trail** The 376.A route segment has long been a present and probable future link in completing the Ring the Peak Trail. The objective of the trail is to provide non-motorized recreation opportunities. A Non-motorized trail designation for 376.A would be a benefit for the trails future.
	+ **Road 376.A BULL PARK segment from 0.42 to 2.61**
		- This route segment crosses the Pikes Peak Potential Conservation Area outstanding biodiversity significance and the South Slope Potential Conservation Area with very high biodiversity significance identified by the Colorado Natural Heritage Program.
		- The FEIS has identified Bull Park’s significant wetland values. Unfortunately, areas such as Bull Park, easily reached by vehicles, have become targets for mud bogging and are in need of special protection. An example of vehicle targeted destruction is in the South Platte Ranger District, Pine Creek headwaters wetland in the Green Mountain roadless area. The deadend route, similar to 376.A , has now been decommissioned and the wetland well on its way to restoration.
		- This route segment crosses a winter concentration area for bighorn sheep according to Colorado Parks and Wildlife Species Activity Mapping.
* **Proposed Resolution**: Designate 376.A as a Non-motorized Trail and restore deteriorated portions of the current route.

**Objection Issue Title:** Trail 1411 PASS CREEK segment from 0 to 3.347.

* **Issue Summary**: This route should be closed to motorized use for several reasons.
	+ The trail follows Pass Creek high into its headwaters under the Continental Divide, with impacts to water quality and riparian areas, and is one of several trails/roads that enters and dead-ends into the Chipeta Colorado Roadless Area, also a Wild Connections identified Roadless Area.
	+ This route segment crosses the Pahlone Slopes Potential Conservation Area with very high biodiversity significance identified by the Colorado Natural Heritage Program.
	+ This route segment crosses production area, summer concentration area, and winter range for bighorn sheep, production area and winter concentration area for elk according to Colorado Parks and Wildlife Species Activity Mapping.
	+ This route segment crosses lynx habitat for almost its entire length.
* **Routes Affected:** Trail 1411 PASS CREEK segment from 0 to 3.347 in the Salida Ranger District.
* **Proposed Resolution**: Trail 1411 PASS CREEK segment from 0 to 3.347 should be closed to motorized use.

**Objection Issue Title:** Trail 1436 POPLAR GULCH segment from 0 to 6.12.

* **Issue Summary**: This trail should be converted to a non-motorized trail for the following reasons.
	+ The trail bisects the large Kreutzer-Princeton roadless area and goes across the high tundra ridge, with impacts to alpine vegetation.
	+ This trail segment crosses the Middle and South Cottonwood Creeks Potential Conservation Area with outstanding biodiversity significance identified by the Colorado Natural Heritage Program.
	+ This trail segment crosses migration patterns and summer concentration areas for bighorn sheep according to Colorado Parks and Wildlife Species Activity Mapping.
	+ This trail crosses lynx habitat for almost its entire length through conifer forests and open areas at the north and south ends, and over the High Kreutzer-Princeton ridge.
* **Routes Affected:** Trail 1436 POPLAR GULCH segment from 0 to 6.12 in the Salida Ranger District.
* **Proposed Resolution**: Convert Trail 1436 POPLAR GULCH segment from 0 to 6.12 to a non-motorized trail.

**Objection Issue Title:** Trail 1437 POMEROY LAKES segment from 0 to 0.85.

* **Issue Summary**: This route should be closed to motorized use as it extends the existing Road 297 cherry stem road to Lower Pomeroy Lake, causing unnecessary riparian damage and wildlife disturbance.
* **Routes Affected:** Trail 1437 POMEROY LAKES segment from 0 to 0.85 in the Salida Ranger District.
* **Proposed Resolution**: Convert Trail 1437 POMEROY LAKES segment from 0 to 0.85 to a non-motorized trail.

**Objection Issue Title:** Trail 1314 CISNEROS segment from 5.21 to 11.13 San Carlos District.

* **Issue Summary**: Wild Connections’ 2019 comments for the Draft Environmental Impact Statement (DEIS) recommended decommissioning this trail, as proposed under Alternative E of the DEIS. For the following reasons, Wild Connections supports decommissioning this trail or at the very least, imposing a seasonal closure to match the current seasonal closure of Road 409.
	+ This route segment crosses severe winter range and production area for elk and production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ This route segment crosses Mexican spotted owl designated critical habitat.
	+ Traveling this route in a loop would require motorcycles and ATVs to return via Road 409, a road which is subject to an existing seasonal closure.  We note also that the starting point for this segment, Road 469 is currently subject to a seasonal closure and that the preferred alternative would extend the closure point and impose additional seasonal closures on other roads along the top of the Wet Mountain Range.
* **Routes Affected**
	+ Trail 1314 CISNEROS from 5.21 to 11.13 in the San Carlos Ranger District
		- **Wild  Connections Conservation Plan Recommended Wilderness Area:  Pikes Peak West.**The recommended Wilderness area, Pikes Peak West, includes National  Forest land west and south of Pikes  Peak and most of the Pikes Peak West Colorado Roadless Area.  The proposed change to open to all vehicles invites motorized intrusion  from the 367 A. into the recommended Wilderness and roadless area. The Central Colorado Wilderness Coalition (CCWC) Wild 11 also recommends Pike Peak West as Wilderness.
		- **Wild  Connections Conservation Plan Recommended Wilderness  Area:** This is a motorized trail in a roadless area; bisects the Wild Connections Cisneros Creek proposed wilderness area then continues into Williams Creek, a proposed wildlife management area.
* **Proposed Resolution**: Decommission 1314 and obliterate the current route or seasonally close it during the same period that Road 409 is proposed for closure.

**Objection Issue Title:** Trail segment 1321 SOUTH CREEK from 3.19 to 5.68 in the San Carlos Ranger District

* **Issue Summary**: We object to the Alt C designation keeping Trail 1321 open to motorcycles which would cause unacceptable impacts to wildlife and water resources, as well as cause potential increased illegal motorized use in Pueblo Mountain Park.
	+ This route segment crosses an area identified as a black-footed ferret release site.
	+ This route segment crosses Mexican spotted owl designated critical habitat.
	+ This route segment crosses a fall concentration area for black bear, a production area for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ This route segment crosses within 300 feet of a Public Water System Protection Area as designated by the Colorado Oil and Gas Conservation Commission.
	+ This route has no legal motorized access/outlet on east side at private land or Pueblo Mountain Park, where all trails are closed to motorized use. Allowing motorized travel on this trail segment increases illegal motorized use of Pueblo Mountain Park trails with the associated increased potential for user conflicts and trail maintenance and management issues.
* **Routes Affected:** Trail 1321 SOUTH CREEK segment from 3.19 to 5.68 in the San Carlos Ranger District.
* **Proposed Resolution**: Close Trail 1321 SOUTH CREEK segment from 3.19 to 5.68 and 321.S to non-motorized use.

**Objection Issue Title:** Two trail segments: Trail segments 1322 SECOND MACE: segment from 0 to 2.98 and segment from 2.98 to 4.95 in the San Carlos Ranger District.

* **Issue Summary**: We object to the Alt C designation keeping Trail 1322 segments open to ATVs and motorcycles which would cause unacceptable impacts to wildlife and water resources.
	+ These route segments cross an area identified as a black-footed ferret release site.
	+ These route segments cross Mexican spotted owl designated critical habitat.
	+ These route segments cross a fall concentration area for black bear, a production area .for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ These route segments are within half a mile of a Public Water System Protection Area as designated by the Colorado Oil and Gas Conservation Commission.
* **Routes Affected:** Trail 1322 SECOND MACE segment from 0 to 2.98 and segment from 2.98 to 4.95 in the San Carlos Ranger District.
* **Proposed Resolution**: These two route segments should be closed to motorized use, or at least have a seasonal wildlife closure similar to the only other road in the area.

**Objection Issue Title:** Two trail segments: Trail 1323 SILVER CIRCLE segment from 0 to 2.82 and segment from 2.82 to 4.32.

* **Issue Summary**: We object to the Alt C designation keeping Trail 1323 segments open to ATVs and motorcycles which would cause unacceptable impacts to wildlife and water resources.
	+ These route segments cross an area identified as a black-footed ferret release site.
	+ These route segments cross Mexican spotted owl designated critical habitat.
	+ These route segments cross a fall concentration area for black bear, a production area for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ These route segments cross within half a mile of a Public Water System Protection Area as designated by the Colorado Oil and Gas Conservation Commission.
* **Routes Affected:** Trail 1323 SILVER CIRCLE segment from 0 to 2.82 and segment from 2.82 to 4.32 in the San Carlos Ranger District.
* **Proposed Resolution**: These routes should be closed to motorized use, or at least have a seasonal wildlife closure similar to the only other road in the area.

**Objection Issue Title:** Trail 1325 LEFT HAND segment from 0 to 2.05 in the San Carlos Ranger District.

* **Issue Summary**: We object to the Alt C designation keeping Trail 1325 open to ATVs and motorcycles which would cause unacceptable impacts to wildlife.
	+ This route segment crosses Mexican spotted owl designated critical habitat.
	+ This route segment crosses a fall concentration area for black bear, a production area for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
* **Routes Affected:** Trail 1325 LEFT HAND segment from 0 to 2.05 in the San Carlos Ranger District
* **Proposed Resolution**: This route should be closed to motorized use, or at least have a seasonal wildlife closure similar to the only other road in the area.

**Objection Issue Title:** Trail 1384 SQUIRREL CREEK segment from 1.63 to 4.82.

* **Issue Summary**: We object to the Alt C designation keeping Trail 1323 segments open to ATVs and motorcycles which would cause unacceptable impacts to wildlife and water resources, as well as cause potential increased illegal motorized use in Pueblo Mountain Park.
	+ This route segment crosses an area identified as a black-footed ferret release site.
	+ This route segment crosses Mexican spotted owl designated critical habitat.
	+ This route segment crosses a fall concentration area for black bear, a production area for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ This route segment crosses within half a mile of a Public Water System Protection Area as designated by the Colorado Oil and Gas Conservation Commission.
	+ This route has no legal motorized access/outlet on east side due to near proximity to private land or Pueblo Mountain Park, where all trails are closed to motorized use. Allowing motorized on this trail segment increases illegal motorized use of Pueblo Mountain Park trails with the associated increased potential for user conflicts and trail maintenance and management issues.
* **Routes Affected:** Trail 1384 SQUIRREL CREEK segment from 1.63 to 4.82 in the San Carlos Ranger District.
* **Proposed Resolution**: This route should be closed to motorized use, or at least have a seasonal wildlife closure similar to the only other road in the area.

**Objection Issue Title:** Two trail segments: Trail 1387 DOME ROCK segment from 0 to 1.02 and segment from 1.02 to 2.37.

* **Issue Summary**: We object to the Alt C designation keeping Trail 1387 segments open to motorcycles which would cause unacceptable impacts to wildlife and water resources.
* **Routes Affected:** Trail 1387 DOME ROCK segment from 0 to 1.02 and segment from 1.02 to 2.37 in the San Carlos Ranger District.
	+ These route segments cross an area identified as a black-footed ferret release site.
	+ These route segments cross Mexican spotted owl designated critical habitat.
	+ These route segments cross a fall concentration area for black bear, a production area for elk and a production area for wild turkey according to Colorado Parks and Wildlife Species Activity Mapping.
	+ Route segment 1.02 to 2.37 crosses within 500 feet of a Public Water System Protection Area as designated by the Colorado Oil and Gas Conservation Commission.
* **Proposed Resolution**: This route should be closed to motorized use, or at least have a seasonal wildlife closure similar to the only other road in the area.

**Objection Issue Title:** Six route segments: 44, 44.2B, 44.2C, 280, 227, and 229.

* **Issue Summary:** The US Forest Service South Park Ranger District closed these
routes or a segment of these routes in September 2020 for protection of sensitive
raptors in the area.
Golden Eagles, Bald Eagles and American Peregrine Falcons that frequent the cliffs
near the Pass have had declining populations, which have likely been adversely
affected by human presence and noise from motorized traffic on these duplicative
routes.
Routes Affected: Routes 44, 44.2A, 44.2B, 44.2C, 280, 227, and 229 in the South Park
Ranger District.

**Proposed Resolution**: The Resolution should be consistent with recent on the ground USFS closures and administrative-only uses. This area has been previously analyzed and planning is being implemented as part of the Badger Flats Management Plan.

We are submitting this objection primarily in full support of the proposed actions regarding these routes set forth in the Decision Notice for the Badger Flats Management Plan <https://www.fs.usda.gov/project/?project=48069>, and to note that in some instances the described routes have been decommissioned and restored or converted to administrative use. We would like to be able to participate in any objection resolution discussions or proceedings regarding these routes and others within the Badger Flats project area that may occur, and to preserve our status in any future proceedings that may occur regarding these routes.

 **Objection Issue Title:** Route segments 540, 220, 220.A, 220.B, and 221 in Wildcat Canyon

* **Routes Affected:** Routes 540, 220, 220.A, 220.B, and 221in South Platte and South Park Ranger Districts.
* **Issue Summary**:
* The Draft Decision fails to specify the methods and timing used for decommissioning these routes and lacks a specific implementation plan or schedule for this decision that could prioritize these and other routes for decommissioning. We are signatories to the objections raised by Quiet Use Coalition and allied organizations and submitted on this date, setting forth grounds for this objection in full.
* The decommissioning of these routes was originally proposed under the 2004 Hayman Roads Travel Management Plan. The Hayman Plan has been partially implemented over the years with installation of signage, post and cable fencing, and locked gates, all of which has been removed or ignored by motorized recreationists, leading to a false assumption that these roads are open.  Hard closure of these routes is necessary to protect the wildlife, their critical habitat and the resources found in the area, also to protect Denver's water supply in the South Platte River, and to preserve the significant wilderness character of Wildcat Canyon.
* **Proposed Resolution**: An implementation plan for Wildcat Canyon should be developed, which should prioritize decommissioning and other implementation actions based on the risks they pose to environmental resources and public safety

We are submitting this objection primarily in full support of the proposed actions regarding these routes set forth in the Draft Decision. Wild Connections would like to be able to participate in any objection resolution discussions or proceedings regarding these routes and others within the Badger Flats project area that may occur, and to preserve our status in any future proceedings that may occur regarding these routes.

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