

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

Supplement to Objection #31 on NFSR 348 Hope Gulch

Submitted on behalf of Colorado Offroad Enterprise and Patrick McKay
December 21, 2020

Project Name: Pike & San Isabel National Forests Motorized Travel Management (MVUM) Analysis

Project ID: 48214

Responsible Official: Diana M. Trujillo, PSICC Forest and Grasslands Supervisor

Affected National Forest Units: Pike & San Isabel National Forests (Leadville, Pikes Peak, South Platte, South Park, Salida, & San Carlos Ranger Districts)

Dear Objection Reviewing Officer:

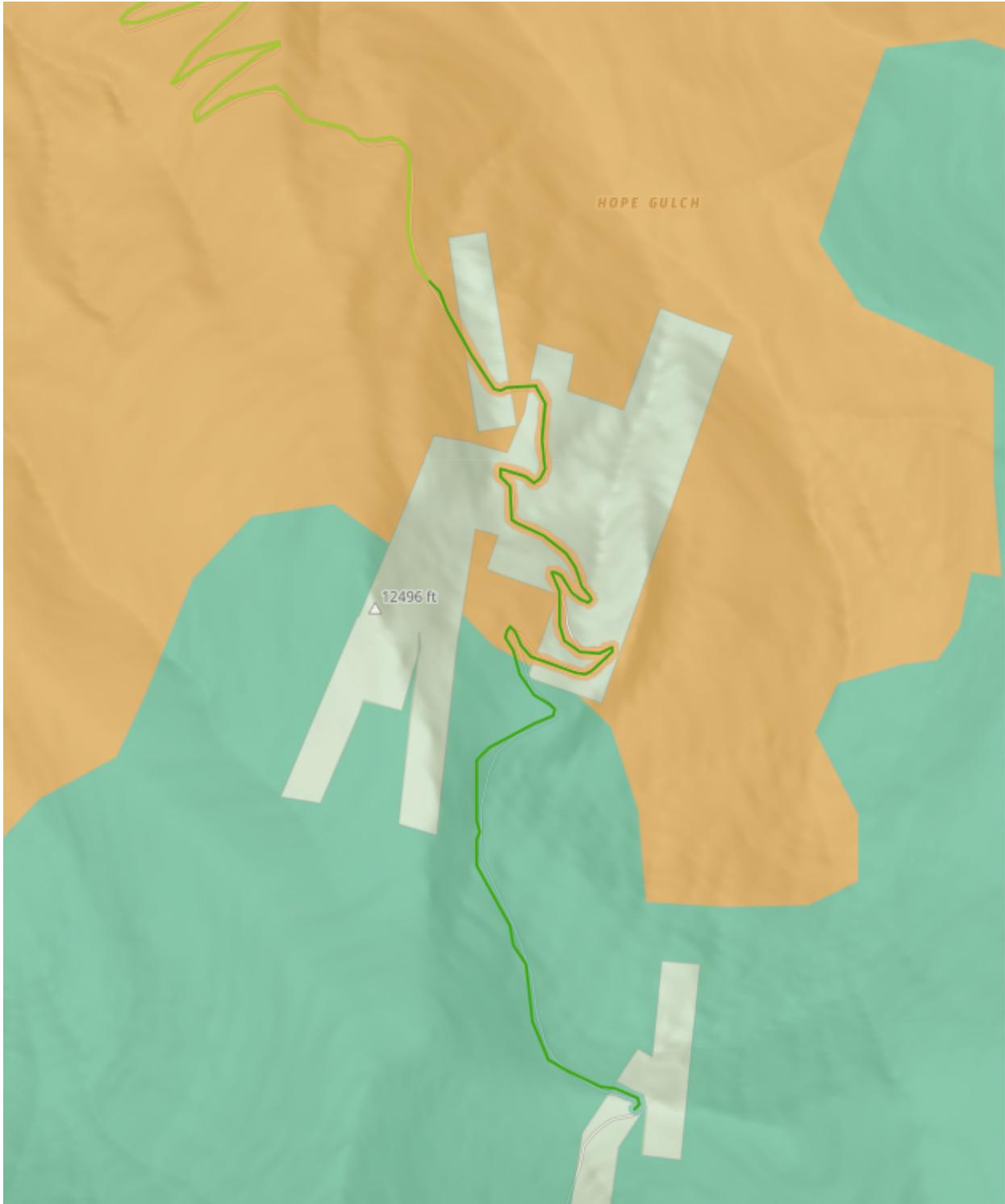
Please accept this supplement to the joint objections regarding the “Pike & San Isabel National Forests Motorized Travel Management (MVUM) Analysis” on behalf of Colorado Offroad Enterprise (CORE), as well as CORE Advisory Board Member Patrick McKay as an individual. Our main objections were filed on December 20, 2020.

This supplement concerns **Objection #31 on NFSR 348 Hope Gulch 4WD**, regarding a serious mapping error in the maps for the Draft ROD which shows that road ending at 2.65 miles rather than at 5.1 miles as listed in the tabular data for the FEIS and Appendix A of the DROD. We discussed the fact that the maps and GIS data for Alternative A (No Action) shows this route ending at the saddle of the ridge at a private cabin. The maps for the action alternatives, including the chosen Alternative C, show it ending halfway down the mountain at the boundary of a parcel of private land. In actuality, the road continues across this private land and re-enters the National Forest before climbing to a saddle at the top of the ridge. The maps for Alternative A shows it ending at another parcel of private land at the crest of the ridge where there is a private cabin immediately adjacent to the road.

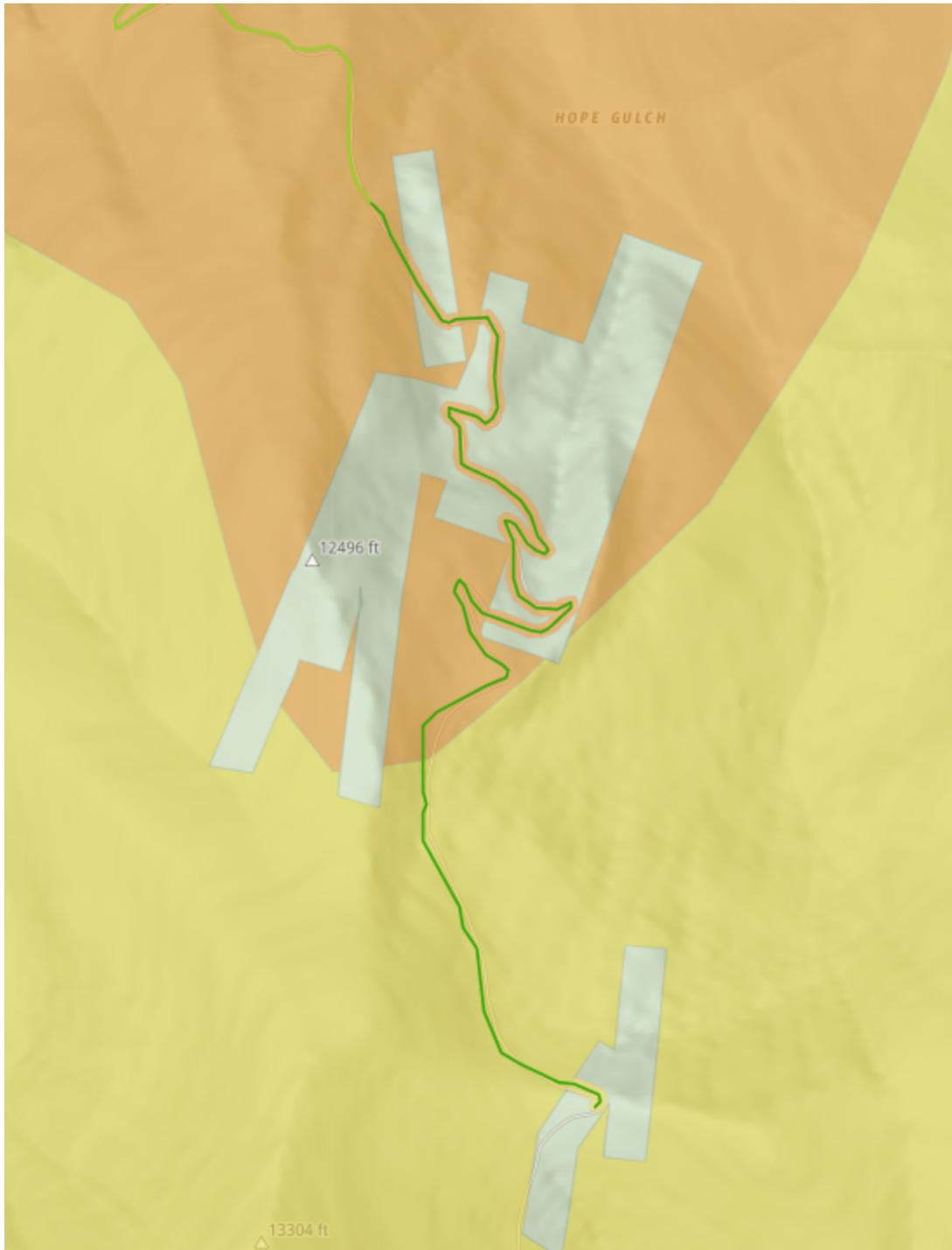
In support of our contention that the maps and GIS data for Alternative A reflect the proper alignment and endpoint of this route rather than the current MVUM and action alternative maps, we offer the following two additional maps as evidence. Both of these maps were created from the GIS data supplied by the Forest Service for the DEIS and FEIS, plotted in ArcGIS.

The following map shows NFSR 348 plotted against the Forest Plan Management Area boundaries GIS layer. The light green line is the route as shown in the Alternative C GIS data, while the dark green line shows the remainder of the route from the Alternative A GIS data. The orange polygon is the 9B management area, and the teal polygon is the 4B management area.

Note how both the 9B and 4B management areas are specifically drawn to follow the road through the private parcels (no dark color shading), and how the 4B area has a small extension ending at the endpoint of the Alternative A line for the route.



The following map shows the ROS (Recreation Opportunity Spectrum) areas for the last portion of this route. Orange is the Roded Natural ROS area, while yellow is the Semi-Primitive Motorized ROS area. Again these ROS areas are drawn to follow the road as depicted in Alternative A, and end where it ends by the cabin at the high point of the route.



While we argue that the switchback a bit further down the road is a better endpoint, the fact that both the Management Areas and ROS Areas in the Forest Plan were specifically drawn around this road and coincide exactly with the Alternative A mapping of this route are further evidence

that this mapping is correct. Management Areas and ROS Areas in the Forest Plan by definition can only apply to Forest Service land, and would not apply to private land. As a result, the remainder of the private parcels shown in these map views are excluded from the MA and ROS polygons. The fact that the land immediately around the roadbed of NFSR 348 has Forest Service MA and ROS areas drawn around and following it is conclusive evidence that the entire roadbed is under Forest Service jurisdiction and it is not a private road. It also shows that at least at the time these MA and ROS areas were mapped, the full length of NFSR 348 as shown in the Alternative A GIS data was considered a Forest Service Road.

Because Alternative A is supposed to be based on the 2010 MVUM which forms the baseline route inventory for this travel management process, and because the Forest Plan Management Areas and ROS areas also match the Alternative A endpoint, this clearly is the correct length of this route. The fact that the tabular data in both the FEIS and the Draft ROD Appendix A lists the endpoint as 5.1 miles, which matches approximately where the route is shown ending in the Alternative A maps, further supports this point. Finally, the fact that Alternative C does not purport to effect a change to this route's length or designation and does not show the second half of the route as being closed to public use, but is listed in the tabular data as making a seasonal closure change only, also supports the fact that no change to the length of this route was intended as compared to the 2010 MVUM baseline route represented in the Alternative A maps.

The current MVUM and the maps for the action alternatives do not reflect the proper endpoint of this route and are clearly in error. If the endpoint is changed to match the maps for Alternative C, the resulting shortening of this route by half will not have been the product of an intentional or informed agency decision as required by NEPA and the Administrative Procedure Act. It would therefore be arbitrary and capricious.

Based on this additional evidence, we reiterate our request that the Reviewing Officer affirm **Objection #31** as fully laid out in our main objections document, and that the Supervisor of the Pike San Isabel National Forest be directed to correct this mapping error in the Final ROD by designating NFSR 348 as open to public motorized use at least to the endpoint shown in the Alternative A maps, if not slightly farther.

Thank you for your consideration.

Patrick McKay, Esq., Lead Objector