

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)

**P.O. Box 5295
Helena, MT 59604-5295**

March 8, 2023

Leadville District Ranger
Pike-San Isabel National Forests
810 Front Street,
Leadville, CO 80461
<https://www.fs.usda.gov/project/?project=60591>

Re: Comments for Dispersed Camping Management, Leadville and Salida Ranger Districts #60591

Dear Management Team,

We have assembled the following information and issues from our members and other recreationists for the project record. We appreciate the opportunity to provide our comments on dispersed camping in the Leadville and Salida Ranger Districts. We enjoy dispersed camping on our public lands. All multiple-use land managed by the agency provides a significant source of these recreational opportunities. Moreover, the pandemic has reconnected visitors to our public lands as a critical way to counter the stresses of ever day life. Most of these visitors are looking for multiple-use activities including dispersed camping. We are passionate about dispersed camping for the following reasons:

Enjoyment and Rewards of Camping and Dispersed Camping

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in healthy and enjoyable outdoor experiences.
- Opportunity to experience a variety of opportunities and challenges.
- Camaraderie and exchange of experiences.
- For the adventure of it.

Acknowledged Responsibilities of Camping and Dispersed Campers

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.

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- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible dispersed camping on public lands.

Dispersed camping opportunities supports many different visitor interests. Supporting dispersed camping is the best way to support diversity of uses and multiple-use. This over-arching fact should be adequately addressed in the purpose and need and adequately considered in the analysis and decision. We are representative of the needs of most visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc.

Our position is that the number of existing dispersed camping sites does not adequately meet the needs discussed above. The public would greatly benefit from continued management for multiple-uses including an enhanced system of dispersed camp sites. The pandemic has brought visitors back to our public lands and 98% of them are looking for dispersed camp sites and multiple-use activities. Therefore, we oppose the closure of any dispersed camping opportunities. We strongly support the development of a Pro-Recreation Alternative.

We understand that the Management Team is under pressure from those opposed to dispersed camping opportunities. We have experienced the vast closure of motorized access and dispersed camping opportunities that have gone far beyond reasonable and justifiable decisions because of that influence. We ask the Management Team to review the attached significant issues and work on refinements to the analysis and plan that would adequately address and mitigate these significant issues. We ask the Management Team to use these comments and information as support and justification for more dispersed camping opportunities.

We are looking forward to reviewing to your consideration of these significant issues and your use of them to develop a reasonable Pro-Recreation Alternative.

Thank you for considering our comments and issues.

Sincerely,

/s/ CTVA Action Committee on behalf of our 240 members and their families and friends
Capital Trail Vehicle Association (CTVA)
P.O. Box 5295
Helena, MT 59604-5295

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1 ADEQUATELY ADDRESS THE IMPACTS ON AND BENEFITS OF MOTORIZED RECREATION ON THE HUMAN ENVIRONMENT

1. The agency should adequately consider that the human environment needs significantly more positive experiences.
2. The agency should adequately consider that use of the existing network of motorized roads and trails is part of our culture and pioneer heritage and traditions which all rely on adequate access to the land.
3. The agency should adequately consider that historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners are important cultural resources for motorized recreationists and must be protected.
4. The agency should adequately consider that the public looks forward to retirement and being able to enjoy using OHVs in many different states and places but now we find that an excessive amount of those places has been closed to us and our retirement experience has been significantly impacted by inadequate consideration by the agency.
5. The agency needs to implement readily-available user-friendly visitor maps in both paper and digital formats in order to expect the public to follow the current land use planning. See <https://drive.google.com/file/d/1jMOc-Wrb5LR58qVj28lud-fvaY0QjCKH/view> for a good example of a user-friendly map.
6. The agency needs to adequately consider that all of the motorized closures to date have eliminated a significant number of our happy places which has significantly impacted the quality of life and the human environment.
7. The agency should conduct the scoping process so that all significant issues relating to human environment including the significant impact of motorized closures are identified for adequate and reasonable evaluation.
8. The agency should adequately consider that motorized recreationists have been under-served during the past 40 years.

1.1 HUMAN ENVIRONMENT AND MENTAL HEALTH CRISIS

1. The agency should adequately consider that supporting the human environment is an important function of our public lands and must be considered equally in management actions.
2. The agency's management plan should adequately recognize that humans and their needs are different and diverse.

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3. The nation is in a mental health crisis as demonstrated by Sandy Hook, Buffalo, Uvalde, and more.
 - a. We need more positive mental health activities for everyone including youth and elders.
 - b. OHV recreation is a positive mental health activity.
 - c. Everyone needs to learn how to share public lands so that we all have adequate recreational opportunities.
 - d. We all need to do our part by sharing and creation of opportunities in order to address this problem.
4. The agency should adequately consider the significant impact that suicides are having on the nation.
5. The agency should adequately consider that the significant closing of motorized routes in the project area should meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities".
6. The agency should adequately consider that a healthy human environment includes adequate motorized access and motorized recreational opportunities as required to meet the needs of the public.
7. The agency should adequately recognize its propensity to reduce motorized access and motorized recreational opportunities and that this partiality is contrary to the needs of the public.
8. The agency should adequately consider that the public needs robust access to all forms of recreation for a healthy state of mind including adequate stress relief.
9. The agency should adequately consider the needs of the human environment including recognition of the fact that 97-98% of the visitors to our public lands rely on some form of motorized access and motorized recreation.
10. Motorized recreationists now include e-bike enthusiasts who have been excluded from sharing hiking, walking and mountain bike trails.
11. The agency's project team should adequately consider that NEPA 1969 did not say evaluate natural resources only.
12. The agency should adequately consider the human environment (social, economic, need for recreation, need to address obesity and suicide issues, etc.). NEPA was intended to protect and promote all environments equally. The depth and breadth of analysis of the Human Environment should be equal to that of the Natural Environment.
13. The agency should adequately consider the needs of the human environment. The public needs more not less motorized access and motorized recreational opportunities including dispersed camping. The pandemic has demonstrated the significance of this issue and need.
14. The agency should adequately consider that seeking control is a good thing but only up to a point. Beyond that point, the determination to control every little thing can make you miserable. https://greatergood.berkeley.edu/article/item/why_losing_control_make_you_happier
15. The agency should adequately consider an alternative that would maximize recreation opportunities in proportion to the needs of actual visitors to the project area.
16. The agency should adequately address how its large NEPA budget produces significant impacts on the human environment through recreational closures including motorized. The agency should adequately mitigate these impacts and modify its future budgeting process.
17. The agency should adequately consider that mental health needs for youth is at extremely high levels, continues to rise, and needs to be addressed with healthy activities. https://helenair.com/news/state-and-regional/montana-youth-mental-health-needs-on-the-rise/article_c9ad3613-68b8-591d-91fc-5dae86b9b364.html

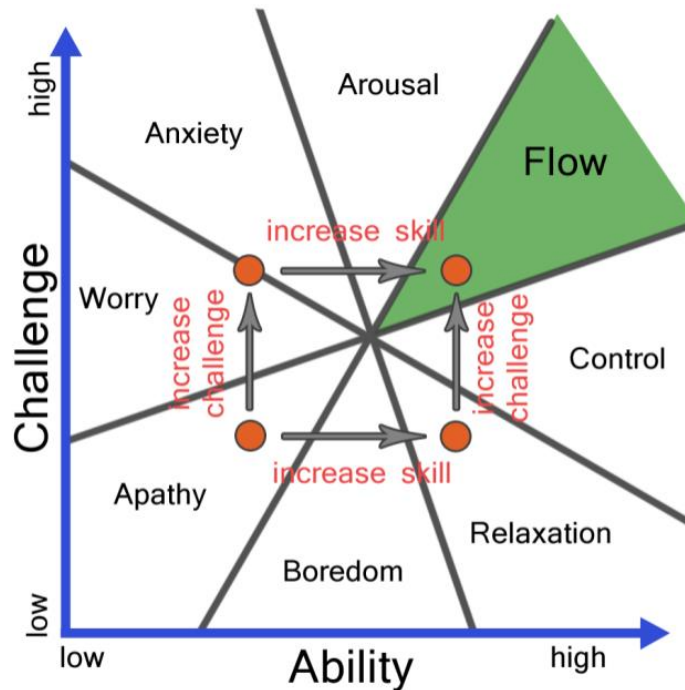
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18. The agency should adequately consider that the current lack of adequate positive recreational opportunities is producing a significant impact on the human environment including suicide and mental illness.

1.2 ENJOYMENT AND REWARDS OF MOTORIZED ACCESS AND RECREATION

- Opportunity for a recreational experience for all types of people.
 - Opportunity to strengthen family relationships.
 - Opportunity to experience and respect the natural environment.
 - Opportunity to participate in a healthy and enjoyable sport.
 - Opportunity for relief from the pandemic.
 - Opportunity to experience a variety of opportunities and challenges.
 - Camaraderie and exchange of experiences.
 - We like to build and maintain trails for use by everyone.
 - We enjoy observing flora, fauna, and landscapes.
 - For the adventure and "flow" of it.
1. The agency's evaluation of the human environment should include the significant value of flow that is provided by motorized recreation. OHV riding is our time to relax and find the "flow". "Flow is a state of mind in which a person becomes fully immersed in an activity. Positive psychologist Mihály Csíkszentmihályi describes flow as a state of complete immersion in an activity. Being immersed can be defined as a state of focus in which a person is completely absorbed and engrossed in their work." It often occurs when you are doing something that you enjoy and in which you are quite skilled. "This state is often associated with the creative arts such as painting, drawing, or writing. However, it can also occur while engaging in a sport, such as skiing, tennis, soccer, dancing, or running." OHV riding that provides a balance of skill versus challenge allows one to get so focused that time stops and anxieties, worries, apathy, and boredom disappear.

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<https://www.verywellmind.com/what-is-flow-2794768>

<https://youtu.be/8h6lMYRoCZw>

<https://youtu.be/fXleFJCqsPs>

1.3 ACKNOWLEDGED RESPONSIBILITIES OF MOTORIZED VISITORS

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

1. Motorized recreation represents and supports many different visitor interests. Supporting motorized recreation is the best way to support diversity of uses and multiple-use. This overarching fact should be adequately addressed in the purpose and need and adequately considered in the analysis and decision. We are representative of the needs of most visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists

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include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers have been observed to prefer OHV trails because we clear and maintain the trails and the trails have a desirable surface for biking.

2. Multiple-use also provides for the needs of physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. These multiple-use visitors use roads and motorized trails for their recreational purposes and the preferred alternative and decision should adequately consider motorized designations serve many recreation activities, not just recreational trail riding. We have observed and documented that 98% of the visitors to our public lands are represented by the activities discussed above. Ninety-eight percent of the visitors are there to enjoy activities associated with motorized access and motorized recreation.

1.4 PUBLIC SAFETY

1. The agency should adequately consider public safety by forcing camping, picnicking, and other motorized access activities in close proximity to well-traveled roads.
2. The agency should adequately consider public safety by squeezing motorized activities including dispersed camp into limited number of opportunities.

2 SIGNIFICANT ISSUES ASSOCIATED WITH CAMPING AND DISPERSED CAMPING THAT SHOULD BE ADEQUATELY CONSIDERED

1. The agency should adequately consider that the public prefers dispersed camping spots and that is consistent with the need for social distancing.
2. The agency should adequately consider that there is an inadequate number of dispersed camping spots in the project area. The preferred alternative should address this significant issue.
3. The agency should adequately consider that the pandemic and social distancing requirements have significantly increased the public need for more OHV opportunities.
4. The agency should adequately consider that the pandemic and social distancing requirements have significantly increased the public need for more dispersed camping opportunities.
5. The agency should adequately consider that abundant dispersed camping sites and motorized trails are essential to keep the public healthy and sane during and after this pandemic.
6. The agency should adequately consider that dispersed camp sites fill a significant need for retirees, family weekenders, boondockers, and nomads whose lives are fulfilled by these motorized dispersed camping opportunities. All existing dispersed motorized camp sites should be included in the plan as well as new sites to meet the growing need.
7. The agency should adequately consider that some reasonable visual evidence of public use on multiple use land including dispersed camp sites is acceptable.
8. The agency should adequately consider that all dispersed camp sites are highly-valued contemporary cultural sites.

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9. The agency should adequately consider that a healthy human environment depends on adequate access to dispersed camping and motorized recreational opportunities.
10. The agency should adequately consider that the public has been squeezed into too small of an area with too few motorized routes. Every weekend we talk to fellow motorized recreationists and they ask us where they can go to ride trails and camp in dispersed areas.
11. The agency should adequately consider that agency actions and mining claims are closing much needed dispersed camp spots during a pandemic when the public needs more dispersed camp sites.
12. The agency should adequately consider that motorized recreation and dispersed camping opportunities should not be closed by the Agency without site-specific data and analysis as required by NEPA guidance.
13. The agency should adequately develop and consider site-specific data that demonstrates any impact of significance to the natural environment by motorized recreation and dispersed camping when compared to naturally occurring levels of impact and change.
14. The agency should adequately develop and consider site-specific data that demonstrates that closures of motorized and dispersed camping opportunities produce any significant benefit to the natural environment.
15. The agency should adequately develop and consider site-specific data that demonstrates significant measurable impacts (compared to naturally occurring) from motorized recreation and dispersed camping.
16. The agency should adequately consider that the strategy of closing dispersed camping sites using vegetation, resource management, and travel management plans is not aligned at all with the significant public need for these recreation opportunities.
17. The agency should adequately consider that any significant negative impacts on the natural environment from dispersed camping spots can be mitigated to a reasonable level in most locations. The impact analysis should recognize this fact and pursue this alternative.
18. The agency should adequately consider that it is extremely difficult to go off-trail with the amount of deadfall in the forest now, therefore, the off-trail issue is no longer significant.
19. That agency should adequately consider that non-RV campers leave human waste behind and that RV campers dispose of their waste at treatment facilities.
20. The agency should adequately recognize that self-contained campers have an acceptable and minimal environmental impact and more dispersed camping sites need to be created to serve this popular form of recreation.
21. The agency should adequately consider why we must drive over 100 miles one-way to find a reasonable diversity of OHV and dispersed camping opportunities (quantity and quality) when the agency has multiple-use lands located near population centers.
22. The agency should adequately consider the need for RV friendly campgrounds, rehabilitated campgrounds, new campgrounds, and existing and new dispersed camping opportunities in the project area in order to meet the needs of public.
23. The Dyrts 2022 Camping Report (<https://reports.thedyrt.com/2022-camping-report/>) found that it is 3x harder to book a campground now than in pre-pandemic years. While over 8 million new people joined the camping community last year, the campground and dispersed camping capacity has not increased.
24. The opening and closing dates for many campgrounds is too late and too early respectively for the many campers and retirees who enjoy an extended camping season. Adequate dispersed camping opportunities are critically important to these visitors.
25. The agency should adequately recognize that dispersed camping provides a more authentic and fulfilling camping experience.

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