**Comments:** USFS Salida Leadville Districts VBDC

## General:

The Buena Vista meeting was very helpful for understanding the timing and scope of the project. The FS staff covered a range of disciplines and were able to respond to questions clearly.

The maps helped attendees – and those with online access- to understand the proposal. The heat maps are a valuable use of the data collected by volunteers and FS staff. (Some were worried that the data would be shelved and not put to use.)

My perspective is from being a retired rural firefighter, wildlands volunteer, and long time Chaffee County resident.

The adaptive management should be a cost and time efficient way to solve problems as needs arise. As the project unfolds, please communicate re the steps taken to implement the project, using the email list from the project and other FS channels.

I have seen and helped clean up MANY campsites that presented a significant wildfire hazard due to location, surrounding vegetation, or difficult access. Looking ahead, we can reasonably expect greater threat of a large wildfire pushed by winds.

Designated dispersed campsites should be designed and constructed with wildfire threat in mind.

I see somewhat weak wildlife concerns. Wildlife should include TES species, and sensitive species. Newly designated sites allowed in most priority habitats appear to only require minimization of impacts (seasonal closures) when those sites are near raptor nests or in elk/sheep production areas or elk winter range. Designation of sites will *increase use* of those sites and areas resulting for greater impacts to wildlife. Blanket channels for VBDC should be changed to designated sites after analysis for wildlife impacts.

The USFS must err on the side of caution when executing actions that may adversely impact wildlife to avoid permanently displacing wildlife from an area. Adjustments may not be able to restore desired outcomes with regards to wildlife.

The Proposed Vehicle Based Designated Camping maps indicate a yellow highlighted area on both sides of proposed roads where vehicle based camping is proposed to be restricted to designated sites/locations. That highlighted area appears to be rather wide. That distance and locations must be defined in the analysis moving forward.

The designation of individual roads to access dispersed campsites and the impacts of individual designated campsites/campgrounds themselves may be insignificant but the cumulatively impacts of nine or more new designated campgrounds and potentially hundreds of new motorized routes to access designated dispersed campsites will result in significant environmental impacts that require could require the use of an EIS.

Ongoing Managemant: The Chaffee Rec Rangers Program has been very successful. It has been funded locally. The responses from visitors and those concerned re resource protection have been positive. The Rangers operate across land management boundaries. This program should be expanded to the Leadville Ranger District. One slot on the Rec Ranger program should be made permanent to do: planning, staffing, ordering, and off season work where weather permits. The permanent position could also coordinate volunteer forces to leverage staff effectiveness.

- "Proposed Action
- Address current impacts to forest resources from VBDC activities. "The current impacts are well studied. Damage to vegetation takes a long time to restore. It is imperative that closures be made in the most impacted areas before significant resource damage has occurred.
- "• Maximize VBDC opportunities and types of opportunities while minimizing impacts to forest resources." It must be recognized that there are limits to expansion of VBDC that are constrained by other management mandates for wildlife, land health, and human social values.

Cooperating Partners: Solicit and work with other agencies that have an interest in protecting resources we all share. Example: Aurora water wants to protect the water quality in Twin Lakes. They could share costs of a CXT – or temporary toilets- at the Interlaken Trailhead area.

USFS resources are limited. Friends and volunteer groups can help to fill gaps of labor after land managers set out work to be done.

Education: Many users often need to learn about LNT and basic fire safety principles. Information kiosks and field personnel are important tools for communicating with users.

## Areas:

**Browns Creek:** 

The roads in Browns Creek show a a shaded VBDC band continuously. Many parts are not suitable for vehicle camping. The areas most suitable for VBDC should be marked with designated sites to prevent driving and resource damage over the entire perimeter of the existing roads.

Also in Browns Creek area there are routes used by wildlife for daily movement and also for winter range. The wildlife sensitive areas should be closed to VBDC to protect wildlife – especially during winter, when stress from excessive movement is more critical.

**Fourmile**: The Fourmile area has taken a beating in the past 40 years I have known it. It is open to speculation when the area will just be between buck n rail fencing along travel routes. The use by wildlife has been pushed back to the unroaded areas. It was a multi use area, but has become a motorsports park. There are reasonable limits to development of an area that must be observed.

Twin Lakes Dam / Interlaken: This area including the Interlaken Trailhead have been heavily impacted by irresponsible dispersed camping. The lake level rises and falls with water calls. Land areas once dry are covered by water, exposing wastes to pollute water. Travel management closures have been destroyed. Random fire rings have popped up like dandelions. No camping within 100 ft. of a stream or lake is not manageable here because the lake levels are changing frequently.

Due to serious impacts, this area should get immediate attention. The first step should be to install sanitation for the Interlaken Trailhead and future campground to stop pollution of water. As mentioned above, partners should be solicited to share costs of this, if possible. Due to changing water levels, all camping should be closed north of the Interlaken access road to stop pollution of the lake.

The campground proposed should be the only VBDC camping south of the road to Interlaken, unless other numbered dispersed sites are installed with prohibition of the random camping that is destroying vegetation.

The day use access to the lake that is just north of Interlaken parking is valuable for hand launched boats, and foot access for fishing. It is walkable and an excellent resource for those with disabilities for fishing and hand launched craft access. Other shore areas are steep and difficult for access for those with disabilities. This area should be signed as "Day Use Only" and kept with adequate parking.

The Twin Lakes peninsula closure to camping is appropriate to protect water quality and avoid disturbance to raptor nesting.

Thank you for the opportunity to comment on this important work on our public lands.

Jay Gingrich