



Dear Planning Team Members:

Please accept this correspondence as to the input on the Pre-Scoping Salida/Leadville Forest Service Districts Camping Plan. The Organizations have been involved in stewardship, volunteerism, education, and motorized advocacy within both districts for many years.

I. Who We Are

Before addressing our specific comments, we believe a summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition (COHVCO) is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists to protect and promote 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 Trails Preservation Alliance (TPA) is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (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. CORE is a motorized action group dedicated to keeping motorized trails open in Central Colorado and the region. CORE has 12 adopted trails spread throughout the Salida and Leadville Districts and has accumulated several thousand volunteer hours in both Districts over the past few years.

II. Discussion

1. General Comments

The Organizations are concerned with initiating this Camping Plan before the Final Record of Decision in the Pike and San Isabel National Forest Travel Management Process. Several roads and trails are still awaiting a decision on their final status. That makes the timing of commenting on this camping plan somewhat difficult. During that process, several of CORE's objections were sustained, and several endpoints of roads that offer camping opportunities remain undetermined. Additionally, some roads with documented campsites were recommended for closure. Closing these roads would effectively close these campsites to vehicle-based camping.

However, these same sites would undoubtedly show up along another open road section. The Forest Service is likely considering these factors; however, the pre-scoping comment period is running without a final Travel Management Decision.

The Organizations favor a multi-district approach to camping, as this encompasses much of the regional recreation area. This makes much more sense as changes to camping within one district area will ultimately influence camping across the district. The Organizations are also not in favor of restricting dispersed camping overall. There is an increasing need for legitimate dispersed camping by those recreating on public lands. The Forest Service should explore all options to maintain the current level of camping opportunities and explore additional camping opportunities.

2. Camping Sub-Groups

The Forest Service must understand the underlying reasons and groups camping on Forest managed lands within the Leadville and Salida Districts. Most campers fit into three distinct categories: Recreationalists, Overlanders, and Short-Term living. Recreationalists seek the camping experience as part of their recreation or a means to other forms of recreation. They frequently show up on the weekend or for several days blocks of time. They live somewhere else and choose to spend a short block of time in the Upper Arkansas River Valley for recreation.

Overlanders are a group that camps out of their vehicle and prides itself on being minimalistic, mobile, and adventurous. This recreation group, in some cases, frequent areas for long blocks of time and potentially moves to numerous locations over a summer season. Many of these users work remotely or have the means to stay on the road for several months a year. They seek adventure utilizing backroads, public lands, and camping. Camping is vehicle-based, so they consistently access camping using roads and trails.

Short-Term living has been in the Upper Arkansas River Valley for decades. Many people come into the county for the summer months to work seasonally, and they have found a cheap and acceptable form of housing in dispersed camping. These workers usually stay from June to August and frequently overstay the 14-day limit for a given site. These campsites accumulate stuff over the summer months and contribute to trash and human waste. These users also claim areas near Buena Vista, Leadville, Salida, Clear Creek Reservoir, Cottonwood Lake, Halfmoon, and Fourmile. These users take up many of the 'good' and easily accessible sites leaving the weekend recreators and overlanders to push farther into public lands resulting in newly created campsites.

The Upper Arkansas River Valley has developed as a tourist destination over the last 40 years and has subsequently built an economic model with tourism as the driving factor. That economic model depends on a workforce to operate summer businesses. With the increase in housing costs and the shortage of housing options, camping on public lands has become increasingly appealing. This group is being lumped into 'recreation' and could be lost during this process. The Organizations are concerned that the Forest Service will not solve the camping problem by ignoring this clear issue. If The Forest Service restricts existing camping within The Upper

Arkansas River Valley, the summer jobs will not magically disappear, nor will the housing crisis be solved anytime soon. Summer workers will be here guaranteed, and The Forest Service should acknowledge this fact and evaluate this known problem.

This Short-Term living on Forest managed land has never been legal, but it is currently causing many camping issues within the project area. The Forest Service must account for this camping group and not unintentionally damage recreational camping to try and deal with the illegal short-term living issue. The Organizations recommend that the Forest Service fully consider the short-term/affordable problems that lead to camping problems within The Project Boundary. The Organizations have brought this issue to light numerous times throughout the Envision Chaffee County Process. We have raised this issue directly with the ongoing BLM RFGO during their scoping period. Dispersed Recreational camping does create some problems; however, in most cases, the people camping for a few nights within The Forest are not the driving problem. Mass camping closures across The Districts would push camping into other areas and likely cause unintended issues elsewhere.

The Forest Service should also plan for the repercussions of the ongoing BLM RGFO camping project. The proposal currently stands to close many existing campsites on BLM-managed land bordering National Forest Managed Land. If their Proposal continues along the current path of mass closure, the entire San Isabel National Forest stands to be impacted negatively. The BLM closed campsites will likely appear as new or expanded sites within The Forest. This will probably happen during the middle of this camping project and will likely cause planning issues.

3. High-Density Corridors

The Organizations feel that only high-density corridors be considered for designated campsites and potential restrictions. These are usually roads that can accommodate most vehicles, including 2WD and large RV rigs. The areas we feel appropriate to consider as high-density corridors are:

Halfmoon Access Road CR 11 – up to the Mt. Massive Summit Trail. After that point, NFSR 110 should remain open for dispersed camping.

Clear Creek Drainage CR/NFSR 390 – up to the Winfield Townsite. After that point, NFSR 390 and NFSR 390A should remain open for dispersed camping. Recently several sites along 390 have been closed due to proximity to the creek on the south side of the road. The Organizations recommend that The Forest Service explore adding new sites along the north side of the road to offset these closures. There are ample areas near the NFSR 381 junction and other locations, which are relatively flat and can accommodate additional camping without posing a problem to the creek.

South Cottonwood Drainage/Mineral Basin NFSR 344 – up to the Green Timber Gulch Trailhead. After that point, NFSR 344 becomes a rougher road and should remain open for dispersed camping. The sites between Cottonwood Lake and the Green Timber Gulch

Trailhead have been thoroughly inventoried and contained to prevent expansion. These sites are good options for designated dispersed, and if any are closed due to proximity to the creek on the south side of the road, new sites should be created on the north side of the road to offset the losses.

North Fork Reservoir CR 240 – up to the North Fork Campground. After that point, NFSR 240 should remain open for dispersed camping. The sites between the Colorado Trail Intersection and North Fork Reservoir could be designated dispersed.

Aspen Ridge NFSR 185 – bordering the Browns Canyon National Monument. The sites here could be designated dispersed from the NFSR 185D to the Green Mountain Area. Other roads in the vicinity should remain open to dispersed camping.

Fourmile North NFSR 375/NFSR 376 – these two roads are the most highly traveled corridors within the Fourmile North Area. If the Forest Service is to consider designated dispersed in this area, these two roads are close to Buena Vista and are attractive to the short-term living camping sub-group.

Outside of these high-density corridors, The Organizations are not supportive of campsite closure or further restrictions. The remaining areas within both Districts are widely used in conjunction with dispersed recreation. We urge the Forest Service only to consider restrictions along high-density corridors.

4. Camping Experience

Throughout the initiation of the camping discussion relative to areas within Chaffee County via the Envision project, there have been references to “quality camping experiences” and camping causing the “diminishing experiences for visitors.” The Salida and Leadville press release announcing the initiation of this camping plan used the second quoted phrase specifically. The Organizations would like to point out that “quality” camping experiences are highly relative and not absolute or specific. Some users simply are looking for a flat spot to camp to engage in other recreational opportunities. Camping for them is a means to these different forms of recreation. This camping group does not need peace or solitude and does not seek seclusion without seeing other people. Many of these campers do not mind camping next to others and, in some cases, prefer it.

During the Chaffee County discussions leading up to the initiation of this project, there was much discussion surrounding what was suggested as quality camping. These discussions were also highly focused on camping as a harmful use and impact. The Organizations would like to point out that when done correctly, dispersed camping is not a harmful activity and should continue to be managed as a desirable and positive recreational opportunity. The Organizations recommend that the Forest Service only seek to mitigate the short-term living on forest-managed land and the extreme cases where recreational camping is causing adverse impacts. The Organizations also

ask the Forest Service to account for a wide range of camping opportunities and not prejudice this project with a “quality camping experience” assumption.

5. User Conflict

The Organizations are concerned whenever the assumption of “User Conflict” is brought into a management project. We do not think that a user conflict is not very real and relevant; however, the Forest Service must document a specific interpersonal conflict on the ground between user groups to manage a user conflict. Unfortunately, the Organizations have seen cases where one group will claim user conflict simply because they do not like the activity and are personally and emotionally against it. This social values conflict does not lead to solid management decisions. As mentioned above in section #4, this project is being initiated on the heels of the Envision Chaffee County Rec Plan creation and adoption. During the development of that plan, several residents specifically spoke out against dispersed camping in Chaffee County because they disapproved of it. Many of these residents also volunteered to collect campsite data for The Forest and BLM. This data could be biased and should be scrutinized. The Organizations ask the Forest Service to consider these two very separate channels of user conflict and only act on specific camping issues causing interpersonal conflict.

6. Existing Management

The Organizations have participated in volunteer work directly in both districts to contain existing campsites, and those efforts have largely been successful. We have helped contain campsites in Fourmile, along South Cottonwood, Clohesy Lake Road, and many routes around St. Elmo. These simple on-ground mitigation techniques have been sufficient in managing dispersed camping within these areas without campsite closure or restriction. This approach has also allowed volunteer groups, Forest Service Staff, and the end-user to participate in stewardship and education. The Organizations ask the Forest Service to prioritize on-ground management action above a complicated management plan or wholesale camping restrictions.

7. Camping Spurs

The Organizations recommend evaluating existing camping spurs for inclusion into the route system once the final TMP decision. These existing spur routes across both districts allow access to existing campsites. If these routes were to be closed and the access to these sites restricted, these campsites with undoubtedly show up somewhere are within proximity. Recreational users frequently camp in areas of the Salida and Leadville Districts for specific access to other forms of recreation. Simply closing these short spurs or campsites will not remove this desire for camping near recreational assets. Specific areas that should be considered for camping spur inclusion are:

The east side of Twin Lakes with access to the Interlaken Trailhead, Lake County Road 25.

All of the Fourmile Travel Management Area.

The Turret Road into Browns Canyon National Monument, NFRS 184

III. Conclusion

The Organizations are supportive of camping management and this project. We recommend the Forest Service consider the wide range of camping uses and unique camping desires. We recommend the Forest Service adopt a measured approach for camping management, reserving only the strictest regulations for high-density corridors.

The Organizations are vehemently opposed to mass camping restrictions across both Districts. We request the Forest Service to continue to work with volunteer groups to help manage dispersed recreation and dispersed camping across both Districts.

Thank you for your consideration.

Marcus Trusty



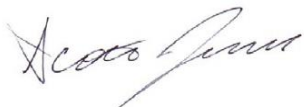
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