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Salida Ranger District
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Submitted via email to benjamin.lara@usda.gov on April 4, 2022

Dear Ben;

Please accept and fully consider these comments regarding management of vehicle based dispersed camping on the Salida and Leadville Districts (project 60591) on behalf of the Quiet Use Coalition, Rocky Mountain Recreation Initiative and Wild Connections

Our members collectively are extremely familiar with the landscapes and issues used for vehicle based dispersed camping. We have traveled over every designated motorized route on these Districts, observed and monitored camping, and worked with these Districts to complete numerous on the ground project to better manage vehicle camping. Some of our members have gained an intimate knowledge of these landscapes by living in this area for over 50 years. Many of our members have extensive experience dispersed camping using vehicles on these Districts.

We support responsible vehicle based dispersed camping and welcome this analysis, decision and its implementation.

Vehicle-based must be better defined

Licensed cars, trucks, jeeps, SUVs, motorhomes, OHVs (ATVs, UTVs, dirt motorcycles), bicycles, electric motorized bicycles, horses, wheelbarrows/carts, boats, helicopters/airplanes, large drones and over snow vehicles are all considered vehicles as they are things that are used to transport people and things.

We strongly recommend that the USFS limit this analysis to motorized and mechanized vehicle-based dispersed camping. Those types of dispersed camping are causing, or have the potential to cause, the greatest concerns associated with this form of camping. In addition, there is limited existing direction that would permit restrictions on non-motorized or non-mechanized travel for the purpose of dispersed camping.

Camping must be defined

This analysis must better define what is camping is. The type of activity, duration, and timing of the activity must be considered. Is sleeping in a car from 3-5am or 4-7pm at a 14er trailhead considered camping? Is sleeping in a car or RV for any length of time while parked along a road considered camping? Must camping involve nighttime use and sleeping or could day use, erecting a tent or shelter, starting a fire, etc. be considered camping?

We recommend that overnight occupancy, erecting or leaving gear or equipment in a location for more than 8 hours to facilitate sleeping or occupancy, starting a campfire (for cooking, warmth or pleasure, and/or sleeping in a vehicle for more than two hours all be considered camping.

Causing resource damage must be defined

The current MVUMs state that motorized dispersed camping is authorized within one vehicle length off of designated National Forest System routes, where not specifically prohibited, unsafe, or causing resource damage.

The public also has difficulty determining what resource damage is. Visitors from climates more conducive to plant growth believe it is acceptable to drive vehicles across and park on grassy areas, as they do this at home and the plants quickly recover. That is not the case in Lake and Chaffee County, where the pass of a single vehicle may leave scars that remain for years (especially in alpine areas).

Resource damage is a broad and inclusive category that could result from numerous visitor actions. We support retention of a broad based and inclusive definition of resource damage. The degree or significance of resource damage should not be qualified. We believe regulations and orders must be developed to allow enforcement of vehicle use that results in resource damage, and a better definition and examples of resource damage must be developed to guide interpretation and evaluation of resource damage by the agency and the public.

Designation of new motorized routes or areas must follow regulations

We expect the designation of new motorized routes or areas for the purpose of dispersed vehicle-based camping to follow all regulations pertaining to such designation, including those included in 36 CFR 212 Subpart B, Forest Service Manuals 2350, 7700 and 7710, and also Forest Service Handbook 7709.55.

The existing and future ability (financial or otherwise) to manage and maintain new routes and areas for vehicle-based camping must be fully considered. FSM 7715.03, 5 requires consideration of maintenance and administrative obligations and capability in the context of future budgets and staffing. The USFS cannot afford to manage and maintain its existing designated motorized route system. The addition of new designated routes and facilities must require a long term commitment of outside sources of funding and/or long term commitments of volunteer labor required to comprehensively manage and maintain vehicle-based dispersed camping on USFS lands. Local communities and businesses that believe dispersed camping provides and economic benefit must commit to contributing to the comprehensive management of that use if they want it to continue.

We expect this analysis to either more finally approve and designate, or prohibit and close, any form or type of public wheeled motor vehicle use that extends beyond one vehicle length from a designated motorized route. Any and all public motor vehicle use, for the purpose of vehicle-based dispersed camping or other uses, should be on a designated route open to that use after this analysis and decision are completed and implemented.

Concerns with the implied goal/objective of this analysis

The March 4 scoping letter contains concerning wording that states, "Managers hope to maximize the quality and quantity of vehicle-based dispersed camping on the districts while minimizing the effects of this activity on natural resources, Bureau of Land Management lands, non-public lands and other forest users." This statement could be considered a goal or objective for this analysis.

We have concerns with an objective that states that the quantity of vehicle-based dispersed camping should be maximized.

With a multiple use objective, no one type of form of use on the forest should be maximized.

No data, studies or evidence is presented in this pre-scoping letter or the story map that identifies any potential values or benefits of dispersed vehicle-based camping. Almost all language regarding this use focuses on the problems and concerns associated with it. Despite wording that suggests that dispersed vehicle-based camping is a historic and allowed use, the USFS presents no support for an objective of maximizing vehicle-based dispersed camping in the analysis area.

No studies or data are presented that indicate why people value vehicle-based dispersed camping on the forest, how this use might benefit use and enjoyment of forest lands, and/or how much vehicle-based dispersed camping is used only for an easy and inexpensive place to sleep in order to attend to other things that do not occur on or have any connection to USFS lands.

Maximizing vehicle-based dispersed camping on the forest suggests that other forms of use that might accomplish similar objectives (such as camping in developed campgrounds, staying in cabins, non-vehicle-based camping, camping that is concentrated and not dispersed) are insignificant, unimportant and should not be considered.

The maximization of this use would seemingly ignore capacity restrictions and carrying capacity limits in certain areas.

We also have concerns that this statement only considers the minimization of the effects of this use. If a use has a detrimental effect on something, the very best way to eliminate those detrimental effects is to manage the use to avoid those detrimental effects.

For example, if the sights and sounds of vehicle-based dispersed camping is resulting in detrimental effects to nearby private property residents, those detrimental effects can be avoided altogether by only allowing dispersed camping in areas where its sights and sounds will not be experienced by private property owners. Avoidance must be also considered as a potential way to effectively manage dispersed camping.

We suggest this statement be modified to read “Managers hope to optimize the quality and quantity of vehicle-based dispersed camping on the districts while avoiding and minimizing the effects of this activity on natural resources, Bureau of Land Management lands, non-public lands and other forest users.”

The USFS may not have the authority to permit or designate dispersed vehicle based camping off of routes that are not designated Forest Roads.

The 2005 Travel Management Rule allows designation for motor vehicle use on National Forest System roads, National Forest System trails, and in areas on National Forest System lands. National Forest System roads and trails are defined in the rule as forest roads or trails other than a road or trail which has been authorized by a legally documented right-of-way held by a State, county, or other local public road authority. The Rule does not provide for camping off of these non-USFS routes. Thus, the USFS may not have the authority to consider, address and designate parking, motor vehicle use, and vehicle based dispersed camping and motorized access along state and county roads, private roads or other roads not under USFS jurisdiction. Existing vehicle use on forest lands that emanates from non-forest routes for dispersed camping or other uses likely cannot be designated or permitted in this or any other analysis.

The designation of vehicle based dispersed camping and motorized use that emanates from non-USFS roads must consider that these roads have not been analyzed or designed and are not managed to safely accommodate motor vehicle ingress and egress at all locations.

36 CFR 261.13 prohibits any motor vehicle use not depicted on a Motor Vehicle Use Map. This analysis and decision must include strong direction to close and decommission any vehicle based use associated with dispersed camping that emanates from a non-USFS route.

We support a comprehensive analysis of the more permanent effects of vehicle-based dispersed camping

We support an analysis that considers and focuses on the more permanent but less visible effects of dispersed vehicle based camping.

The Envision Recreation in Balance RIMS monitoring focused primarily upon temporary impacts related to trash dumping, poop, and user experience impacts related to vehicle-based dispersed camping. These impacts were generally more temporary and likely related exclusively to the most recent camper, or other forest visitor, to that camping location. While leaving trash and poop are not to be condoned, and are undesirable, we believe those impacts fail to fully address and consider the more permanent and lasting effects of dispersed camping resulting from the presence and use of sites. A human poop in a dispersed campsite might only negatively impact desired experiences of other uses of that location for a month. The presence and use of a denuded campsite could displace wildlife, result in erosion, facilitate the spread of noxious weeds, limit forage for grazing animals, and impact adjacent private residences for years.

Concentration of analysis efforts

Almost all vehicle based dispersed camping occurs off system roads using highway licensed cars, trucks and RVs, and those vehicles generally access dispersed campsites on Forest Lands using designated system roads. So camping management efforts should be concentrated along designated roads.

We have not observed any dispersed vehicle camping off designated motorized trails as a result of OHV use. Although it would be possible to load an unlicensed OHV (ATV, UTV and/or dirt motorcycle) with camping gear and ride in along a designated trail to camp, we have not observed this type of camping along any designated motorized trail on the Salida District.

The Leadville District does not have any designated motorized trails.

For consistency, vehicle-based dispersed camping management analysis and any decisions regarding dispersed camping management should consider and apply to all roads and areas within all lands in these two Districts. We strongly recommend that this analysis be comprehensive and all inclusive, and not be limited to smaller areas within these Districts. A comprehensive site specific analysis of all lands and every individual campsite on those lands is the only way that the individual and cumulative impacts (both benefits and risks) related to dispersed camping and campsites can be properly considered.

We are concerned that a focus on areas with high numbers of dispersed campsites might result in problematic individual sites not within those focus areas being ignored.

The full impacts of vehicle-based dispersed camping must be acknowledged and considered

Dispersed camping/parking off a designated route results in additional potential adverse impacts that must be considered. These impacts often exceed the impacts associated with other forms of use, such as travel on designated routes. These include, but are not limited to the following:

- Camping/parking results in longer durations of human/vehicle presence, use and occupancy. This use and occupancy can be for hours, overnight, days or weeks

- Human and other waste disposal, spills or dumping
- Campfires, fire smoke, ashes and increased probability of human caused wildfires
- Potential recreational shooting
- Noise and unnatural sounds
- Unnatural food sources
- Unnatural light at night
- Unnatural odors
- Impacts to soils including compaction, changes in surface/subsurface hydrology, erosion, displacement such as for trenching for tents, sterility for hot campfire, etc.
- Impacts to plants and vegetation due to trampling, removal, cutting/limbing, burning introduction of invasive or noxious species, etc.
- Wildlife impacts including displacement, avoidance, internal reactions due to stress, mortality, unnatural attraction or feeding, habitat fragmentation, etc.
- Impacts to adjacent private lands and residences including trespass, noise, visible presence, trespass.
- Impacts to adjacent facilities and uses such as trails, picnic areas, designated campgrounds, etc.
- Impacts of pets, horses, etc. associated with camping either leashed/tethered or not
- Development of undesignated routes to access dispersed camping locations.
- Development of undesignated routes such as trails emanating from dispersed campsites
- Use of access routes to dispersed campsites for recreational OHV riding
- Impacts to permitted grazing livestock and facilities
- Conflicts with other users including avoidance, displacement and decreasing desired experiences of other users
- Impacts to cultural, historic and archaeological resources
- Impacts to biodiversity
- Impacts to special designated areas and their characteristics
- Impacts to visual and scenic resources
- Potential unsafe conditions.

We believe that the overall impacts of dispersed camping are often greater than impacts from other uses of USFS lands. These impacts are not limited to the immediate area around a campsite but can negatively impacts values and resources up to one-half mile away or more, as sights, sounds, smoke, odors, and other elements can result in impacts other locations. Thus, allowing or designating dispersed camping to occur on USFS land warrants additional consideration and analysis.

Protect wildlife, imperiled plants and biodiversity

Designation of motorized and mechanized routes (for travel and dispersed camping access) and/or designation of dispersed campsites or areas must protect areas with significant wildlife habitat, imperiled plants, and biodiversity.

In order to effectively manage camping and associated vehicle use on the Salida and Leadville Districts, the analysis needs to identify areas important for wildlife and biodiversity and include effective actions to protect these values. Both the presence and use of dispersed vehicle-based campsites, areas and vehicle access routes and their impacts on wildlife, vegetation, biodiversity and other resources must be considered.

Research has shown that dispersed camping can result in disturbance to wildlife, loss of ground vegetation, soil compaction, and elimination of surrounding vegetation.¹

The most effective way to identify areas important for key plant and animal species (including rare species, umbrella and keystone species, sensitive species, and species of economic importance) is to perform on-the-ground surveys of biological resources at the times of year that the animals and plants would be present and identifiable. There is baseline data available from surveys performed by organizations such as Colorado Parks and Wildlife and Colorado Natural Heritage Program. These datasets can help inform site surveys or replace them when personnel and/or time constraints make surveys less practical.

We recommend that the analysis and management plan be informed by the following datasets:

1. Colorado Parks and Wildlife Species Activity Mapping: Colorado Parks and Wildlife shares extensive geospatial data on wildlife distribution including important seasonal habitat areas. These data are created based on the expert knowledge of the Colorado Parks and Wildlife staff. These data can be downloaded here:

<https://www.arcgis.com/home/item.html?id=190573c5aba643a0bc058e6f7f0510b7>

2. Colorado Parks and Wildlife High Priority Habitat: Colorado Parks and Wildlife worked closely with the Colorado Oil and Gas Conservation Commission to identify areas where oil and gas operations could be detrimental to important wildlife species. Impacts from camping and associated vehicle routes are similar enough to impacts from oil and gas operations that these habitat areas should be given special attention in this analysis. These data can be downloaded here:

<https://www.arcgis.com/home/group.html?id=280f7c0420604edaa66ed6c0311d31d9#overview>

3. Colorado Natural Heritage Program Potential Conservation Areas: Potential Conservation Areas (PCAs) highlight areas in the state contributing to Colorado's biological diversity. Their boundaries encompass rare species and natural plant communities and reports often contain valuable information on ecological conditions, unique ecological communities, and management recommendations. PCAs are assigned biodiversity significance ranks using a 1-5 ranking system with 1 being globally outstanding to 5 being locally significant. Dispersed camping is likely impacting boreal toads an area identified as having outstanding biodiversity significance in the South Cottonwood and Cottonwood Creek watersheds. Geospatial data for the Potential Conservation Areas can be downloaded here:

<https://cnhp.colostate.edu/maps/cnhpspatial-layers/>

The reports can be accessed from here:

<https://cnhp.colostate.edu/ourdata/pca-reports/>

4. Colorado Wetlands Information Center Watershed Planning Toolbox: Colorado Wetlands

¹Cole, D.N. 2004. Impacts of hiking and camping on soils and vegetation: a review. R. Buckley (Ed.), Environmental Impacts of Ecotourism, CABI Publishing, Oxfordshire (2004), pp. 41–60.

Leung, Yu-Fai; Marion, J.L. 1999. Characterizing backcountry camping impacts in Great Smoky Mountains National Park, Journal of Environmental Management, 57: 193–203 pp.

Information Center has done extensive mapping and evaluation of wetlands, streams, likely aquatic ecosystem functions, ecological stressors, and high-priority sites for conservation and restoration at the landscape scale for the Arkansas River headwaters. There is more information about the tool and other resources here: <https://cnhp.colostate.edu/cwic/tools/toolbox/> .

5. Colorado Natural Heritage Program Colorado's Conservation Data Explorer: Colorado's Conservation Data Explorer (CODEX) is a web-based interactive map viewer that includes a set of tools to support conservation planning, environmental review, and more. This tool will create reports on wildlife and biological resources found in specific locations such as camping sites, routes and area. The tool incorporates geospatial data from many sources including the ones listed above. There is more information about that tool and it can be accessed via <https://cnhp.colostate.edu/maps/codex/>

State agencies have recently developed recommendations to avoid, minimize and/or mitigate potential impacts to wildlife from designations and management similar to dispersed camping or route designations.

Colorado Parks and Wildlife's (CPW) Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado. Available online via https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf

The Colorado Department of Natural Resources 2021 Planning Trails with Wildlife in Mind is a great source for species & habitat specific best management practices related to human recreational use. Although that document focused on trail use, we believe the principles included can be applied to vehicle-based dispersed motorized camping also. The impacts due to dispersed camping are likely greater than impacts associated with trails due to the nature, type, duration and intensity of uses and activities commonly associated with camping.

This document was the result of a multi-year effort by a Taskforce that the USFS was fully involved in. US Forest Service Region 2 Trails Lead Chad Schneckeburger and South Zone Wildlife Biologist Melissa Dressen were members of the Taskforce that developed this document, and they agreed to unanimous consensus and enthusiastic support for the document and the recommendations contained in it.

Document available online via https://cpw.state.co.us/Documents/Trails/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf

We strongly recommend that the USFS avoid designating new routes for travel or camping within high priority habitats, areas with high biodiversity significance, near wetlands, etc.

Dispersed camping that is not associated with vehicle use should generally be allowed in most USFS land locations

The ability to responsibly and appropriately park a vehicle along a designated route and walk in to a dispersed campsite, or walk or ride a horse into a location to dispersed camp, should continue to be allowed.

The vast majority of dispersed camping that occurs on USFS lands involves use of a motorized vehicle to directly access a camp location.

A distinction must be made between restricting off route vehicle travel to specific designated routes or areas for the purpose of motorized dispersed camping and limiting dispersed camping. It should not be assumed that any and all walk in camping will occur adjacent to a designated camping spur route. Areas that are inappropriate for dispersed camping should not have designated dispersed camping routes designated in or near them.

If there are areas adjacent to designated roads where all forms of walk-in camping are undesirable and must be prohibited, walk-in camping a specified distance from those roads should still be allowed. For example, the South Park Ranger District wanted to concentrate all dispersed camping near roads in designated camping areas in the Badger Flats area, but still allowed walk-in dispersed camping if it occurred over a quarter mile away from a designated road.

There are areas where all types of dispersed camping should be prohibited and restricted

Certain areas on USFS land should prohibit all dispersed camping (including walk in camping), and/or dispersed camping must be limited to a limited number of designated and delineated dispersed camp sites or areas in certain locations.

No dispersed camping should generally be allowed within one half mile of any developed campground or designated dispersed camping zone/area. This will help concentrate camping in the campground or zone, maintain desired experiences for campers in the campground and help prevent use of campground amenities by non-paying dispersed campers.

Dispersed campers near the Halfmoon, Cottonwood Lake and other campgrounds are using the campground facilities without paying the fees.

Dispersed camping generally must be prohibited within 100 feet of lakes, stream, spring, wetland or riparian areas. See Forest Plan direction at III-23. This will help protect sensitive and valuable riparian areas from disturbance. The 100-foot distance should be increased if slopes between the campsite and riparian area could facilitate impacts of camping on that area, as per Forest Plan Standard and guideline at III-73.

Camping within 200 yards of private property must be prohibited to maintain safety and respect use of that property. Camping near these areas results in conflict with adjacent property owners, due to noise, risk of wildfire, campfire smoke, loose dogs, potential trespass, unpredictable use and behavior, recreational shooting, etc. The USFS is required to consider potential conflicts with adjacent private land in travel management route planning. This distance should be greater if local conditions (lack of obstructing vegetation and/or terrain) allow dispersed camping beyond 200 yards to impact private land.

Vehicle based dispersed camping must be prohibited in certain designated areas

High impact vehicle based dispersed camping must be prohibited in certain designated areas where certain vehicles are prohibited and/or that use will adversely impact desired identified and other characteristics of those areas.

Dispersed vehicle based camping, where vehicles are permitted to directly access campsites, must be prohibited in designated Wilderness, Colorado Roadless Areas, and 3A management prescription areas.

There are numerous designated roads in close proximity to designated areas that facilitate inappropriate and irresponsible dispersed vehicle-based camping.

The development of designated vehicle parking areas that facilitate and encourage illegal or damaging walk in camping within designated areas must also be prohibited. For example, there are

areas on the Leadville District that facilitate vehicle parking for walk-in camping within 100 feet of streams within the Collegiate Peaks Wilderness, which is prohibited by Order 96-09.

In the Clear Creek area near Winfield, unauthorized motorized use associated with dispersed camping is occurring over 200 yards from designated motorized routes and negatively impacting Roadless Area characteristics within the designated.

Vehicle-based dispersed camping must be prohibited at other designated recreation facilities

Dispersed camping must be specifically prohibited (with a decision and order) at other designated recreation facilities that allow motor vehicle access and/or parking such as picnic areas, scenic overlooks, boat ramps, wildlife viewing areas, informational pullouts, interpretive sites, fishing access areas, etc. These sites were not analyzed or approved for, and are not designed to accommodate, camping and overnight occupancy. Camping in these areas will take space away from, conflict with, and potentially discourage the temporary day use recreation that these facilities were designed and designated to accommodate.

Prohibit dispersed camping at designated trailheads

Camping must be prohibited at or within 200 yards of designated USFS trailheads. Camping related parking of vehicles at trailheads reduces the spaces available for trail users. Fires, improper human waste disposal, trash, loose dogs, travel off designated routes, etc. associated with camping damages lands, causes conflict, and detracts from the desired experiences of trail users. Trailheads with toilets and large improved parking areas are an attraction for dispersed campers, but use of those facilities by campers can limit use by the trail users they were intended for. The presence of campers at a trailhead can discourage some from using that trailhead and trail out of fear. USFS visitor use monitoring indicates that very few people backpack (which involves using a trail for dispersed camping) as opposed to the number of day visitors that use trails. The number of vehicles parked at trailheads overnight should thus be very limited.

In order to prevent parking at trailheads for vehicle-based walk in camping, the 200-yard prohibition of camping at trailheads must also include areas along the initial 200 yards of any and all trails emanating from those trailheads.

Overnight camping is an issue at the Pass Creek, Angel of Shavano, Mears Jct., Timberline Lake, Mt. Elbert, Mt Massive, Huron, Missouri Gulch and many other trailheads.

Camping in recreational vehicles is often indistinguishable from day trail users until nightfall.

Recreation staff from the USFS Salida and Leadville Districts have stated an unwritten policy that prohibits dispersed camping at trailheads. Some Trailheads have been signed as closed to dispersed camping. This analysis must formally approve a no camping at designated trailheads regulation, and a Forest Order must be issued to allow implementation of that policy.

Prohibit dispersed camping where designated trails cross or intersect with other routes open to vehicle use

Dispersed camping within 100 yards of locations where designated trails cross or intersect with other routes open to vehicle use must be prohibited.

Dispersed camping in these locations interferes with desired recreational experiences with trail users. Conflict occurs in these areas due to vehicle parking, smoke, long term human presence, loose dogs and other uses associated with dispersed camping. The development of undesigned trail type routes to

and from dispersed campsites, and or lack of vegetation from heavy dispersed camp use, can confuse trail users trying to locate and stay on the designated trail and result in the need for additional trail delineation work in these locations.

Some locations where dispersed camping interferes with desired trail experiences include the intersection of Forest Road 131 and Lake County Road 25 and Forest Road 243.G intersect with the Colorado and Continental Divide Trails.

The Salida District thankfully closed a vehicle based dispersed campsite that was impacting the Colorado Trail where it intersects with Forest Road 273 based upon previous recommendations by the Quiet Use Coalition.

The visual impacts of dispersed vehicle based camping on the CDNST viewscape must be considered.

There are numerous locations on the Salida and Leadville District where the designation of dispersed camping sites, routes or areas would negatively impact the viewscape as seen from the Continental Divide National Scenic Trail.

The CDNST is a concern level 1 travel route, and the scenic integrity objective of that route is to be high or very high. The one-half mile foreground viewed from either side of that trail is an area of primary consideration for the viewscape of that trail. The CDNST must be accompanied by a management area corridor extending at least one-half from both sides of the trail in which planning must consider potential impacts to the nature and purpose of that trail. Dispersed vehicle based campsites within one-half mile of and visible from the CDNST can severely compromise that viewscape and be an unacceptable and very evident deviation from a naturally appearing landscape.²

Any vehicle-based dispersed campsites within one-half mile of the CDNST must be evaluated for potential impacts on the that trail and its nature and purpose.

New developed campground designations

The USFS should consider the creation of a new developed campgrounds, instead of designating a large number of dispersed camp roads or sites within a relatively small area. Many dispersed campers prefer and can accept camping in close proximity to other dispersed campers. Developed campgrounds help concentrate use, and permit better management of the many concerns associated with dispersed camping.

Areas in which a new developed campground could be considered include along Forest Roads 272, 252, the start of road 122 and near the start of road 390.

Retain and enforce current off route motorized travel regulations

Where designated vehicle parking or motorized camping areas are not available and where not specifically prohibited, unsafe, or causing resource damage, parking along a designated USFS route within one vehicle length off of designated route should continue to be authorized within the planning area.

Routes and areas where designated dispersed motorized campsites have been created must actively discourage and prohibit additional motorized travel off a designated route for the purpose of dispersed camping beyond one vehicle length. To continue to permit and allow motorized travel for camping and parking beyond one vehicle would defeat the purpose of the creation of designated camping routes.

² Continental Divide National Scenic Trail Comprehensive Plan. 2009. USFS page, 13. And FSM 2353.44b (7).

Restricting use to one vehicle length will help stop the proliferation and expansion of undesignated routes and help prevent route 'creep'.

This will allow walk in dispersed camping, where appropriate. This will promote consistency with adjacent BLM lands in Chaffee County, where the BLM is proposing this restriction.

FSM 7716.1(1) limits parking off a designated road to one vehicle length or 30 feet.

The length of any new routes for dispersed camping must be limited

Any new routes that are considered for designation to facilitate vehicle-based dispersed camping must be short enough so that the end of these routes are visible from the primary designated route from which they emanate.

Restricting the length of these routes will allow for easier evaluation of occupancy by other campers looking for a campsite and minimize disturbance of existing campers by those looking for a campsite. It is frustrating and time consuming for all when people drive down every existing route looking for a place to camp and have to disturb and turn vehicles around in small occupied campsites. It is difficult for USFS and other patrolling officers to monitor, sweep or educate users about compliance with regulations (fire bans, no fireworks, bear restrictions, tree cutting, trash dumping, etc.) when they have to drive in and out of every dispersed camping spur.

The length of these designated spur routes for camping and the ability to easily monitor them will vary depending upon terrain and vegetation.

Although some people would love to be able to drive down a narrow quarter mile long spur route to camp at the end of that road, that is not practical, sustainable or efficient. The benefits of such use are not worth the risks involved.

Any new spur route considered for designation to provide dispersed camping access that is longer than 100 feet should provide access to more than one designated dispersed campsite.

Respect private lands

The scoping letter states that "Managers hope to maximize the quality and quantity of vehicle-based dispersed camping on the districts while minimizing the effects of this activity on natural resources, Bureau of Land Management lands, non-public lands and other forest users."

Protect water quality

Campfires near surface water and/or in riparian areas directly and indirectly compromise water quality.

Wood ash contains concentrations of chemicals such as phosphorous, calcium and heavy metals that compromise water quality. Campfires can semi-permanently sterilize soil preventing vegetation growth. Campfires are often a concentration point in campsites, and that use can trample and destroy vegetation, compact soil, and impact surface and subsurface hydrology resulting in erosion and sedimentation of nearby surface water.

Dispersed camping must be prohibited, or the use of portable toilet devices and firepans must be mandatory, if/when dispersed camping is allowed within municipal watersheds.

Identify sides of, and specific roads, open for dispersed camping/parking

Other forests have Motor Vehicle Use Maps that include marks on the maps on the sides of certain roads to indicate whether or not vehicle parking and use for vehicle based dispersed camping is permitted in certain areas on the sides of those roads. This would help discourage inappropriate and

damaging vehicle use and vehicle-based dispersed camping on the sides of roads that parallel streams, riparian areas and/or designated areas.

Other Motor Vehicle Use Maps include a table listing only those roads that permit vehicle-based dispersed camping along them. The Salida and Leadville Districts should do this. There are obviously designated roads, such as roads that accessed developed campground or roads in the Turquoise Lake Recreation area, from which vehicle-based dispersed camping is prohibited.

Site saving must be prohibited

Restrictions on leaving unattended vehicles, tents, equipment, campers and/or gear in dispersed campsites must be developed, promoted and enforced to prohibit the saving of sites for exclusive future occupancy and use.

This practice is common on the Forest, especially during hunting season where certain users will leave camp trailers or tents in favorable dispersed campsites the weekend before certain opening days.

Additional options for dispersed camping must be considered

The project story map suggests four options for managing dispersed camping; Designated Dispersed Sites, Developed Campgrounds, Traditional Dispersed Camping and No Camping Areas.

While these are all viable options that could be considered in certain areas, there are other options that must be considered.

Designated dispersed camping areas

Defined dispersed camping area (zones or corrals) is a viable option that also must be considered. The South Park District has successfully used this approach in the Badger Flats area. All camping within ¼ mile of a road is restricted to a limited number of motorized Designated Dispersed Camping Areas (DDCAs).³ These defined areas concentrate high impact motorized camping in limited zones. This makes management and monitoring easier, focuses detrimental impacts in limited defined areas. The concentration of camping use provides great opportunities to educate large numbers of users via kiosks or signage that is more likely to be read and absorbed than roadside messaging. Forest users value the ability to focus their search for available camping options in these zones because they know where the limited options are.

The South Park District has reported that the concentration of campers in limited areas has improved visitor behavior and increased compliance with forest regulations. The presence of other campers in the immediate vicinity has reduced trash dumping, motor vehicle use off designated routes, improper waste disposal, unattended fires, irresponsible recreational target shooting, noise, etc. Many campers value the safety and security of having other campers nearby. Many campers are used to living in close proximity to large numbers of other people and do not mind camping within feet of others.

Similarly, the Gunnison Ranger District has recently implemented restrictions on camping near Crested Butte that concentrate large numbers of designated dispersed camping sites within relatively small confined areas.

The Salida Ranger District has already unofficially encouraged dispersed camping zones. Some of the defined camping corrals erected in the Fourmile area are large enough to accommodate numerous groups of campers. The designation of Forest Road 344.I has apparently facilitated legitimized another

³ USFS South Park Ranger District Badger Flats Management Project documents are available online April 2022 via <https://www.fs.usda.gov/project/?project=48069>

camping zone (although we believe camping in that area is resulting in negative impacts on riparian areas and wildlife associated with South Cottonwood Creek that are much more significant than use of that road alone.

We believe there are opportunities to create additional sustainable dispersed camping zone on the Leadville District near Forest Roads 390, 113 and 110. There are opportunities to create similar zones on the Salida District off Forest Road 272, 188 and in the Fourmile area.

These designated dispersed camping areas would ideally use previously disturbed sites, but the creation of new areas in previously undisturbed locations should be considered. It would be easy to develop new dispersed camping areas with some minor earth moving equipment, brush clearing, installation of structures to define site limits and educational signage. The creation and designation of new dispersed camping areas offers opportunities to concentrate use and closing other nearby dispersed camp sites should be considered. Additional dispersed camping near these zones must be prohibited in order to concentrate use in the designated camping areas. These designated dispersed camping areas should be located along Maintenance Level 3 or similar roads maintained for passenger car access to maximize their use and value.

Improved designated dispersed camping areas

An additional level of designated dispersed camping area should be considered that provides some additional amenities (improved fire rings, a portable toilets) either for a small required fee or via a donation tube. This would offer an option that differs from camping in a fully developed and designated campground, individual dispersed campsites or designated dispersed camping areas. The addition of portable toilets and/or improved fire rings provides needed facilities that many campers desire and would gladly support by paying or donating a fee. It is hoped that the fees collected would cover or offset the cost of managing these areas. Sponsorship of portable toilets by local businesses, groups or individuals should be considered, similar to what successfully occurs near Crested Butte.

Vehicle parking for walk-in dispersed camping

Parking areas for walk-in dispersed camping is another option that should be considered. Much of the negative impacts associated with vehicle-based dispersed camping are due to using vehicles off designated routes to access and camp in locations off those routes. Creating designated parking areas adjacent to designated routes for vehicles, and appropriate signage that permits walk in camping, should encouraged and considered as a camping option. The facilitation of walk in camping may minimize impacts and allow dispersed camping to responsibly continue in many areas.

The Salida District already has the Bootleg designated walk in campground, and many other dispersed campsite containment structures have gaps in fences that encourage walk in camping.

Strategies that avoid or minimize a desire to use vehicles or camp on the forest must be considered

The USFS must consider and encourage management actions that permit users to avoid or minimize a desire to use vehicles on or camp on forest lands.

Both motor vehicle use and camping result in detrimental effects to resources and other forest land values.

For example, there is a desire for many forest users to camp as close as possible to 14er trailheads so they can wake up and avoid/minimize navigating and driving to those trailheads in the dark, in order to start a hike to reach the summit as early as possible. We believe there would be a demand for a service

that would provide more easily accessible parking and camping areas, off forest land, and shuttles to and from designated 14er trailheads. Climbers may be more likely to stay in local motels and hotels if they knew they could take an early shuttle from a near town location that would deliver them to the Trailhead before dawn. Given that surveys from over a decade ago indicate that the average person that climbs a 14er spends almost \$300 within 25 miles of the summit in association with their climb, we believe many of those people would be willing to pay appropriate fees to support this service. Such a service would reduce vehicle use and dispersed camping associated with 14er climbing in heavily used areas such as along Forest Roads 110, 125, 390, 365, and 252.

Such a service would help minimize vehicle use and associated greenhouse gas emissions which would help address human caused climate change.

The USFS could help facilitate and encourage such use by offering new special use permits that facilitate this use, offering temporary or permit discounted special use permit fees to permittees, and or reserving special parking and turn around areas at trailheads for shuttle drivers. Restricting free vehicle-based dispersed camping near trailheads and/or charging fees to park at those trailheads would also help encourage users to seek and use other options for transportation and lodging.

Management of designated dispersed camping routes and areas

When any new route or area for vehicle-based dispersed camping is designated, a determination of seasonal use must also be made. Seasonal closure of designated routes can minimize impacts to the tread surface, minimize maintenance, minimize impacts to wildlife, help vegetation recover, etc. Necessary designated routes should be seasonally closed to protect big game winter on winter range from December 1- April 30. It must be recognized that a seasonal closure for wildlife only minimizes impacts of that route. The route will still result in wildlife impacts due to its presence even if all use is eliminated in winter. Colorado Parks and Wildlife (CPW) recommends impacts to wildlife be avoided by not designating new routes in or near priority wildlife habitats.

Seasonal route closures must apply to all human users. All forms of human use and travel can disturb wildlife. The public is more inclined to respect seasonal closures if they equally apply to all user groups.

When designating new routes for the purpose of dispersed motorized camping a determination of whether or not the routes permit non-highway licensed vehicle use (OHV use) must be made. Generally dispersed camping roads should reflect the specified use allowance of the primary designated road from which they emanate. The USFS must avoid designating shorter spur roads as open to unlicensed OHV use that emanate from County or other roads closed to unlicensed OHV use, as this encourages and facilitates unauthorized use on the non-USFS roads.

Although not specifically related dispersed camping, the Salida District has erroneously designated designated campground access road 162 A, B and D as open to non-highway legal vehicles where County Road 162 is closed to that use.

After designation, any new vehicle routes or area for dispersed camping must be signed on the ground and managed for dispersed camping. Signing these routes as dead end camping routes will discourage recreational vehicle driving and riding (including OHV riding) on them by those just curious to see what is there and where the route goes. It will help protect the privacy and experience of those actually camped on the routes. Discouraging incidental recreational motorized use on these routes will limit the amount of maintenance they require, and limit resource damage that may result when

recreational riders attempt to turn around when they see the road ends and/or is occupied. Properly identified motorized camp spur routes will also aid those looking for a dispersed motorized camp site.

Any and all designated short spur roads that are designated for dispersed motorized camping must be clearly signed as a dead end camping spur at the start of these route (in addition to the route number and allowed mode of use designations for the route).

The length of these roads should be displayed on the sign at the start of the route. This will help set user expectations for use and navigation on these roads.

Any designated dead end camping spur roads should must have their end points, and any possible unauthorized side spur routes greater than one vehicle length long, clearly signed and barricaded as closed to motorized use.

If designated dispersed camping areas are created for motorized use and parking for the purpose of dispersed vehicle camping, the outer boundary of these motorized use and parking areas must be clearly defined with signage and physical barriers in order to properly contain the motorized use and camping and prevent expansion.

Motorized travel off of any designated dispersed motorized camp spur roads must be limited to parking within one vehicle length of that route.

After designation of travel routes is complete, entry kiosks to an area should be installed or updated to inform the public regarding the availability of dispersed camping opportunities in that area. Many of the areas where dispersed camping is a concern occur along dead end roads in valleys where one kiosk and map along the single entry road to the valley could include educational information on dispersed camping in the entire area.

Camping spur roads should be primarily used for camping. Consider the identification of separate day use parking and/or staging areas if the public is using camp spur roads for these purposes.

Colorado Parks and Wildlife surveys indicate that over 60% of people in Colorado tent camp, as opposed to camping in RVs or motorhomes, and tent camping is the fifth most popular outdoor recreation activity in the state. Dispersed camping roads and locations should be planned accordingly, as most campers do not require a large area for vehicular travel. The USFS should consider specifically identifying sites and areas for walk in tent camping. Not every campsite must be designed and managed for RV use. Tent campers appreciate separate areas where they can escape the noise of RV generators.

Education regarding and enforcement of dispersed motorized camping regulations must be elevated, especially after motorized roads for the purpose of dispersed camping are designated.

A decision to designate new routes for motorized dispersed campsites must also include direction and authority to close and fully decommission/rehabilitate any existing and future undesignated dispersed campsites or other routes that might form. Including the consideration of these types of management actions will help prevent the proliferation and use of new user created vehicle-based dispersed camping routes and sites, and improve desired experiences of other forest users. It will eliminate any requirement to conduct additional NEPA analysis for closure of these type of undesignated routes and areas in the future. The implementation of this needed and essential work will help balance conservation and resource protection with desires to designate and manage any newly designated routes or vehicle-based camping locations.

Forest Orders must be developed and enforced for any new dispersed camping and/or vehicle related restrictions.

We thank you for allowing us to comment and for fully considering these comments.

Sincerely;

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