

Quiet Use Coalition comments on the Leadville and Salida Ranger District Dispersed Camping Management Preliminary EA

Submitted via email on June 18, 2025 to sm.fs.psicc.ea.comment@usda.gov

Dear Ryan Nehl and Deborah Kill,

Please accept and fully consider the following comments on behalf of the Quiet Use Coalition (QUC) on the Leadville and Salida Ranger District Dispersed Camping Management Preliminary EA.

These comments are based on maps, documents and GIS data available online in May 2025 via the project website. These comments are based on maps, documents and GIS data available online in May 2025 via the project website <https://www.fs.usda.gov/r02/psicc/projects/60591>.

These comments are in addition to previous comments submitted by QUC regarding this proposal.

The information provided by the USFS to the public with this EA is inadequate

The information made available to the public online regarding this Preliminary EA (EA) is inadequate and insufficient to allow the public to fully consider, analyze and properly comment on the proposal.

To begin with, many of the pdf, file maps posted online of proposed new route additions do not depict/include information such as a name, number or label that would allow the public to identify or comment on each specific new road being proposed for addition to the designated route system. For example, the EA Appendix E page 65 lists numerous proposed new roads, including a road identified as TL 1, displayed on a pdf file for Map 3.

But Map 3 fails to identify or label any of the roads displayed. It would be near impossible for the average person to figure out which of the depicted roads is which, and make site and road-specific comments on any of the roads (including TL 1).

We suggested the USFS provide the public with GIS information for those routes, and the USFS did so. Fortunately, the attributes of those routes contained identifying information that matches that contained in Appendix E.

But few members of the public know how or have the ability to make use of the GIS data provided.

The USFS admits the GIS data is not very accurate. It does not match existing routes that exist on the ground in many locations. So, it is difficult for the public to make informed decisions or provide informed comments without knowing exactly what is being proposed.

Thus, we believe the USFS has not provided enough information that would allow the public to analyze or comment on proposed new roads. This likely has limited the volume and types of comments submitted on these new roads.

Proposed new road comments

181 addition new road

We believe this new road should not be considered as it is not along a designated USFS road or in an area previously identified as experiences high amounts of vehicle based dispersed camping (hereafter referred to as 'camping' and there is no proposal to limit dispersed camping in this area or along Forest Road 181 or adjacent roads.

The proposal to designate this as a new road is an isolated anomaly and inconsistent with the rest of the plan. The USFS provides no information or justification as to why this route is being proposed to be added to the system as a new designated road when there are hundreds of other similar routes on these two Districts that could have been proposed for addition to the designated road system.

This route has been improperly signed with USFS signage on the ground for years as open to dispersed vehicle-based camping, even though this route has never been legally open to off road motorized travel (it has never been on a USFS map, in INFRA or on an MVUM. This has encouraged and facilitated unauthorized use on this route.

That signing and use of this route has tainted any analysis or consideration as to whether this route should become legally open to dispersed motorized camping. Members of the public likely believe that vehicle-based camping on this route is legal. Forest Service staff likely believe it is legal as well.

This road is being proposed in important priority wildlife habitats and the designation of this road will compromise that habitat. Colorado Parks and Wildlife Species Activity GIS data indicates this road is within a bighorn sheep winter concentration area and summer range, within an elk production and winter concentration area and elk summer range, and within a mule deer winter concentration area and migration corridor. Recent best management practices supported and agreed to by the USFS state that new route creation in four of those habitats should be avoided to the maximum extent possible.¹

It must be noted that bighorn sheep are a Forest Service Sensitive Species and elk are a Management Indicator Species.

This proposed route is in a 5B big game winter range Management Area and all nearby routes south of Forest Road 181, including road 173, 181A and the Beasway Trail #1418 are seasonally closed to protect wintering wildlife. In addition, the Beasway Trailhead and parking area are also seasonally closed.

The Forest Plan states that new roads in 5B Management Areas “only if needed to meet priority goals outside the management area or to meet big game goals on the management area”. The EA fails to provide any priority goals this road will meet outside this management area and this road will not help meet big game goals in the management area.

The plan also states a road in a 5B area must be “essential to achieve goals and objectives of contiguous management areas”. The EA provides no evidence that this proposed new road is essential, especially as dispersed camping will not be limited to designated sites on contiguous roads 181, 181A, County Road 175, Forest Roads 182 and 173 in the area.

The Forest Plan at III-29 contains a Standard/Guideline to protect elk calving areas from habitat modification and disturbance from May 15-June 30. The designation of a road for dispersed camping will permanently modify and disturb this elk calving area. Human presence from parking as well as

¹ : Colorado Trails with Wildlife in Mind Taskforce, 2021. Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado including the USFS, page 44. Available online via https://cpw.widen.net/s/hpbjvgzbhf/planning_trails_with_wildlife_in_mind_full_plan Note this document considers trails but the principles would also apply to roads.

camping on this new road will disturb habitat well away from this road as people will hike, bike, explore, etc. off road.

Projects almost directly adjacent to this proposed new road were specifically recently completed to enhance wildlife habitat, including a thinning project and removal of old wire fencing. It is inconsistent to propose a new system road that will compromise the very same habitat and area that those projects recently were completed to improve habitat.

QUC proposed closing Forest Road 181 and former Salida District Wildlife Biologist agreed enough to propose this to former Salida District Ranger Jim Pitts. Ranger Pitts wanted to consider it but did not want to do so just after the Forest wide Travel Plan decision.

We might support the designation of this spur road if Forest Road 181 was seasonally closed and gated from Dec 1-June 30 at its intersection with County Road 175. Otherwise, this 181-spur road should not be designated.

If this route off 181 is designated at a minimum it must be seasonally closed December 1-June 30 and numerous other dispersed campsites along Forest and County roads in the immediate area need to be closed and rehabilitated. With increasing use and visitation to this area we have noticed year-round use and camping increasing, including winter camping. This area does not currently receive a high volume of camping but if the USFS plans to open this road and designate sites on it restricting dispersed camping to this location would help offset adverse impacts to wildlife in the contiguous area. Closure of other undesignated routes would help serve as compensatory mitigation to aid wildlife in this area.

Clear Creek roads

New proposed roads must not be designated within Colorado Roadless Areas

Our analysis of USFS GIS data indicates that the proposed alignment of new proposed roads CC2, CC3, CC4, CC5, CC13 and CC15 extend into the Elk Mountain-Collegiate North Colorado Roadless Area (CRA).

Statements on pages 19, 24, 41 and 61 of the EA claiming that no road additions do fall within CRAs, roadless will not be affected, Regional Forester review is not needed, etc. are inaccurate as new roads are being proposed within CRAs and this will result in significant adverse impacts on those areas and Roadless Area Characteristics.

That type of road construction and reconstruction is prohibited in CRAs by 36 CFR 294.43. As one example significant segments of the loop of proposed new road CC-15 would need to be constructed within a CRA.

The EA states on page 33 suggests that trees may be felled to implement this project. Tree cutting and removal is generally prohibited within CRAs by 36 CFR 294.42.

Any proposed new roads segments that come within one vehicle length of a CRA boundary must be removed from this proposal.

If the USFS wishes to continue to pursue designation of new roads within CRAs, the USFS must initiate a separate Regional Forester roadless review and separate analysis.

Forest staff participating in the process that determines the location of designated dispersed campsites must be aware of and consider the location, values, and regulations of Colorado Roadless Areas.

General wildlife comments

All new roads proposed in the Clear Creek Area along both Roads 390 and 390A are within a CPW identified narrow elk migration corridor and proposed roads where best management practices supported by the USFS state new route designation should be avoided to the maximum extent possible.

Proposed new roads CC 1, 2, 3, 4, 5, 7, 8, 9, 20, 12, and 13 are within a CPW identified bighorn sheep production area and winter concentration area where new route placement should be avoided².

If any of these new roads are designated similar and corresponding compensatory mitigation work must be specified and must occur to offset the adverse impacts of adding these roads to these habitats. Ideally the best way to accomplish this would be to close a similar segment of another existing designated system road in the same habitat in another area to offset the addition of these roads. Full closure and restoration of unauthorized routes in similar habitats outside of the Clear Creek area might also be acceptable as compensatory mitigation.

Do not designate new roads that QUC had previously closed

QUC has completed extensive on the ground work in the Clear Creek area in 2021 and 2022 erecting signage, fencing and other barriers to help educate users about existing restrictions on motorized use and better implement past decisions. Some of this work closed unauthorized motorized access to dispersed campsites.

All of this work was site specifically approved and supported by Jim Fiorelli of the Leadville District and QUC submitted detailed proposals (including maps, GIS and photos) to gain permission to implement this work.

QUC invested many hours of volunteer labor in the planning of this work and its on the ground implementation. Numerous QUC volunteers selflessly spent long days in the field digging sign holes, transporting and erecting fences, placing signs, repairing vandalized signs and fences etc.

QUC use its own funds to purchase sign posts, signage and materials to complete this work.

It is extremely disappointing to see that the USFS is proposing to undo, rip down, essentially disregard this work and investment by QUC and its volunteers by proposing to reopen routes QUC closed and make them new designated roads.

Seeing previous QUC work being proposed for destruction is essentially the USFS kicking QUC in the crotch.

Perhaps the USFS has a short memory and somehow forgot that it approved and supported QUC in accomplishing this work.

It is already difficult to obtain volunteers to selflessly work on closing areas that they will likely never go into and enjoy again. It is even more difficult to recruit volunteers when they see that their work was undone/destroyed.

If the USFS wishes to continue to pursue designating previously closed route as new roads it needs to fully explain why it has changed its mind and wants to reopen those routes less than four years later. If it does decide to reopen those routes the USFS must apologize to QUC volunteers for wasting their time and money.

We are also very concerned about the USFS team deciding to undo, remove or destroy other QUC work in order to designate new dispersed campsites and the routes to access them. We are very concerned about this as there will be no further public input allowed in the adaptive management process being proposed.

² Note that proposed road 7 and 8 are identified as such in GIS data, and branch off proposed road 20.

If the proposed action is implemented, QUC will seemingly have to add an additional step before repairing/replacing vandalized or missing signs/fencing we installed, because we will not know if renegade members of the public or Forest Service staff were responsible.

CC1

Proposed new road CC-1 is within the USFS identified Clear Creek lynx linkage area. It is also within an elk migration corridor and a bighorn sheep production area. It is recommended that no new route designations occur in these areas.³

A concern we have with this proposed new road is that it will likely only provide access to a single dispersed campsite. There may not be geographic space to create additional designated sites along this road. The overall value/benefit of this road is minimized if it only provides access to a single campsite. Perhaps risks associated with this road could be reduced if it was shortened.

This is an otherwise sustainable route that we would support for designation, if compensatory mitigation occurred in other parts of these habitats to offset the impacts of this new road.

CC2

We have not noted that this proposed new road actually connects to Forest Road 390 or exists where depicted on GIS. It may require extensive new road construction to create this road.

Much of this road is in a CRA and should not be considered for designation.

If this road is designated it should not connect to CC3 as that will facilitate recreational OHV and other vehicle loop pass through. The dust, noise and disturbance of that would degrade and compromise desired experiences of campers and create conflict.

CC3

Part of this proposed road would extend into a CRA and those parts should not be considered for designation. The parts of this road that extend into the CRA generally correspond to steep sections of existing route that descend down a hill into the CRA and the creek. Parts of those existing routes exceed 30% grade down the fall line and are unsustainable. Existing routes in the CRA are within mapped riparian areas and are also within an unmapped 9A Riparian Management Prescription Area (see Forest Plan pages III-84 and III-203 through III-215).

Parts of this proposed road might be acceptable as they are on flatter ground and outside of the CRA.

QUC had previously discussed with Leadville District Rec Manager Jim Fiorelli potentially erecting a fence to exclude vehicles from the CRA, keep them off unsustainable routes and out of riparian areas. He seemed amenable to that idea. A proposed location of that roughly 230-foot-long fence is depicted on the enhanced aerial Image 1 below.

New designated dispersed campsites could be created closer to Road 390 in this area and also on the north side of that road.

³ See Planning Trails with Wildlife... pages 44, 29 and 47.



Enhanced aerial image 1

Proposed new road CC3 is the pink line.

Existing Forest Road 390 is the green line.

CRA boundary is the purple line

Proposed fence is the brown line

CC4

We very strongly oppose the designation of this road.

This route extends into a CRA and should not be considered for designation.

Quiet Use Coalition volunteers closed this route by installing posts and signage on the two entrances to it off Forest Road 390. This was with full support and approval of Jim Fiorelli.

This route is steep and off camber on the section before the loop in the CRA and would require extensive heavy equipment work and vegetation removal to carve out sustainable and useable designated campsites to make it sustainable. It would not be worth the cost and effort to do so.

If the USFS wishes to continue to pursue designating this route as a road, it needs to fully explain why it has changed its mind and wants to reopen this route less than four years later. If it does decide to reopen this route the USFS must apologize to QUC volunteers for wasting their time and money.

CC5

The southern sections of this route are within a CRA and must not be considered for designation.

There are two steep and narrow routes that descend off this flat area into the CRA. These are unsustainable and should be closed and stabilized.

The upper part of this route is on a flat, sustainable, mechanically disturbed/created area that QUC would support for dispersed camping if the two steep routes are closed.

See Image 2 below for the proposed location of a fence that would close these routes (with the addition of signage also) and provide for suitable designated dispersed camping in this area.



Enhanced aerial image 2

Pink line is proposed CC3 road (does not line up with existing routes on the ground)

Green line is USFS Road 390 Purple line CRA boundary

Brown line is proposed fence

CC7, 8 and 20

QUC had previously closed motorized access to parts of this area with support and approval from Jim Fiorelli.

Please see Image 3 below which better depicts the location of fire rings and unauthorized routes in this area in 2022, as captured by an extensive monitoring effort by QUC of dispersed camping and unauthorized motorized use in the entire Clear Creek area near USFS roads 390 and 390A. We had shared the GIS data with Jim Fiorelli.

This image also depicts current access to proposed road 20 via existing routes that join Road 390. These routes are not proposed for designation by the USFS on the east side. Note that proposed designation of roads in this area by the USFS does not indicate where or how they will connect to Forest

Road 390. A short direct connection between Forest Road 390 and CC 20 would be virtually impossible due to very steep slopes.

QUC had closed two routes on the west end of CC 20 as proposed and authorized by Jim Fiorelli. This was his idea. QUC was generally ok with leaving motorized access to the dispersed campsites open as they are so close to Forest Road 390 and are elevated above creek level. We erected a buck and rail fence across the northernmost access to this area and place signage on that fence to close that route to motorized use. That fence and signage was removed/vandalized and/or destroyed three times and we repaired/replaced it three times. We finally gave up. See the thick line in the image below.

On the east side of this area QUC installed 6 carsonites and one steel post sign and rock barriers to prohibit motorized access to a number of campsites adjacent to Clear Creek (eastern yellow line in the image). We believe that line should become a fence and all camping fires and vehicle use must be prohibited between the fence and the creek.



Image 3 enhanced aerial image

Pink lines are proposed roads CC 20, 7 and 8 Green line is Forest Road 390

Red lines are unauthorized routes that existed on the ground in 2022

White circles are fire rings that existed on the ground in 2022. There were additional fire rings further from the creek not included here. Note fire ring locations frequently appear or disappear.

Yellow lines are routes/potential routes closed to motorized use with signs and barriers in 2022. These may have been removed or vandalized since the last time we monitored them in early 2024.

CC12

We have included Image 4 below that better depicts the extent and location of existing unauthorized motorized routes.

QUC has few concerns with the designation of this route. There are actually four existing access routes between Road 390 and unauthorized routes used for camping. Only two should be designated as open and steps should be taken to deter not camping related recreational motor vehicle loop/pass through in a designated camping area.

There may be some concerns with designating a road in a 9A Management Area.

Note that QUC installed a buck and pole fence and steel post with steel “no vehicles beyond this point” sign with USFS approval in 2022. That closure should remain and there should be no connection available to routes to the west.



Image 4 enhanced aerial aerial image

Pink line is proposed CC 12 road Green line is Forest Road 390

Red line is extent of unauthorized motorized routes on the ground

White circles are some of the existing fire rings closer to the river.

The yellow line is a QUC installed fence and sign motor vehicle closure

CC13

We very strongly oppose the designation of this road and camping in this area.

The proposed road and existing dispersed campsites extend into a CRA. There is no existing route as proposed by the USFS that connects this proposed road to Forest Road 390.

QUC volunteers had previously closed existing motorized access to this CC 13 area from the east (proposed new road CC12 area) with support and approval from Jim Fiorelli of the Leadville District. After that 2022 closure, renegade motorized users have been trying to pioneer a new motorized connection to those closed routes and the CRA area from 390. QUC has repeatedly brushed in that new

unauthorized connection but it keeps being reopened. We had taken down and dispersed user create fire rings in this area to remove those as an attractive nuisance.

One reason to not designate this proposed road closed and not allow dispersed camping in this area is that QUC had also closed routes and areas to camping accessed from the west. Those closures combined helped preserve a 30-acre block of unfragmented relatively undisturbed habitat between Road 390 and the river. This area includes quality aspen forest and would provide a secure stopover resting area for elk or other species during migration.

If the USFS wishes to continue to pursue designating this route as a road, it needs to fully explain why it has changed its mind and wants to reopen this route less than four years later. If it does decide to reopen this route the USFS must apologize to QUC volunteers for wasting their time and money.

See the image below.



Image 5 enhanced aerial image

Pink line is proposed new road 13. Green line is USFS Road 390

Purple line is CRA boundary

Red line is existing unauthorized routes on the ground in 2013

White circles are fire rings taken down and dispersed

Yellow line is QUC installed fence and sign preventing unauthorized motor vehicle access to this area

We strongly oppose the designation of this new road. It should not be considered as part of this planning process.

The majority of this proposed new road (~904 feet) extends into a CRA.

Large segments of the east and southeast parts of this proposed road do not exist on the ground and would require extensive mechanical construction and blading in a CRA to create a road and make it useable.

The parts of the southern section of this proposed road were closed to motorized use by the e USFS with fencing and signage. The EA does not explain why those previous actions are proposed to be undone/reversed.

The northern segment of this road is within 100 feet of seasonally flooded wetlands and willow swamps as part of Clear Creek. This is likely within a 9A management area. Existing dispersed camping is intruding into and damaging riparian vegetation.

The USFS has improperly allowed the public to drive motor vehicles over 650 feet from designated road 390 for years, and more recently this use has been pushed to over 850 feet from a designated route. The more recent installation of no motor vehicle signs that far into a Roadless Area represents a questionable and challengeable decision. Those signs, while helpful in deterring the expansion of unauthorized use, compromise Roadless Area Characteristics and essentially provide the motorized public with the misperception that otherwise unauthorized motorized is in front of those signs is allowed.

We would support a new designated loop road and/or even a designated parking area closer to designated road 390 in this area west of the CRA boundary and a new buck and pole fence on that boundary line.

Designated dispersed campsites in this area need to include a large number of tent sites. QUC members have noted that most camping south of Winfield is tent camping by people wanting to climb Mt Huron. Most RVs are unwilling to travel all the way on the rough 390 road, especially when the camping area west of Clear Creek reservoir.

A personal note: Tom Sobal of QUC was legally camped near Forest Road 390 a few years ago in late October when he was awoken in the middle of the night by elk mewing. In the morning, he walked into the field to the east in the roadless area and saw a large number of juvenile and adult elk tracks across that field. Those elk were migrating to lower elevations in the valley and it made sense that they would avoid road 390, Winfield and steep slopes to move across that field. Tom was the only person camped in that area that night. Who knows where those elk would have gone if there were RVs and other campers in that Roadless Area field.

CC16

A primary concern with this route is its proximity to the Continental Divide National Scenic Trail and adverse impacts of this route and the potential impacts of this route and dispersed vehicle camping on the yet to be considered (but required) CDNST management area. The negative visual and other impacts of this road on the CDNST must be avoided or at least minimized.

No camping or parking should be allowed west of or along the west side of this route. The route is rather wide in places and it could be narrowed down to focus motor vehicle use along the eastern edge of the route.

There are concerns with the proximity of dispersed camping to the North Fork of Clear Creek and its associated 9A Management Area especially off the end of this proposed route.

Camping or parking must be prohibited where the CDNST crosses Road 390A. QUC removed a fire ring and rearranged rocks in a grassy area just north of 390A and east of the trail. That preserved vegetation and limited impacts on the CDNST and its users,

CC 17 and 18

A concern here is camping within a 9A Management Area off route CC 18 within 100 feet of the North Fork of Clear Creek.

Interlaken Roads

We can accept the USFS proposal with a few modifications and additions. Most of the below are depicted on the enhanced aerial image below

IL 4 should be open to the “Interlaken Trailhead” only. This is also Lake County Road 25. Beyond the trailhead that road should be closed. It would involve closing 200 feet of the County Road. The northern part of IL4 that is not County Road is already closed with boulders. The northern part is within 100 feet of the high-water mark of Twin Lakes and is in a 9A Management Area. Page III-214 of the Forest Plan states roads should be located outside of 9A Riparian Management Areas. There are unauthorized routes off this section that lead to the edge of the lake. People can park at the trailhead and walk to hike or fish at the lake in this area.

To provide access to what is now the end of IL4 and the lake we recommend designating the route highlighted as a thick burnt orange on the image below as a new designated road. This route exists on the ground currently open and is shorter than the end of IL4. It is not close to the lake.

The area at the end of IL4 must be reconfigured/reworked to avoid vehicle use, parking and road designation in the 9A Management Area within 100 feet of the high-water mark of the lake (or Lake Creek if you wish to call it that). The current proposed route is too close to the lake.

People like using this area to launch non-motorized water craft as the cove in this area is protected from prevailing wind and waves coming from the southwest.

Signage must be placed near the lake informing non-moto watercraft owners and anglers of the need to clean gear to prevent the spread of aquatic nuisance species.

IL 5 is entirely within 79 feet of the high-water mark of the lake and in a 9A Management Area where roads should not be located. We oppose designating this route as open.

IL 6 is acceptable except it must be closed and reconfigured near its terminus so no motor vehicle use or parking occurs within 100 feet of the high-water mark in a 9A area. This road does come close to lake water to the west but that water is normally not present. The USFS just approved a large vegetation management plan just south of here to preserve and protect the municipal water in Twin Lakes from potential impacts due to possible wildfire. To be more consistent the USFS must protect that same water from being degraded due to impacts that will occur if vehicles are allowed in the riparian area adjacent

to the lake. Those impacts include oil, gasoline, antifreeze, other fluids, road salt, mag chloride, brake shoe dust, noxious weed seeds, microplastics, etc. coming off motor vehicles and polluting the water.

We can accept designation of roads IL 1, 2 and 3 as for designated dispersed camping. It is good that these roads do not connect with each other to deter recreational motor vehicle driving adjacent to camping. These roads are already within 120 feet of the Continental Divide National Scenic trail and steps must be taken to avoid and limit impacts from camping on that trail, especially visual impacts.

These roads must be the only places where designated dispersed camping is to be permitted in this general area.

The existing prohibition of camping outside of designated sites in the Twin Lakes Recreation area should remain in place. There should be no camping allowed and no designated campsites created north of IL4 road. Camping should be prohibited at the Interlaken Trailhead.

To help educate the public about this a large sign should be placed entering the area on County Road 25 near the dam stating camping only in designated sites beyond this point. Just to reinforce that signs should be placed at the south end of IL6 and on IL4 at the intersection with and IL1 that state 'Day use only No camping beyond this point'.

Wildlife must be protected in this area

All of the proposed new USFS roads in this area are all or partially within CPW identified elk and mule deer winter concentration areas, severe winter range, and migration corridors.

Recent statewide direction enthusiastically supported by USFS representatives involved in its development recommended avoiding, to the maximum extent possible, new route designation within each of those six priority habitat areas.

The EA states that any of these new roads could be seasonally closed if the wildlife biologist believes they need to be.

All the new proposed USFS roads in this area must be seasonally closed to motorized use from Dec 1 to April 30 to protect big game during the winter months.

Perhaps Lake County will agree to allow the USFS to place a gate on the eastern end of IL4 road.

With changing and variable climate and weather, we cannot depend on deep snow to deter public motorized use on those routes during the winter months.

With the development of increasingly self-contained, insulated and heated RVs and vans, and 4wd Overland camping rigs, people will try to camp in this area during the winter months. Overnight occupancy will result in additional negative impacts to wintering wildlife above and beyond day use.



Image 6 enhanced aerial image of Interlaken area

Green line -IL1

Purple line-IL2

Orange line-IL3

Medium blue thinner line- IL4

Red line- IL5 (short route from the end of IL4)

Pink line- IL6

Burnt orange line- proposed access to near lake near end of IL 4

White line- CDNST

Olive line- undesignated "Interlaken Trail"

Faint yellow shaded thicker line- Lake County Road 25, according to Lake County Road GIS data, same as part of IL 4

Blue green shaded thick line- designated USFS admin road #179, closed to public motorized use.

Yellow lines-existing boulder closures. Need no motor vehicles and no camping signage.

Black lines- recommended motor vehicle closures with structures and signage.

Sugarloaf roads

We can conditionally accept much of the proposed road designations in this area.

New Roads and dispersed campsites must not be designated within one half mile of the known active Northern Goshawk nest between County Road 4 and Forest Road 113.

CPW recommended buffer zones and seasonal restrictions for Northern Goshawk nests specify no surface occupancy within one half mile of active nests, and no human encroachment within one half mile of the nest from March 15 through September 15.⁴

Surface occupancy is defined as any physical object intended to remain on the land, and specifically includes roads. Although some routes have historically been present on the land in this area, these are unauthorized routes many illegally created and should not have legally been there or used by motor vehicles. To designate an unauthorized route as a new designated road, and to designate dispersed campsites off that road, will permanently designate a legal physical object that will remain on the land and create unwanted surface occupancy.

Human encroachment is defined as any activity that brings humans to the area. This would include driving, trail or road access and camping. To designate new roads and campsites is to improperly authorize or permit human encroachment in this area.

We oppose the proposed designation of new roads TL 3, 4 and 12b in this area, and the designation of campsites off these roads as these will create new legally open surface occupancy and encourage human encroachment within one half mile of this Northern Goshawk nest.

We oppose attempts to designate campsites in this area that are open before March 15 and after September 15. It will be difficult to achieve compliance with the seasonal closure of those sites as it would require the installation, monitoring and enforcement of locked gates and signage. There are other dispersed campsites available in this area during that time period. The designation of new roads, campsites and routes to those campsites would be undesirable surface occupancy.

We oppose suggested actions in the Biological Assessment that propose to ask the public to voluntarily not camp in areas near this nest during certain time periods. Not all members of the public will comply with this and low levels of disturbance by few individuals can result in goshawks abandoning nests.

As a compromise we can accept the designation of 11, 12 and 12a as these are further away from the nest, adjacent to designated road 113, and are connector routes. The USFS must avoid designating new campsites that stray too far to the west and north from these roads to minimize impacts on this nest.

Note that TL 6 is claimed by Lake County to be part of a loop formed by Lake County Road 48 so it likely will have to remain open. The USFS must avoid designating any dispersed campsites along that road within one half mile of the nest.

We fully disagree with the determination on in Table 6 on page 37 of the EA that this proposal will benefit Northern Goshawk. How can the proposed designation of surface occupancy and human encroachment in a protective buffer zone around a known active goshawk nest provide benefit.

Note that the Northern Goshawk is a USFS Sensitive Species and deserves consideration and protection.

⁴ Colorado Parks and Wildlife, 2020. Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors. Online via <https://cpw.widencollective.com/assets/share/asset/fqmg4ds76b>

The Leadville District has already and continues to devastate habitat within one half mile of this nest by clear cutting and removing large quantities of trees in the one-half mile area around this nest.

Much of this half mile area around this nest is unsuitable for goshawk prey and hunting as it consists of Turquoise Lake and or highly disturbed and fragmented areas including designated parking areas, campgrounds, busy roads, etc.

We appreciate and thank the USFS closing the route under the powerline immediately west of this nest to public motorized use.

Note that all proposed new roads in this area are within the USFS identified Tennessee lynx linkage area, a mule deer migration corridor, and most are within an elk winter concentration area and elk severe winter range. Most of that elk winter habitat is on private land that is being developed and/or can not be protected from development like public land can be. The 'Planning Trails with Wildlife' document recommends avoiding route designations in these habitats and also minimizing route density in these habitats. The proposed designation of new roads in these habitats will have major negative impacts on wildlife. To minimize these impacts these routes must be seasonally closed to use and camping December 1 through April 30. We recommend compensatory mitigation in other areas of these habitats to help offset the impacts of these new designated roads.



Image 6 enhanced aerial image of Sugarloaf area

Pink lines are proposed new USFS roads Yellow lines are designated USFS roads

Blue lines are Lake County roads Orange lines are other roads

Purple line is a closed to the motorized public route Green circle line is area within 1/2 mile of nest

More general comments

We have major concerns about the lack of public input into adaptive management

The USFS team will be identifying and creating hundreds of new designated campsites and associated roads to access those sites. All without the ability for the public to review and comment on that. The public should have an opportunity to review and comment on the near final designation of those routes and areas.

There will be no public input allowed on the net increases in the number of dispersed campsites, and there should be.

The designation of unauthorized routes and use is concerning

This rewards unauthorized motorized use and sets a poor precedent.

It is not known if the proposed action will be more beneficial for wildlife/resources than no action

The analysis incorrectly leads one to believe that there is a need the proposed alternative to better manage vehicle based dispersed camping. That is not fully correct as the USFS already has direction and tools to do so, but they generally have chosen not to use those. Those tools include education and enforcement of the MVUM, and closure of unauthorized routes.

We generally do not like adaptive management proposals which allow the USFS staff to make decisions in the future without an opportunity for further public input. One example is future decisions made by a USFS wildlife biologist that the Salida District does not have.

We are very concerned that the EA states (page 39) that the general area of human disturbance will increase by 1/3 with the proposed action. That could only mean that the USFS interdisciplinary team will be designating large numbers of designated vehicle-based campsites and also many routes to access those 33% above and beyond what is currently allowed. Page 3 of the EA states that 'some' currently undisturbed areas may become designated dispersed campsites, and we believe that 'some' may permit many new camp locations to be created/designated.

We have concerns about the routes that will be designated to access those campsites

These are not apparently not designated roads nor will they be designated trails and are apparently not subject to road or trail designation criteria or the minimization Executive Orders. The risks and benefits of these road and their potential impacts are apparently not being evaluated and that is a concern.

The potential closure and restoration of some existing dispersed sites is unknown

The EA frequently makes an unsupported assumption that limiting dispersed camping to designated sites will be beneficial for resources and wildlife because camping will be limited to designated sites and undesigned sites will be closed and potentially restored.

But we have no idea how many designated dispersed sites will be created nor how many undesigned sites will be closed. We do not know if the closure of undesigned sites will offset the designation of new campsites, designation of new routes to access those designated sites, and/or the designation of 55 new roads.

A decision must specify that implementation must balance recreation and conservation

Implementation of this proposal must balance recreation and conservation. It will be human nature and there will be interest in working on designating/creating new vehicle based dispersed campsites. There will be much less interest in closing down and rehabilitating camp locations and access routes to those. The Forest Service must ensure that implementation of those two actions is equally balanced and both must occur equally during all phases and time periods of implementation.

Deter recreational motorized riding on designated roads and routes for designated camping

Recreational riding of OHVs and other motor vehicles through developed camping areas is already prohibited by 36 CFR 261.16(o). This use compromises desired experiences of campers and results in conflicts due to unwanted noise and dust.

Although these designated dispersed campsites are not necessarily developed campgrounds, they are being designated specifically for camping,

Roads and routes for dispersed camping should not connect to each other and ideally should have the same entry and exit route to deter recreational motorized use in loops. The riding of OHVs by youths camping in the Sugarloaf area is a concern as they will repeatedly ride the same loop over and over again, possibly because their parents told them to stay close to camp. This is a concern with camping in Lake County as all county roads are open to OHV use.

Dispersed camping roads should be clearly signed as dead-end routes for camping where they intersect with larger designated roads.

We sincerely appreciate and thank the USFS for the opportunity to comment on this proposal.

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