



Dear Planning Team Members:

Please accept this correspondence as comments on the Environmental Assessment (EA) Salida/Leadville Forest Service Districts Vehicle Based Dispersed Camping Management Plan. The Organizations have been involved in stewardship, volunteerism, education, and motorized advocacy within both districts for many years.

## I. Who We Are

Before addressing our specific comments, we believe a summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition (COHVCO) is a grassroots advocacy organization with approximately 2,500 members seeking to represent, assist, educate, and empower all off-highway vehicle (OHV) recreationists to protect and promote off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates for and promotes the responsible use and conservation of our public lands and natural resources, preserving their aesthetic and recreational qualities for future generations. The Trails Preservation Alliance (TPA) is an advocacy organization dedicated to serving as a viable partner to public lands managers, collaborating with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and promote multiple-use recreation. The TPA advocates for the sport and takes the necessary Action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands to access diverse, multiple-use trail recreational opportunities. CORE is a motorized action group dedicated to maintaining and keeping motorized trails open in Central Colorado and the surrounding region. CORE has 12 adopted trails spread throughout the Salida and Leadville Districts and has accumulated several thousand volunteer hours in both Districts over the past few years.

## II. Discussion

### 1. General Comments

The Organizations appreciate the first bullet in the Purpose and Need section, ensuring maximized recreational opportunities while minimizing adverse effects. We are also appreciative and acknowledge the progress this process has made since the NOPA comment period. We identified several discrepancies in the project data and provided specific recommendations for

the project. The discrepancies have been resolved, and we can see that several of our recommendations were included.

## 2. Proposed Action Alternative

We do agree with the change to designated dispersed campsites for camping in the selected areas. These areas include Browns Creek/Raspberry Gulch, Halfmoon Road from Forest boundary to Mt. Massive Summit trailhead, Turquoise Lake, below Sugarloaf Dam, Clear Creek Road corridor, the Fourmile area, the east Interlaken Trailhead, and North and South Cottonwood Creeks.

One metric absent from this section, which discusses design feature tables, action monitoring, initial action, and adaptive management, is the number of sites to be designated compared to the current number of documented campsites in these areas. If a given area being considered for designated dispersed camping has, say, 25 sites currently being used by the public, and the interdisciplinary team determines that 10 of those sites are not compatible with the design feature criteria, what happens at that point? Will the team also look for new locations to build designated dispersed sites during the field evaluation? Our recommendation is for the team to maintain 90-95% of the existing site numbers for a given area when converting the area to designated dispersed. If too many sites are closed, this could, by default, trigger the Action noted on page 16:

*'Respond to any new areas of undesirable camping impacts that may result from increase in demand or displacement by changing additional areas to designated dispersed camping.'*

Designating too few sites in any of the areas mentioned for conversion to designated dispersed could automatically trigger this Action. This intent to maintain maximum sites appears to be implied in the Purpose and Need, as mentioned in our general comments; however, a stated commitment to maintain the existing number (or close to it) of campsites will help this proposal achieve a result that better meets the purpose and need. This proposal also acknowledges the public's desire to keep the existing number of sites in the comments and response to comments on page 18:

*Comments suggested '100% of campsites' be retained in some areas. When an area changes to designated dispersed camping, the reconfiguration of use will likely require the removal and rehabilitation of some evidence of existing camping. However, design features applied during layout would seek to minimize that reduction.*

Suppose the interdisciplinary team conducts an on-site evaluation of each area proposed for designated dispersed locations and evaluates each site against the design feature tables. In that case, the team will also be able to identify areas that do not cause problems simultaneously. The areas without issues could then be documented and used to add new sites to offset sites closed during this screening process.

Our specific concerns in this area of the proposal seem to be valid because, on page 31, these concerns are directly addressed and subsequently downplayed.

*In some locations there would be very little reduction because the location of existing use is sustainable, while in other areas the reconfiguration of existing use would lead to a reduction. It's also important to note that designated sites in sustainable uplands may be added which provides a slight offset to those removed. The net result of designated site layout is not quantifiable because each area requires application of the design features in Table 1.*

We disagree with the assertion that the net result is not quantifiable. This proposal will be able to quantify the net result due to three factors directly. First, upon on-ground inventory and evaluation of sites in an area by the team, we will know exactly how many sites are present that the public is using. Second, we can conclude that the public is using all the sites documented because they would cease to exist on the ground or would be naturally reclaimed if they were not being used and were no longer needed. We know this to be true because this very camping proposal would not have been developed, and the documentation contained within it, showing not just use but also overuse of the existing sites, would not be present. Third, we can then conclude that all the documented sites are needed and desired by the public, or the first two factors wouldn't be present. For these reasons, this proposal and subsequent Action can directly quantify the net result.

Suppose a parking lot had 100 spaces for cars, and documentation existed showing that all the spaces were used by cars consistently during peak times? Would a 20-space reduction in the parking lot have a quantifiable net result? Absolutely. The cars would not cease to exist, and we could conclude that 20 cars would find an alternative place to park, which would come with alternative impacts. The same can be true when examining individuals seeking dispersed camping. A reduction in sites will not make camping less desirable and will not prompt the public to sell their camping equipment or vehicles. Instead, they will continue to find a way to enjoy the dispersed camping experience. For this reason, we strongly recommend the previously mentioned metric of maintaining at least 9 or every 10 existing and documented sites by adopting most of the existing sites into the designated site inventory or identifying replacement sites to offset any potential losses.

Another potential impact is that dispersed campers may travel farther up the corridor beyond the designated dispersed area to create a new site in an area that allows for open, dispersed camping. An example could be the Halfmoon drainage, where NFSR 110 continues for several miles beyond the higher concentration areas around the 14er Trailheads. If the designated dispersed area is unable to handle current and future needs, potential recreation users could simply travel a bit farther up the road and create new impacts. We do not currently support designated dispersed camping along NFSR 110 beyond what is outlined in this proposal; however, we anticipate potential impacts at these locations as a likely outcome if high use areas are restricted too much.

### 3. Effects of Proposed Action

We noticed an inconsistency in the 'Effects of the Proposed Action' section. Page 38 seems to imply the proposed Action would have an adverse effect on wildlife due to human disturbance:

Effects of Proposed Action: Under the proposed Action, where designated dispersed camping management occurs, the area of human disturbance in the summer upland areas would increase compared to taking no action. Under the proposed Action, the location of designated sites could be up to 300 feet on either side of the MVUM roads compared to a vehicle length under No Action. The spaces between corridors of human use (roads and trails) could potentially shrink around the edges and the ability for animals to distance themselves from the sights and sounds of people, dogs and vehicles would be less. Therefore, there would be an increase in camping effects to this species. For analysis purposes a worst-case scenario is an increase in human disturbance effects in all areas where MVUM roads cross upland summer foraging habitat.

The Proposed Action only includes existing sites and existing non-system access roads that are already in use. The impacts from these areas will have already been realized and will not be new. The proposed Action would not make new roads over virgin ground. The proposal seems to correct itself on page 40 under future maintenance of the new proposed for MVUM addition routes:

One assumption for this analysis is that the overall levels of motor vehicle use would not change when areas change to designated dispersed camping management. Although some reduction in campsites occurs as described in the recreation section above, these reductions would not meaningfully change motor vehicle use. Therefore, the only effect to maintenance needs would be the addition of road segments.

This analysis assumes a maximum impact of approximately 11.6 miles of various user created routes being adopted as system roads and added to the FS transportation system as high clearance ML2 roads. The added routes would follow the allowable uses and season of the parent road.

We recommend revising the wording on page 38 because the current dispersed sites and access routes are already in place and being utilized, so there is no change in human disturbance and likely less disturbance will be present if some of these existing sites are closed.

### 4. Travel Management

We agree with the proposed spur route MVUM additions included in the proposal. Specifically, we recommend adopting these route segments:

South Fourmile Road Additions: We recommend adopting the spur off of 300.B. We recommend adopting all four spurs off of NFSR 300. We recommend adopting the spur off of NFSR 189.

North Fourmile Road Additions: We recommend adopting the spur off of NFSR 375. We recommend adopting the spur off of NFSR 375. A. We recommend adopting the spurs and loops

off of NFSR 376. We recommend adopting the spur at the end of NFSR 376.B. We recommend adopting the spurs off of NFSR 311.

Salida 181: We recommend adopting the spur with loop off of NFSR 181.

Leadville Halfmoon: We recommend adopting the spur off of NFSR 110.C. We recommend adopting the spurs off of NFSR 110. We recommend adopting the spur off of NFSR 110.E.

Leadville Sugarloaf: We recommend adopting the extensive spurs and loops off of NFSR 113.

Leadville Clear Creek East: We recommend adopting the spurs and loops off of NFSR 390.

Leadville Clear Creek West: We recommend the large loop off of NFSR 390. We recommend the spurs off of NFSR 390.A.

Leadville Interlaken: We recommend all the proposed spurs and loops near the east Interlaken Trailhead.

### III. Conclusion

The Organization supports the designated dispersed camping areas discussed previously in our comments, and we support the inclusion of the proposed new MVUM routes. We recommend that the Forest Service work to quantify designated dispersed campsites and limit any reduction in the number of campsites the public is currently using. We recommend cleaning up some of the language in the impacts section.

Thank you for your consideration.

Marcus Trusty



CORE President

Chad Hixon



TPA Executive Director

Scott Jones

A handwritten signature in cursive script, appearing to read "Scott Jones". The signature is written in dark ink on a white background.

COHVCO Authorized Signer