

## Comments on DCM for 2025 Comment Period

Submitted by The Friends of Fourmile volunteer chapter of the Greater Arkansas River Nature Association, June 17, 2025

Prepared by Alan Robinson, Friends of Fourmile (FoF) Agency Contact, with input from chapter members.

### **Point 1. A general comment.**

As a first order we wish to go on record as supporting Alternative 1 – the Proposed Action Alternative. We have some specific comments and suggested corrections related to that Alternative, but commend you for preparing a comprehensive Environmental Assessment which thoroughly addresses the proposed alternative.

### **Point 2. A general comment.**

We would like officials responsible for approval of the EA and proposal to know that our FoF chapter is available and willing to provide consultation and input during future implementation. Because our volunteer activities in support of recreation monitoring and management began just after signature of the Fourmile Travel Management Plan (TMP) in 2003, we have gathered – and shared – a large mass of information on the locations of dispersed campsites and types and changes in visitor use in Fourmile. This includes results of our systematic monitoring of use during 17 straight annual Memorial Day surveys 2009-2025. Our detailed knowledge of campsite history and use, and our contribution to designing and fabricating barriers of buck and rail and other materials may be of particular interest to the agency layout team charged with selection of sites for designated dispersed camping and for those dispersed sites which are to be closed.

### **Point 3. Comment referring to Table 1. Project Design Features (pg. 7)**

We support all the features presented under the BOT, ENG, HER, HYD, LAN, NOX and RAN headings. We have the following comments concerning the REC (Recreation) Design Features.

REC1. We fully support providing an educational kiosk in general areas where designated dispersed camping is to be implemented, and we understand at full implementation this will include all the Forest Service managed lands within the Fourmile Travel Management Area (TMA) as defined in the 2003 TMP. We note since approval of the TMP the FoF chapter has been responsible (under agency guidance) for the creation of map and educational kiosks throughout the TMA, including multiple unit kiosk installations at the nine primary entry points and dozens of additional kiosks at trailheads and other locations. We also are responsible for the creation, printing and distribution of a printed map and brochure, and to date have distributed over 100,000 copies to visitors directly or to local Chambers of Commerce and recreational

equipment businesses. We look forward to continuing to provide this role as implementation of the proposal continues. *We suggest that under REC1 you include reference to printed and online educational materials in addition to specifying the need for a physical educational kiosk.*

## REC2.

In the first entry, the sentence beginning with “Consider screening...” contains two distinct points - quality camping experience and providing as much camping opportunity - which we feel might be separated to provide emphasis on the two points. We are not sure of the recommended wording but want to emphasize that providing for a “quality camping experience” is a very important design feature; it should not be put on a lower priority than ease or convenience of management in which a manager would for example like to have a designated site always in clear view from an official vehicle to simplify monitoring and enforcement, or to have designated sites close together to make them easier to patrol. The second distinct point “Providing as much camping opportunity as possible...” is a very broad declaration which seems more like a policy statement than a design feature; the “sustainability” part of that sentence is the design feature to emphasize.

In the second element “Layout of...” we support prioritizing already disturbed areas (existing dispersed sites), but we don’t want this to eliminate the potential for selecting some undisturbed sites for designation to meet the feature for providing quality camping.

In the third element “To progress...” this again borders on a policy statement rather than a design element. We observe that you have addressed the potential for reduction in individual campsites (numbers) on page 31, and suggest that Fourmile may be one of those areas where reduction may be necessary. We would not agree the total number of dispersed campsites that now exist should serve as an indicator of camping opportunities that must be maintained. Please see our later comments on Reduction of individual campsites... (pg. 31) where we observe that there are many dispersed sites that remain unoccupied even on the busiest of use days.

In the fourth element “When implementing...” the meaning is not clear. In the context of the Fourmile TMA, we think the design feature being stated here should mean that throughout the entire TMA the “management rules” should be the same, and not for example be different north and south of US285/24, or in the Mushroom Gulch sector vs Shields/McGee area.

Elements 5, and 7 we support without comment.

Element 5 “Include opportunities...” We suggest this element could be expanded to include advice on setting limits on capacity not only on the referenced group sites but also on small,

designated sites to avoid the overcrowding we have observed even in small, dispersed sites. In support of this view, we note that when the State Land Board established a series of 12 designated sites on a major spur in Chubb Park, each site has a capacity number; since this approach was begun in 2024 and especially in 2025, the capacity per site has been well respected and the previous sense of overcrowding (and resource damage) has decreased substantially.

In element 8 “Include parking...” perhaps it could be more clearly stated these areas would in most cases not be associated with a designated site but be located so as not to interfere with designated site quality camping. See a later comment on Parking for Day Use and Walk-in camping.

Element 9 misses an opportunity to refer to the future potential for substituting manufactured fire rings for rock fire rings or the use of propane campfire options. If not appropriate here (and not addressed elsewhere) we suggest this future scenario be mentioned elsewhere in the Proposal.

In element 10 there is reference to the Recreation Setting of the Forest Plan as outlined in Appendix F. Appendix F contains some references to Fourmile (pg. 68) that suggest there might be undesignated dispersed camping in areas with Frissell condition class 1-3. We’re not familiar with this condition and must presume there is no class 1-3 in Fourmile because we understand there are to be no FS areas within Fourmile where traditional dispersed camping is to continue.

Missing element. Perhaps it is noted elsewhere in the document, but we feel there should be a design feature clarifying whether campsites will be designated at trailheads; in our view this is not appropriate. Perhaps the same element could note, despite it being obvious, that sites would not be designated in areas set aside for day use only.

REC3 first/only element is not relevant to the Fourmile TMA.

REC4 only element (about translation into Spanish) we fully support, and stand ready to assist in incorporating such translations into existing or expanded kiosk panels and the map and brochure.

#### **Point 4 Comment on Reduction in individual campsites... (pg.31)**

There may be other sections in the document where this topic arises. We are not suggesting a change in this text, and in fact support the observation that in some areas there may have to be a reduction in individual campsites when designated camping is instituted.

In case it might influence future layout within Fourmile we have the following observation.

There are approximately 450 known (GPSd) dispersed campsites in the 100,000ac Fourmile TMA, including both BLM and FS managed lands. Over the past 3-4 years, on Memorial Day weekend, which is generally accepted as the busiest weekend of the year, the occupancy rate is typically about 60% (54% in 2025). This translates into about 270 of 450 available sites being occupied. We suggest that the lower figure would be the more realistic to consider as the currently available existing overnight campsite opportunities rather than the higher figure. One element which might be added in the design feature table could relate to avoiding designating a total number of sites beyond those typically occupied on the busiest days. It is probably advisable to target an even lower number of designated sites in the very beginning. However, we appreciate that demand is inevitably going to increase (despite a significant fall in 2025 vs 2023 and 2024 in Fourmile use) and that a numerical “target” may not be the best goal; sustainability of designated sites for a good quality experience and the agencies’ ability to manage those sites may be more important than absolute numbers.

**Point 5. Comment on future of firewood cutting access roads (no text reference found)**

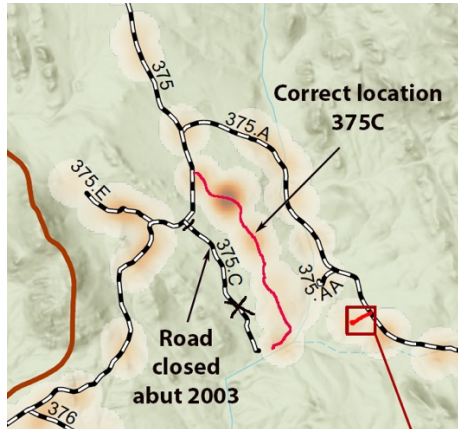
We will return to this issue in discussing proposed additional system routes but as a general comment we note in several instances in Fourmile, a non-system road temporarily authorized as access to a firewood cutting area has over time not been closed and has resulted in multiple user-created dispersed campsites. We recommend some language either in design features or a separate paragraph that clarifies that no campsites will be designated along temporary firewood access routes and that unless there are compelling reasons, no such temporary access roads will be elevated to system status, and such temporary roads should be effectively closed on termination of the firewood collection program.

**Point 6. Comment on status of roads accessing non-public features (e.g. utility corridors, pipelines, private lands - no text reference found)**

We will again return to this when reviewing proposed additional system routes, but we couldn’t find a reference to such roads when the layout team is considering where to locate designated sites. There are instances in Fourmile and probably elsewhere where a road exists to provide access to a buried pipeline or utility corridor and that such roads have over time been used to access user-created dispersed campsites. It would be good to have clarity whether the private entity can or should demand limited administrative access or if they would accept conversion of such administrative use to system route status. In some instances, this might require the Forest Service to negotiate an easement.

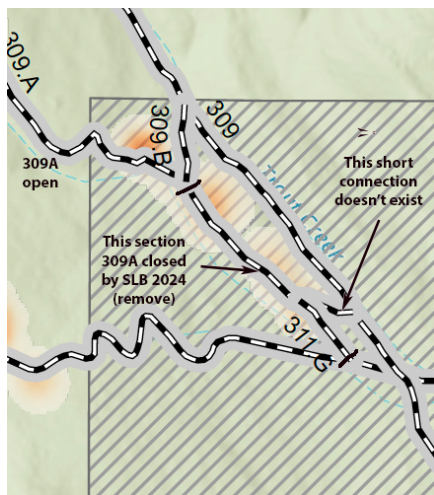
### Point 6. Comment on inaccuracy in maps.

On Map 8 proposed road additions N of 24. The actual on-the-ground location of 375C is not correct. It should be located as in the screenshot below.



We assume this inaccuracy is because you used the current NMVUM to delineate system routes in preparing this map, and in this instance, the NMVUM itself is inaccurate. To confirm that our suggested relocation is correct, note the heat map of use is along the relocated 375C where indeed there are a dozen or more GPSd dispersed campsites. The accurate 375C dead ends as indicated, at a location known as the historic Homestead. *We recommend you use this opportunity to correct the NMVUM, just as you will be recommending certain long spurs be granted system route status after designated site layout.*

On Map 8 proposed road additions N of 24. There has been a 2024 permanent closure of a portion of 309A on lands owned by the State Land Board, as seen in the following clip.



*We recommend you take this opportunity to correct the NMVUM, just as you will be recommending certain long spurs may be granted system route status.*

## **Point 7 Comment on Appendix E, Proposed Road Addition Segments List**

A general comment is that although explanations might appear elsewhere in the document, in this table it is not clear what is meant by the “GIS file,” or where we might locate the Obj IDs. Neither is it clear what the difference between the two sections of the table is. We have assumed that regardless of which table a Parent Road may appear in that the proposal is to elevate an existing spur of longer than 300 ft to system route status, subject to final approval by the layout team. We assume the length figures are as measured along the spur and not a straight-line distance from the parent road but a note that effect would be helpful. A related question, which arises from statements elsewhere in the document, is if the 300ft figure proposed as the upper limit for incorporating a spur to a designated site without requiring it be a system route is measured along such a spur or simply a straight line from the nearest system route.

Specific comments below are related to the proposed additions, in sequence beginning with the first Table and proceeding through the entries in the second table. We are commenting only on those within the Fourmile TMA. If we make no comment on a particular Obj ID it means we have no objection to it.

### **First Table**

Obj ID 1 376 L52A, B. We have no objection to this becoming a system road if layout recommends designated sites along the route; we anticipate that L52A and B will qualify. There is however a history the layout team might not be aware of: all or some of this route was earlier a system route following the 2003 TMP and was labeled 376H. This route was one of several successfully challenged in the post-2003 lawsuit that argued certain system routes had not been adequately evaluated in the NEPA for that TMP. So, it was removed from the subsequent NMVUM versions and therefore does not show as already a system route in the document’s map 8. If after layout there are designated sites on this route it would mean it would in effect reverse the findings of the lawsuit.

Obj ID 3 CLOSED We do not recognize this spur but since you refer to it as closed, we don’t see a rationale that it should be reopened and given system route status.

Obj ID 4 308C The 606ft spur you propose to add in our view is not justified. The dispersed site you reference K25B was occupied only once or twice in the past 10 years, and we have listed it as a closed site. It was not at the end of the spur you propose adding but at slightly less than 300ft from the parent road 308C. If the layout team believes there should be more sites in this area than the existing site K25A located at the dead end of 308C then the 300ft limit plus other design features could be applied without needing a system route addition.

Obj ID 5 373 Z3. The Z3 reference is unclear but it could be replaced with the campsite name A175. We have no objection to its being added as a system route because it is the commonly used access route for climbers on the adjacent Davis Face. A175 is a long-utilized dispersed site most often but not only used by climbing parties, and we anticipate it eventually qualifying as a designated campsite; otherwise, the dead end serves as a day use staging area for climbers, which makes it appropriate to be a system route. This may be a situation where it is appropriate to permit camping (at a designated site) in addition to day-use parking.

Obj ID 6 373 Z4. The Z4 could be replaced by campsite A176. We have no objection to this addition because we anticipate that A176 will eventually qualify for designation, which would not be possible without this addition. But we do note this spur was initially created as an access to the pressure relief apparatus for the Homestake buried water pipeline and therefore might be considered an admin only spur. It is occasionally used by climbers.

Obj ID 7 309A New. The history of this spur suggests it is inappropriate to add. We recommend against it. To our recollection it was an existing user created spur considered for addition in the 2003 TMP and rejected. A very seldom used campsite C19 was GPSd at the dead end but has not been recorded as used for 15+ years, and we consider it closed. There has at times been a carsonite closure at the very faint junction with 309A. We do not anticipate C19 as qualifying as a designated site. If this spur were added our expectation is that it would become used mainly as an in-out option for OHVs looking for added miles to ride.

#### Second table

Obj ID 4 376 L34. We have no objection and presume the layout team will determine the final spur location at the time of designating one or more campsites. We have currently GPSd two dispersed sites along this spur (which BTW appears to have been an early or original route of 376).

Obj ID 5 300B. We have no objection to this addition and note that it would add a system route to the highest point on this Bald Mountain loop. However, we note the condition of the existing 300B route is extremely rough 4WD+; most of its users are on ATVs or UTVs and are not typically seeking a campsite, but they do utilize the existing non-system spur to reach the high point. There is an old, dispersed campsite at the end of the proposed addition, but it is currently not named and is very seldom used due to roughness of 308B which discourages non-OHV visitors looking for a campsite. The layout team will need to consider the road condition in its decisions about designating any sites along 300B or its proposed addition.

Obj ID 6 376 G22, G23, G24. This appears to be a numbering error because these three sites are on 311B, not 376. We assume document preparers are suggesting this addition to make it

potentially possible for the layout team to designate sites in the currently undisturbed meadow east of 311B. You may feel this is justification for the addition, but we note that FoF and the FS have done extensive Buck and Rail fencing in about 2012 to prevent spread of camping from the existing sites into that very meadow. The heat map indication of high activity may be in error because the heavy activity occurred years ago and has since been eliminated by the buck and rail barriers.

Obj ID 7 311 G21 No objection.

Obj ID 8 376 L37 - could add L36 here. No objection but currently there are 8 GPSd popular dispersed sites in this complex between L36 and L37 and the final system route addition should be determined at layout. The screenshot below from the FoF Google Earth database shows this complex, and also illustrates the level of detail the FoF has on record for all 450+ existing dispersed sites in the TMA. Clicking on each dot leads to notes on the history and characteristics of that site.





Obj ID 12 311 G16. No objection, and we anticipate the layout team will decide to designate at least G16 at the dead end and possibly G161 closer to the parent road 300. However, we also note this spur was initially just an access road to the Homestake buried water pipeline and could be considered as administrative access only.

Obj ID 16 300 B05, B06. It's not clear if the measured length is from 300 to the dead end at B06, and Obj ID 19 is a measurement to B05 (see next comment). FoF has been lobbying to add this spur to B06 as a system road for a decade or more, so we encourage its addition. We do note however we also expect the layout team to recommend the actual route before it's added.

Obj ID 19 300 B05 B06. Need to clarify if this really means only the spur to B05. The current dispersed site B05 lies at the top of the shorter northward mapped spur which is steep and may be considered unsustainable as a system route. It has been carsonite signed closed off and on over the past 15 years but more recently has been used to access B05. Since its distance from the proposed addition to B06 is greater than 300 ft, you may wish to include its proposal to allow the layout team to consider B05 for designation.

Obj ID 20 375 T33. We recommend against adding this as a system route. It is an old loop created during the time an annual or semi-annual competitive hill climb event on 375 was permitted by FS. It was the upper end staging area and was sometimes used for overnight camping, so it has a named campsite T33, but we have listed it closed for more than 10 years since the hill climb event was discontinued; the old loop is almost entirely revegetated. The area it's located is within 300ft of 375 so if the layout team is seeking to designate sites along this stretch of 375 this would not be a constraint, and no additional system route is necessary here.

Obj ID 25 308.B K24. We assume you are proposing this addition with the understanding that the layout team will determine if it is necessary if they recommend designating sites along it. Although your map 9 heat zone suggests dispersed camping activity in this area beyond K24, our own experience is there is very little, and no sites have been GPSd or named there. K24 however is a popular site.

Obj IDs 300 26 and 27 B13 and B12 No objection; both access campsites likely qualified for designation.

Obj ID 30 184. We do not recognize a system route 184; perhaps this should read 189, which is shown on Map 9, in Park County? If so, it is not within the Fourmile TMA and we're not familiar enough with it to comment.

Obj ID 31 376 Z2. It is unclear which addition this refers to. The only addition which seems unaccounted for on Map 8 is on 375A towards the western edge of the map where you highlight a spur to the west. We estimate its length at 400 ft, not 1,005ft. This spur has been signed closed for more than 5 years but we have a GPSd and named dispersed site A065. If this interpretation is correct and it is proposed for addition, we have no objection; we anticipate that A065 will qualify as a designated site. If there is a different proposed addition at 376 Z2 please clarify where it is.

END of Friends of June 17, 2025, Fourmile comments on DCM EA for 2025 Comment period.