

To Whom It May Concern/USFS;

3/15/2023

Friends of Browns Canyon (FOBC) is appreciative of the ability to comment on the Leadville and Salida Dispersed Camping Management Plan as proposed by the USFS for Browns Canyon National Monument (BCNM).

As cited by the USFS in the Designated Dispersed Camping Management Plan for BCNM;

**Existing Condition:** There are approximately 6-8 spur routes off of Aspen Ridge Road (NFSR 185) that have historically been used for dispersed camping purposes but are not part of the travel system for motorized travel management.

**Proposed Actions:** Conduct a travel management analysis to determine routes to add to the NFS to allow legal motorized travel to allow legal motorized travel to designated sites.

FOBC is supportive of the designation of these 6-8 sites (one site is to the east of Aspen Ridge Road/CR185 and is outside the monument boundary) and one site is off 185D located (185DGR7- Four Mile TMP identification-year 2002 map) in the monument that have had decades of historically use.

That would leave a net of 6 sites, all with historic use, located to the west of Aspen Ridge Road, (5 of these were identified and designated alpha/numerically in the 2002 Four Mile TMP. They're 185GR, 185GRD, 185GRC, 185GRB, 185GRA ).

Likewise, these 6 sites have had buck and rail installed over the past two years, and limited to one fire ring each, to prevent further expansion of said sites and concurrent resource damage.

Per BLM BCNM ROD, Appendix 7, Page-9, none of these (historic) sites should extend more than 0.25 miles west of Aspen Ridge Road.

FOBC is not in favor of toilets being installed at any location along Aspen Ridge Road.

As follows is language from USFS BCNM ROD, Appendix 1-25.

REC-18 Aspen Ridge MZ – Trails (USFS)

Consistent with the USFS Colorado Roadless Rule (2013) and USFS Land and Resource

Management Plan (1984), as amended:

- **Close and rehabilitate spur routes off of FS 185 and FS 185D if determined appropriate after site-specific NEPA review.**
- Develop ABA/Forest Service Trail Accessibility Guidelines -compliant trails to scenic overlooks and interpretive opportunities.
- Develop signs and kiosks for navigation and interpretation purposes.
- **Do not allow new mechanized routes.**

REC-19 Aspen Ridge MZ – Camping (USFS)

Consistent with the USFS Colorado Roadless Rule (2013) and USFS Land and Resource Management Plan (1984), as amended:

- Designate areas for camping with recreation infrastructure and motorized vehicle access.
- Camping, where allowed, would be limited to 7 days.
- Camping/overnight use in trailheads or other facilities intended for day-use only would not be allowed.
- Overnight parking to support backcountry use.
- Camping in designated sites only.
- **Require use of fire-pans where overnight camping is allowed**

FOBC request that any additional spurs other than the 6 historic sites be closed in the area of 185 and 185D in BCNM and fire pans be installed at the designated historic sites.

Language from USFS BCNM ROD pertaining to Railroad Gulch, Appendix 1-26;

REC-22 Turret Road MZ – Trails (USFS)

Consistent with the USFS Colorado Roadless Rule (2013) and USFS Land and Resource Management Plan (1984), as amended, allow development of visitor infrastructure only as necessary to mitigate and protect BCNM ROVs from social trails and parking and provide BCNM gateway access on adjacent USFS administered lands.

REC-23 Turret Road MZ – Camping (USFS)

Allow motorized dispersed camping within one vehicle length off of designated routes, where not specifically prohibited, unsafe, or causing resource damage.

Camping, where allowed, would be limited to 7 days.

Camping/overnight use in trailheads or other facilities intended for day-use only would not be allowed.

Allow overnight parking to support backcountry use.

Require the use of fire-pans where overnight camping.

Allow designated dispersed camping if needed to adaptively manage, mitigate, and protect monument ROVs

FOBC is not in supportive of any designated dispersed camping sites on Turret Road (FS184), nor fire-pans, nor toilets, nor visitor infrastructure.

There are no historic designated campsites off FS184, and FOBC notes that over the past 25 years of patrolling Turret Road/FS184, the historic activity has been campers engaging in one vehicle length camping off FS184.

Friends of Browns Canyon

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