

Data Submitted (UTC 11): 9/21/2022 2:38:23 AM

First name: Kenny

Last name: Bearden

Organization: Overland Mountain Bike Association

Title: Executive Director

Comments: Please reference attachment for full comments.

Our organization helps to maintain several trails within the project area, and we have been highly involved in rehabilitating trails on the Canyon Lakes Ranger District following the Hewlett Gulch, High Park, and Cameron Peak Fires. We appreciate the general goals of the plan to restore forested ecosystems and reduce wildfire risk to communities within and adjacent to the project area. We are writing to express concern over one element of the proposed plan pertaining to the designation of Killpecker Trail (trail number 956) as a Potential Operational Delineation (POD) boundary (Figure 1) and the possible activities that could be used to improve it to function as a wildfire containment feature.

Killpecker Trail is a steep, singletrack trail open to hiking, equestrian, mountain bike, and motorcycle use (<https://www.fs.usda.gov/recarea/arp/recreation/recarea?recid=36791>). Except for a short section that crosses an alpine meadow, the trail is surrounded by lodgepole and spruce-fir forest. The lower half of the trail closely parallels Killpecker Creek and crosses it twice. The typical trail grade is 20% (<https://www.fs.usda.gov/ivm/>).

We see several conflicts with applying the activities described for POD boundaries to Killpecker Trail:

*Intensively managing fuels within a 300 to 1,000-ft wide zone around the trail (width from Preliminary Purpose & Need and Proposed Action, page 32) would dramatically alter the visitor experience of the trail and may be impractical to achieve along much of the lower half of the trail due to its proximity to the stream and several sections that are confined to a canyon with steep side slopes.

*We are especially concerned that lodgepole clearcuts would be implemented along the accessible sections of the trail as described in the management activity cards (Appendix A, activity cards 4 and 5). Many people choose to recreate on these trails in the summer because of the cooler temperatures and shade of the forest. Clearcuts have recently been implemented along sections of Killpecker Trail and the nearby North Lone Pine Trail (trail number 953) to the detriment of the user experience.

*We are also concerned that designating Killpecker Trail as a POD boundary could lead to trail widening and damage through several mechanisms:

- oDirectly through the implementation of mechanical treatments, especially that involve temporary road or skid trail construction along or over the trail.

- oIndirectly from the thinning or clearcut activities improving four-wheel vehicle access to the trail. Illegal four-wheel vehicle use has been an issue on the trail. Investments were recently made to gate all the trail access points along Killpecker Road to keep four-wheel vehicles off the trail but opening up the forest along the trail could render this management tactic ineffective.

- oIndirectly from encouraging high-impact suppression tactics such as dozer line construction along the trail during future wildfires. Dozer line was constructed over the top section of the North Lone Pine Trail during the Cameron Peak Fire without being repaired. We worry about similar outcomes if Killpecker Trail is viewed as a preferred wildfire containment feature. The outcomes of such actions on Killpecker Trail could be worse due to the proximity to the stream.

We encourage exploration of the following alternatives:

*Please consider alternative wildfire control features in the nearby area that could meet the intent of this POD boundary while avoiding recreation impacts. Many sections of the Killpecker Road already meet the POD boundary design criteria described in the preliminary plan. The Killpecker Spur Roads (300.A and 300.B) also appear to be reasonable options that could support better vehicle access for fire suppression than a singletrack trail.

*If alternative locations for the POD boundary are not acceptable, please consider applying the primary management actions for POD boundaries in roadless areas to Killpecker Trail and other trails (Preliminary Purpose & Need and Proposed Action, page 52-53). Hand thinning of small diameter trees, pruning lower limbs, and piling and burning the cut materials would preserve more of the character of the trail compared to large clearcuts. These activities may even benefit the recreational experience by removing some of the abundant snags which frequently fall and block the trail. Given the intent for this to be a flexible plan, we encourage you to describe a separate set of activities for POD boundaries along recreational trails, so these standards would apply to all other locations.

*Please consider adding emphasis to the lodgepole clearcut management activity cards (Appendix A, activity cards 4 and 5) to indicate that "interpatch reserves" should be prioritized along trails to mitigate impacts on the recreational experience.

Thank you for considering our comment.

Respectfully,

Overland Mountain Bike Association