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Comments: Thank you for allowing me to comment.

Issues and concerns with this document: it is strikingly deficient to identify the issues and set the stage for assessing the problems at hand. I give you credit for trying to reduce the fluff found in most documents, but this one completely misses the mark of substance (and Law, Regulation and Policy). Yes, the situation of unmanaged recreation needs to be addressed, but a more appropriate document must be prepared, for the reasons outlined below. However, I am not sure any amount of Planning will make up for the need of boots on the ground. I'll mainly detail comments for the Leadville Ranger District, but some of the comments carry over to all these identified recreation concerns on the Salida Ranger District.

The Adaptive Management (AM) strategy environmental document prepared pursuant to NEPA must disclose not only the effects of the proposed action or alternative but also the reasonably anticipated effect of the adjustments that may be made. Such a proposal or alternative must also describe the monitoring that would take place to inform the responsible official whether the action is achieving its desired outcome. Specifically, the proposed action or alternative employing an AM approach must describe, and the supporting NEPA document must analyze:

- * identification of uncertainties to be addressed through management and monitoring;
- * one or more specific questions that can be answered in the course of managing and identifying monitoring protocols;
- * how the AM approach is reflected in the alternatives being considered;
- * the environmental effects of the proposed AM approach and each of the alternatives;
- * the monitoring protocol including a reasonable mechanism to assure that monitoring will occur;
- * the desired outcome;
- * the performance measures that will determine whether the desired outcome is being achieved or whether a mid-course corrective action is needed;
- * the factors for determining whether additional NEPA review will be needed in the future;
- * the thresholds or causes requiring adaptive or remedial action and the specific management options that may be used;
- * clear timeframes for long-term goals and short-term evaluations;
- * a description of the AM oversight team composition and processes, with provisions for conflict resolution; and
- * provisions for data management, documentation, and reporting

This has been proven time and again in Case Law.

Line Officers and assessment fatigue: The area around the Forebay has been subjected to at least three Environmental Assessments concerning recreation, or travel management in the past eighteen years; this one makes four! These repetitive exercises set about a definite disadvantage or any public input, and giving the advantage to NGO's - who have paid staff, or Forest Service - who have paid employees. This continual aggravation of burdening the forest users (and owners) needs to stop! And now, this document states another repetition of travel management is also on the way? Line Officers need to own and take control of this perpetual process, seemingly planning until the desired outcome (whatever closure that might be) is met. Also, it hasn't been long since the Forest Service, with great fanfare, rolled out "it's all yours, come play." Remember that? I believe it was 2015 and 2016. However, now you are telling us "don't play here, or there, even over yonder."

According to the latest Census, Lake County is 73% White and 35% Latino or Hispanic,. However, public school

demographers for Lake County detail 73% Hispanic and 23% White. Hispanics traditionally use dispersed sites and stay away from the more crowded concessioned campgrounds. This proposal, as it now stands, will cause undue harm to the Latino and Hispanic community, which in turn, is in direct violation of the Secretary of Agriculture's policy on diversifying and including minority recreating publics.

In Table 3, there is a reference to "CS" under "management trigger." I would recommend a more neutral description than "trigger", such as "management action point". Also, I may have missed it, but I see no explanation of what a "CS" might even refer to.

Maps: The maps are terrible and completely confusing! Why not use the same color and layout scheme for all the maps, instead of varying colors and hash marks that confuse the casual user? Specifically, on the Forebay "Detail" Map, the white "inset" covers all the area proposed camping that is displayed on the "Proposed Vehicle Based Designated Camping" Map! The 125.B road (South Elbert Trailhead) bisects the old Twin Lakes Village dump site. It has been hardened and used for many years, and an excellent spot to designate dispersed camping. Why is it not identified? Terminus of Forest Road 122, near the old Hollenbeck fish ponds also contain excellent "hardened" dispersed sites, but I can't tell if this is out of the analysis area or now proposed to be closed. Why not put County Roads on these maps instead of "hanging" Forest Service roads? It would make things a lot easier to track.

And finally, the reference to Mt. Elbert, in Appendix B: It just seems to appear - out of nowhere, with no map, nor explanation except for inclusion within the table. Is this for both South Elbert and Halfmoon Trailheads? Are the signs posted at the Trailheads for no fires at the Trailheads, or no fires for the trail? Please explain what the goal is, and where.

As I stated earlier, managing recreation is very much needed in these areas to diffuse a potentially damaging condition to the natural resource. I certainly am a believer in addressing - correctly, the situation and then following the Adaptive Management Rules within the NEPA Framework. However, this document needs to sever the two Ranger Districts and independently, systematically address the Purpose and Need.

/s/ Jim Zornes