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Comments: See attached comment.

Farris Creek NFSR 736 December 21, 2023 Subject: Public Scoping for a proposed change (50" restriction) in the designation of NFSR 736 Farris Creek Planning Team: Please accept these comments relative to the scoping phase of the proposed action on Farris Creek Road, NFSR 736, on behalf of Colorado Off Road Enterprise (CORE). Prior to our comments, a summary of our organization will be helpful. CORE was formed in 2016 as a grassroots motorized advocacy/trail adoption group. We work with the BLM Royal George Field Office, the Salida Ranger District, the Leadville Ranger District, the Gunnison Ranger District, and the Eagle Holy Cross Ranger District concerning trail adoption, volunteer trail projects, and area cleanups. Currently, we have 15 adopted trails: 8 in Chaffee County, 4 in Lake County, and 3 in Gunnison County. Over the past seven years, CORE has developed a positive relationship with land managers, private property owners, and our motorized user group. CORE is a 100% volunteer organization funded solely by member dues, donations, and grants.

I. Introduction CORE is very familiar with the recreation opportunities within the Gunnison Ranger District and the surrounding area. Over the past four years, we have done several thousand hours of volunteer work in the Gunnison District, ranging from Tomichi Pass, Alpine Tunnel, Williams Pass, Tincup Pass, Napoleon Pass, and Pearl Pass. CORE would advise/request that this project include a review and possible conversion of NFSR 736 to a 'Full-Size Motorized Trail,' which would still allow multi-user recreation to take place and enable all users to continue to enjoy the last two miles of the route up to the Singletrack 409 trail begins. This proposal acknowledges the increase in area recreation and the continued desire for the public to access the road and trail system in the Gunnison Ranger District. CORE is concerned that while this agreed-upon fact is not disputed, a desire for public access, this project has taken the path of access restriction as the remedy to mitigate impacts. The scoping letter has not considered several factors that warrant discussion if such a restrictive action were to be implemented.

II. Out-and-Back Roads/Trails are Valuable Recreation Assets. This proposal seems to imply that NFSR 736 is mainly used as an access route for Trail 409. This would assume that 736 is merely an unimportant 2-mile connector for singletrack riders. CORE views this route much differently regarding public land access and general 4x4 motorized recreation. The 2-mile section of this route that is an out-and-back is a 4-mile recreation opportunity for the public because it's a 4-mile roundtrip from start to finish. We have documented the distance it takes for a 4x4 driver to engage in a half-day of recreation and a full day of recreation. Suppose a 4x4 driver is navigating a vehicle at a slow rate of speed in 4wd low range. In that case, it doesn't take a lot of mileage to provide the desired recreational experience of 4x4 driving, exploring new areas, or simply accessing unique regions of the mountains. A half-day 4x4 recreation trip is between 4 and 10 miles of trail or 4WD road. If you factor in driving time to and from the route, a lunch or snack stop, photographs, and exploring, that will quickly fill up half a day. A full-day 4x4 recreation trip is 10-20 miles of trail or 4wd road. This is the same comparison for the half-day trip. If you factor in driving time to and from the route, a lunch stop, photographs, and time to explore the day trip is filled. Several of our adopted trails are only 3-6 miles long, out-and-back roads, and we have documented this metric many times. Subtracting these 2-miles from public access and general 4x4 driving will eliminate a half-day recreation trip from the Gunnison District offerings. CORE believes this would be an unfavorable decision for public access and a net negative for those who enjoy 4x4 driving. This is highlighted by the fact that the route is desirable for vehicles larger than 50" by the usage that has been documented. While negative impacts have resulted, if this project goes to rehab areas and continues to allow motorized use, the district could expand the proposed actions to include an additional 30" of trail width to accommodate full-size vehicles while still accomplishing the purpose and need.

III. Camping Opportunity Reduction Dispersed Camping opportunities are coveted recreation assets everywhere on public land. The Gunnison District is aware of this rise in need and desire, as evident by several camping management decisions over the past several years. 'Overlanding,' basically camping from a vehicle, is one of the fastest-growing segments of outdoor recreation. These users seek seclusion and dispersed camping away from some of the more popular destination, 4x4 roads, and trails. Subtracting 33% of the designated dispersed sites from NFSR 736 will hurt the public's ability to find

designated sites. While these sites won't technically be closed to the public, they are a defacto closure because the site can't be used if it can't be accessed with the type of vehicle the public uses in most dispersed camping actions, and the sites are next to a Forest Road. People don't frequently camp off an ATV, a small (50" and less UTV), or a moto. Indeed, there are camping examples from these groups, but the number of people engaging in camping from a full-size vehicle far exceeds all other motorized modes. Closing the last 2-miles of NFSR 736 to full-size 4x4 vehicles and access to the two designated dispersed sites will negatively impact camping opportunities.

IV. Management Challenges CORE understands the desire for 50" trails from a planning perspective, and at one time, these restrictions were desirable for that specific recreation group. However, the change to the more modern desirability of multi-use recreation and the decline in ATV popularity has rendered many 50" trail designations obsolete for ongoing management. NFSR 736 was not a planned 50" trail that was scoped and constructed out of an identified need to accommodate the 50" machine. NFSR 736 is a road used for multiple purposes over many decades. CORE believes The District should maintain this type of use and the width of this road. If necessary for future management, NFSR 736 could be converted to a Full-Size Motorized trail, preserving the historic use while prioritizing resource protection as stated in the purpose and need. The modern SxS machine and the patterns of modern recreation make a specific designation outside of a motorized single track trail nearly impossible to manage. Some SxS machines are 50" wide, but they are few and far between. The modern SxS machine is much larger than 50", and modern recreation patterns show different sizes of machines and users recreating together on the same roads and trails. Suppose a family camps and recreates in the vicinity of NFSR 736. Some members of the family ride ATVs; one member has a 50" SxS machine, and two members have SxS machines larger than 50". They are all riding together and come upon NFSR 736. Under the current proposal, if enacted, 3 of the five machines could travel the route, but 2 of them would be barred. This scenario is very real; we have witnessed this exact user profile many times while in the National Forest. Unfortunately, in most instances, the two larger SxS machines will break the rules and still travel the route with their group. Unless The District has someone stationed at the width restrictor around the clock, there will be no enforcement, and the route will again be used by full-size vehicles by removing the management implementation or driving around the restrictor.

V. Conclusion CORE recommends converting NFSR 736 to a full-size motorized trail to rehab the off-trail areas and to establish the edges of the trail to keep all users on the route and out of the wetlands. This could be accomplished with a Class 2 designation, which would allow the route to feature a rougher surface and potentially constructed obstacles and/or a gatekeeper obstacle to reduce the use volume, if that is a management desire, while still allowing public access and access to Trail 409. This will accomplish the purpose and need of this project to maintain motorized use along NFSR 736 up to 409, but this will also continue to allow public use along the entire length of NFSR 736. This would also improve management of the route without the confusing size restrictions for users. CORE will be a willing participant if the district requires a partnership group to help keep NFSR 736 open to full-size vehicles. We could also be a partner should more funding be necessary to maintain motorized use along NFSR 736 with OHV sticker grant funding. Thank you, Marcus Trusty CORE Founder