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First name: Ellen

Last name: Hollinshead

Organization:

Title:

Comments: RE: SOUTHERN TENMILE RECREATION ACCESS PLAN

September 1, 2025

So much work went into this plan and it is much appreciated. The Tenmile Range is seeing a dramatic increase in use and this plan shows a great first step on how to manage. There are a few comments on each area which will be listed below. One significant observation with the Southern Tenmile Recreation Access Plan is that it will limit access which has pros and cons.

The overall theme of this plan is that it will benefit an exclusive group of people - mainly visitors - yet it doesn't address a key policy of the USFS on focusing more on inclusivity and diversity. According to the USFS "National Strategy for a Sustainable Trail System" diversity and inclusivity are key requirements. This plan benefits an exclusive group who can afford to pay for parking, who have all day to deal with scheduling bus trips to trailheads or timing shuttles. Locals of Summit and Park County have been pushed out of most of these areas due to all the new restrictions. Almost all of the Southern Tenmile is restricted, from Peak 5 to Northstar. This plan thankfully does benefit a small group of local residents who live in the Spruce Creek and Quandary neighborhoods with the proposed parking restrictions and that makes sense, but for many who have recreated in all these areas for over forty years, and are just looking for a quick hike or a short bike ride before work, they are not benefiting from this plan. Let's hope that this will be addressed, especially with parking and all the parking restrictions. Prices for parking must be lowered or eliminated. Parking on some of the County and FS roads should be allowed where the road isn't in a neighborhood, and is wide enough for the shuttle or a car to drive by.

Although this plan only addresses summer, much of these proposed changes do have an impact on winter travel and those issues will be addressed below.

## SPRUCE CREEK

The new parking lot location of 78 cars is a good idea, other than when the wood piles are burned on the adjacent clear cut you could increase avalanche danger from the steep pitch above. Without those wood piles the snow becomes more of a significant slab issue. Maybe don't burn the wood piles? Please consult with Colorado Avalanche Information Center staff to see if this will indeed be a problem.

Since parking on the Spruce Creek roadside will be prohibited, and according to your numbers, this could mean a few hundred people not able to park, why not at least leave the upper parking lot open so we have 35 more spots available? It certainly can't hurt. If people do park illegally on the roadside, how will this be enforced? And where will these 100 plus people go if they can't park at Spruce Creek? Please work with the Breckenridge Ski Area to develop hiking trails, especially the trail that starts from the southside of Peak 10 and heads over towards the upper end of the Burro Trail. Parking could be near the base of the Falcon Chair. Another hike from this area

could be up Lehman Gulch.

Often the parking lot is half full when you arrive early in the morning because of people parking overnight to stay at Frances Cabin, summer and winter. Is Summit Huts helping to pay for the management and maintenance of the parking and the toilets? Will they have reserved spots for those staying at Frances? Will Summit Huts restrict the amount of parking spots available for their clients or will it be that they need the equivalent number of spots as to beds available at the hut? Also, wasn't the access to Frances Hut supposed to be from Beaver Run and starting up the Burro Trail? Years ago we had a verbal agreement to allow a few spaces at Beaver Run left open for nordic skiers using the Burro Trail, but this was never followed through.

The new proposed trail from the new lower parking lot must be designed with nordic skiing in mind since Spruce Creek Trail is a major ski destination. Nordic skiers need a wider footprint and please limit the amount of sharp corners. The straighter the trail the better it is for skiing. Do not border the trail with logs or rocks since often skiers have to go off trail to control speed and those barriers aren't visible with a little snow coverage and are dangerous. Also whenever the trail gains elevation, keep the footprint wider and straighter so skiers can wedge uphill and snowplow downhill. Keep these tips in mind for all the trails being built in this project. Please try to avoid using machines to build these trails since they tend to make the trail too wide and unnatural.

The re-routing of the 1.2 miles of the wheeler trail north of Crystal Creek Trail is an ambitious undertaking. Keep in mind that this is one of the best mountain bike descents (heading south from Peak 10) and while some sections are unrideable, most of it is fine to descend. Please keep the trail skinny and if it is machine built, keep the footprint narrow. (This section of the Wheeler Trail isn't used much by nordic skiers, so trail design can focus more on mountain biking and hiking needs.) The natural grasses and wildflowers are stunning on this trail and widening the trail diminishes the beauty. Machine built trails are sometimes too manmade looking and inappropriate for such a pristine backcountry setting. Your delineation of the trail on the map shows numerous switchbacks which really aren't that fun for biking and much of that re-route is on a wonderful straight section of trail great for descending. Another option would be to improve the old non-motorized jeep road that goes to Upper Crystal Lakes as another hiking and biking opportunity. With just a little trail work, this road is bikeable. It could also be an option to reconnect with the wheeler trail.

Please, no reservation system for Spruce Creek Road. Or at least keep it free with reservations and even better, have a pay station at the parking lot rather than having to plan ahead. Or leave half the spots as first come first serve. Many locals live near there and just want to take a quick walk or ride before heading back to work. Spruce Creek Trail used to be one of the best mountain bike rides but today it is literally impossible and unpleasant to ride given the number of tourists hiking.

#### LOWER MCCULLOUGH GULCH ROAD

While the proposal to realign the 1.3 mile Lower McCullough Gulch Trail sounds nice, this road isn't such a bad experience. Building a new trail off to the south on the other side of the creek will have to be heavily switchbacked since it is steeper on that side and also in dense spruce and fir forest. There are a few social trails

in that area already and they are really only suitable for hiking and snowshoeing and are too steep for mountain biking and nordic or backcountry skiing, especially for descending on skis. Maybe a few alterations on the existing road would be easier than building a new trail. Also if a new trail is built, please do not decommission the road. In the winter, this road is the best way to descend on skis. Skiers need a wide path to snowplow on a steep pitch. Nordic skiers or skiers with skins are more likely to skin up this road than a narrow twisty singletrack. If it is decommissioned, please do not cover it with big logs so we can still ski it in the winter. These big logs often take awhile to be buried under snow and are hazardous to navigate for a skier coming down this road, especially since this road is a good early season ski destination.

Please do not include Lower McCullough Gulch Road in the parking reservation system. It is never that full. There needs to be some areas where locals can still park without restrictions to access the Southern Tenmile Range.

#### UPPER MCCULLOUGH GULCH ROAD

Yes, McCullough Gulch Road did have traffic and parking issues before the shuttle and reservation system was in place. But there never was an attempt to manage the parking at the end of the road and instead the restrictive shuttle system was put in place with a long walk on a road before reaching the true trail. This is a huge loss for many of us. Why not eliminate the shuttle and instead, starting at the western end at the beginning of the McCullough Gulch Trail, heavily sign the north side of the road as 'no parking' due to the steep dropoff on that side. And allow parking on the south side. Have a turn around spot marked at the end of the road enforcing no parking with fines if the turn around is blocked. Mark the north side of the road as no parking all the way to the top of McCullough Gulch Road where it starts to descend towards Blue Lake Road. The biggest problem in the past was when cars were parked on both sides of the road and sometimes it was a tight squeeze to drive through. Also there was no official turn around spot but overall it wasn't so terrible that it needed to be shut down, just needed management.

The proposal to make the current shuttle turn around spot as another location for 12 future parking spots sounds like a good idea but, again, this used to be a spot where locals would park to take a quick hike on the two trails that leave from there. Please leave these 12 spots open as first come, first serve and if you have to charge, have a fee station right there and keep the fee to a minimum since those parked there aren't using the shuttle. There is a trail that starts near this shuttle turn around spot that was built by Town of Breckenridge in the mid 1990's. It is a short section of the old Wheeler Trail that contours around to the south and connects to a jeep road. We biked all of this until the jeep road was smothered by downfall after a huge blowdown in this area in 1997(?). This section of trail deserves to be incorporated into the future Wheeler Trail.

Please leave the road that connects Upper McCullough gulch Road to the Lower McCullough Gulch non-motorized road free from restrictions. It is a rough 4WD road and very few head down it, but there are a few pull-offs for parking and and it is one place where locals can be assured of being able to park and take a hike. In forty years of driving this road, I rarely encounter another vehicle. Maybe the campsites can be reduced, but still provide a place for free day parking.

Another thought is to allow some parking along the Upper McCullough Gulch Road on the first 1.6 miles of the road to the top of the climb. There are sections of that road that are very wide and what harm can it do to allow parking? Only allow parking on one side of the road. This would probably start a half mile after the Quandary Trail turnoff where the road widens and stays somewhat wide to the top, about 1.5 miles. Yes, it is a county road, but there are no homes on it. There are a few side jeep trails that are fun to bike, run, hike and ski and have been used for many years by locals.

The reason there is so much trail braiding on McCullough Gulch trail is because it gets heavy use before the snow melts and parts of the trail are still buried in snow early/mid June and one can't see where the trail goes. So instead of following the summer trail they create new trails trying to walk around the snow. A lot of work was done to eliminate the braiding about fifteen(?) years ago, but when it is half covered in snow, it didn't help and people kept walking around the snowpiles. It might be worth checking out this trail early June to figure out new alignments. The trail needs blue diamonds so that when there are snow patches, one can follow the blue diamonds.

Before there was a gate across the bottom of McCullough Gulch Road (CR 851), we were able to drive this road by mid May when the snow had melted. Skiing the north side of Quandary is very popular and routes are in skiing guidebooks. Now the gate stays closed until the shuttle starts in June. Also the road is sometimes plowed before the gate is open, so after skiing the north side of Quandary, you have to walk back on the road. Please, one thought is to open the gate once the road is dry (usually the second or third week of May) and allow for parking at the end of the road or at the current shuttle turn around spot since this is another location where skiers come out. Or possibly start a limited shuttle service on the road for the last two weeks of May when the road is dry and the gate is closed and parking is free at Quandary.

Conversely, this road is one of the first to hold snow for nordic skiing by mid October. But the gate stays open until November 15 (?). Invariably, someone will try to drive up the road after the first snowfall and get stuck. While this might be kept open for hunting, if the road is not driveable, the gate should be shut. It is the first place in the Upper Blue where nordic skiers can go. The road is smooth and with only a few inches of snow it makes for incredible skiing.

## QUANDARY PEAK

It is good news that the local residents are finding relief from the reservation/shuttle system for Quandary. But for many of us this has only made other trailheads much busier. (Hoosier Pass, Blue Lakes, Pennsylvania Creek, Peaks Trail etc). Please, instead of focusing on an exclusive user group (tourists who have all day to hike and are willing to pay the rather expensive parking fee) the Forest Service must be more inclusive. Folks who live in Breckenridge, and all of Summit County and Park County are a diverse community but the restrictions from this reservation/shuttle system means that many are left out. Trying to figure out a shuttle schedule or the bus schedule to just get up there to take a quick hike has meant that Quandary and McCullough are off limits to many. With how crowded parking has become at Blue Lakes, Spruce Creek and Hoosier, as well as the limited access to Peak 6-10, please consider reducing or eliminating the cost of a parking reservation. Allow for some parking along the McCullough Gulch road where it is wide enough for a shuttle bus to still get through. Or bring

back parking at the end of McCullough with new strict signage and enforcement.

## WHEELER TRAIL

I have spent many hours over twenty plus years figuring out where the Wheeler trail goes and the key for me has always been finding the aging orange signs "Center Stock Driveway" which were the markers for this old trail. What you see marked as Wheeler Trail on the older maps, is not always the correct alignment, although it is close. I started this 'research' when Breckenridge Open Space and Trails included the Wheeler Trail in their first Trails Plan and it has always been a passion of mine. I also worked with FS Ranger Ken Waugh when we were going through the Travel Management Plan (2008?). I do know of a few places where we could re-route the Wheeler Trail when it crosses private property. I have skied, hiked and biked the entire Wheeler Trail from Hoosier Pass to McCullough Gulch Road. There are sections of this trail that have been abandoned but just need some clearing. There are a couple sections that I would love to show someone on your trails crew since they are on the actual Wheeler Trail but rarely see human travel, especially north of Blue Lakes Road.

I am a little concerned about the initial section starting on Hoosier Pass, because although this would be easy to improve since it is just a flat ditch, it travels through major wildlife habitat. In the winter this trail is covered in hare, fox and moose tracks. It is through prime lynx habitat of spruce and fir. Currently there are no commercial permits allowed on this side of Hoosier Pass and so there are few humans, especially in the winter while the San Isabel NF side is busy with avalanche classes, ski guiding and SAR courses. Also because the Wheeler trail at Hoosier is so flat, it could encourage downhill shuttle bikers to start there since it requires no effort to climb. One thought would be to initially use the steep FS 2 road to Silver Lake road. There is a social singletrack that descends off the Silver Lake road to the old Wheeler Trail/Ditch, which is where you could resume travel on the existing Wheeler trail. Using an existing climbing road and this social trail will protect the first section of the old Wheeler trail for wildlife habitat and reduce the temptation to make it a downhill shuttle trail.

There is one steep pitch dropping into Monte Cristo that could be difficult to design for uphill bike travel. Please keep in mind that hiking with your bike is part of the sport, and a few years ago this was actually more common and acceptable. It seems like the attitude is that if a trail is too steep, it should be closed to bikes, but the Wheeler Trail has always been on the radar of mountain bikers and significant sections of it are currently hike-a-bike, yet it still is considered one of the best alpine trails in Colorado. But on the other hand, when you do re-build sections of it (especially from McCullough Gulch heading south) if you are able to keep the grade at the standard you have for bike trails, that would be wonderful! And if it does require bikes to hike up a few short stretches, that is totally acceptable. Please do not put 'features' or 'berms' on the Wheeler Trail. It is in the backcountry and this seems inappropriate. (Surprised to see features allowed on the Broken Wheel Trail, a true backcountry trail.)

## BLUE LAKES ROAD

For over forty years, Blue Lakes Road has been our favorite destination for biking, hiking, and skiing. The access is amazing. Crowds used to be minimal. There was plenty of parking at the dam. The only issues were with the mountain goats who jumped on the hood of cars!

I understand that Colorado Springs shut down the parking at the dam for safety concerns and while it is unlikely

that this will change, it would be great if they could reconsider. There was so much parking available at the end of the road.

Blue Lakes only got crowded after Quandary became paid reservation parking. Before that, even when the new lower gate was installed, it was easy to find a place to park. The road is in bad shape and people drive it too fast.

If there are public restrooms at the Quandary Trailhead, is it necessary to have them at Blue Lakes Road as well? Maybe a sign for "Restrooms" at the bottom of Blue Lakes Road and Quandary parking so before folks drive up to the end of Blue Lakes Road they can use this restroom.

It makes sense to build a trail paralleling Blue Lakes Road to where it intersects the future Wheeler Trail, but if cost is an issue, this trail to the gate could be low priority. The terrain is also steep on the north side of the road and so the proposed trail will probably be forced to stay close to Blue Lakes Road. It might be difficult to keep it flat enough for bikes to ascend. The south side of the road does have a few animal trails but it is also prime wildlife habitat. This trail just won't see much use. Most people drive to the parking area, walk up the road to the dam or walk down to the lake and that's it.

It makes sense to close the Lower Blue Lake (850.2A) road to motorized and to camping, but please, when the Forest Plan is finally updated, please allow E bikes to use this road. E bikes are a great way to access trailheads without having another car taking up a parking space. There are no biking trails at the end of this road so it would be just a place to bike and park the bike at the end. It has always been a wonderful mountain bike ride with amazing views and gorgeous forest.

#### BLUE LAKES TRAIL and SIGNAGE

At the top of Blue Lakes Road, where the Upper Blue Lakes Trail (Monte Cristo Trail?) starts, there is a Search and Rescue sign warning people of the dangers of hiking West Ridge. There is no sign at this spot (where you walk around the edge of the dam) designating that this is also the beginning of the Upper Blue Lakes Trail. The Search and Rescue Sign, (I think a poorly designed, long winded message of dangers ahead) has a map but only shows the Quandary Trail and not even the general route towards the west ridge. It is unclear on this sign's map as to where the Upper Blue Lakes Trail is, yet this trail is what the majority of people are looking for. Some visitors who see this sign, often think that if they continue on they are entering the West Ridge area and are scared to keep going. This sign really needs to be re-done and moved. If SAR wants to make the point that it is a dangerous, unmarked trail with many folks being rescued, say that in bold letters at the beginning. The sign is too wordy and confusing. Re-locate this sign so that is on the other side of the dam. Instead replace the SAR sign with a sign and/or map stating that this is the beginning of the "Upper Blue Lakes Trail."

Upper Blue Lakes Trail could really use some work, mostly the first section that is poorly defined. More arrows and/or signs! Visitors mostly just walk on the social trail parallel to the reservoir and that gets a little rough and

confusing.

## HOOSIER PASS

Please see above for comments on the Wheeler Trail starting from Hoosier Pass. This will be an amazing accomplishment if the Wheeler Trail is finally improved! But please, even more important than the wheeler trail is to address the recreation issues, summer and winter, on Hoosier Pass.

We probably spend more time skiing, biking and hiking from Hoosier Pass than anywhere else in the Upper Blue. The parking lot is usually full during winter and summer seasons by around 9:30 am. Parking can be a bit confusing and sometimes one of the entrances to the parking lot or the jeep road are blocked. Once you walk a few feet away from the parking lot, you will find trash, toilet paper, dog and human poop. Many people who are just driving over the pass (a very busy highway) will pull into the parking lot hoping to pee as it seems like a logical place to have a restroom. Hoosier Pass desperately needs restrooms or even a couple porta potties and trash facilities. Most of the parking lot is owned by Summit County (according to my map on Gaia GPS.) Yes, the public land past the parking lot is divided between San Isabel and White River National Forest, but I don't think they own any part of the parking lot although the kiosk shows their maps so they are stakeholders. CDOT plowed the lot for years and stopped last winter but after some pressure from many of us, it finally was plowed again. Often CDOT plow drivers will pull over at the top of the pass and I bet they too would appreciate a bathroom. Maybe Town of Breckenridge, Summit County, Fairplay and Dillon Ranger Districts, and CDOT can all figure out how to pay for a couple porta potties and trash facilities. Please, please! It really is out of control.

Also, the maps at the kiosk need to be updated. I seem to remember that San Isabel had a winter map, and WRNF had a summer map. The main road from the parking lot really should be closed to winter motorized travel. It quickly gets to a point where snowmobiles would have to cross an avalanche path and then they aren't allowed to travel much further. Rarely are there snowmobiles on this road and it won't be a huge loss. This is mostly an issue for the Fairplay Ranger District side but it does attract illegal motorized travel on the Dillon side.

All Trails publicizes a hiking loop from Hoosier Pass that has attracted so many visitors. Often people will "is this the loop hike?" There are no signs marking this loop hike and maybe if Fairplay and Dillon Ranger Districts do not want to sign the loop, could you reach out to All Trails and ask them to remove this hike? Just walking up the jeep road out and back is a great suggestion.

## E BIKE ACCESS

With so many of the parking restrictions in the Southern Tenmile, it seemed like a great idea for us to buy E Bikes to use for trailhead access. Also, we wanted to use it to ride up the rougher roads (Spruce Creek, Blue Lakes Road, Crystal Lakes Road, McCullough Gulch Road) to get closer to the higher elevation hiking trails.

This summer we E-biked from town and up Spruce Creek Road with the intention of going all the way to the Mohawk Lakes Trailhead. I was surprised to see a new gate just past where the Wheeler Trail crosses Spruce Creek Road. I have driven this last section of road for thirty years to backcountry ski in the spring and to quickly access the higher elevations above Mohawk Lakes. I was surprised and saddened to see this gate. While I understand that parking was probably an issue at the end of the road for Colorado Springs, it was a real bummer to see that the road is closed to motorized and E-bikes. Please, let us ride our E-bikes to the end of this well used road. One less car parked at Spruce Creek or driving that nasty 4WD road is a good thing! If the intention was also to reduce human impact, I can assure you that there will be plenty of hikers and bikers still walking the road and only a few E bikes would use it.

While I understand that the USFS had to make a quick decision without much public comment to designate E bikes as motorized, I hope that, similar to mountain bikes being given the term 'mechanized', E bikes will also have their own separate category. E bikes are much different than a dirt bike for instance. And while I am hesitant to go so far as to allow E bikes on singletrack trails, I do think that old roads which are now closed to motorized should be an exception and are the perfect solution to give E Bikers a place to go. (The end of Peru Creek Road comes to mind.) There are quite a few roads that have recently been gated in Summit County that are now closed to E bikes and while I will save that list for another time, there are quite a few within the Southern Tenmile that I will list below.

I hope you will reconsider opening to E Bikes the following: 850.2A (off of the Lower Blue Lake Road and a great mountain bike ride as well) the upper part of Blue Lakes Road to the dam, (past the gate where the new parking area is), Lower McCullough Gulch Road (which used to be open to motorized just a few years back), all of McCullough Gulch Road (the new gate by the shuttle turn around says no E bikes), the Aquaduct Road that leaves Spruce Creek Road and joins Crystal Lakes Road and lastly the upper part of Spruce Creek Road to the Mohawk Lakes trailhead.

Thanks so much for allowing us to comment. Please feel free to call or email me with any questions. I would love to help out with the realignment of the Wheeler Trail from Hoosier Pass to McCullough Gulch.

Photos below: Wheeler Trail "Center Stock Driveway" sign; Quandary Peak West Ridge SAR signs; biking the Wheeler Trail

Sincerely,

Ellen Hollinshead