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Mosquito Range Heritage Initiative (MRHI)

December 18, 2020

Diana Trujillo

Supervisor

PSICC Forest & Grassland

2840 Kachina Drive

Pueblo, CO 81008

RE: Objections to the Draft Record of Decision, Pike and San Isabel National Forests

Dear Ms. Trujillo,

The Mosquito Range Heritage Initiative (MRHI) would like to submit our objections to the DROD. We previously submitted our comments to the Draft Environmental Impact Statement for the designation of motor vehicle use and identification of the minimum road system in the Mosquito Range area of the Pike and San Isabel National Forests in November 2019.

MRHI is working to protect areas of rare and fragile ecosystems and places of historic and cultural importance, at times helping the FS to close access in order to preserve these areas. We represent the local community with a balanced mission to maintain recreational opportunities while protecting the unique natural and historical resources. It is very important to our members to maintain public access both motorized and non-motorized to our mountain backyard and to reduce impacts from overuse and misuse. MRHI actively collaborates with the South Park Ranger District to restore and maintain trails and roads. We are the boots on the ground working to reduce natural resource impact and improve trail conditions. Our seasonal natural resource staff and volunteer members are the eyes and ears on the ground in the District performing rare plant research, maintaining trails, closing illegal roads and educating the public.

Our general comments include:

\*Something that seems to be missing from this Plan is what happens to a decommissioned road. Will decommissioned roads remain open as a single track trail for non-motorized users or closed to all access?

\*We urge the USFS to maintain any decommissioned road as a legal system trail open to non-motorized use. Please consider conversion to a single-track trail open to non-motorized use rather than full decommissioning.

\*Firewood Cutting: Some of the roads that are being decommissioned, are used to gather firewood. Closing these roads will allow more deadfall to remain in the forest. Do you really want dead trees to continue to accumulate on the forest floor in these times of severe drought?

Following are our specific objections to Alternative C that affect roads in the South Park Ranger District and specifically in the area of the Mosquito Range.

\*FSR 10.A HANGING TREE This road is recommended to be decommissioned under the proposed alternative. This road is heavily used by our local community for hiking, biking, cross country skiing, snowshoeing, and firewood gathering. It also allows for USFS access to Loveland Mountain and connector trails to FSR 192 and 450. We urge the USFS to maintain this as a system trail for non-motorized use. We also recommend that the parking/pull off from CR 10 be maintained as a parking area for this heavily used forest access.

\*FSR 175 BREAKNECK PASS It appears that after mile 5.84 this road is slated to be decommissioned as part of the proposed alternative. Please consider conversion to non-motorized rather than full decommissioning.

\*FSR 183 BEAR PARK in Beaver Creek drainage is proposed to be decommissioned. MRHI currently holds a special use permit to use this road for our annual mountain bike and cross-country ski events. This is alternative access to non-motorized trail 747. This road is used for hiking, biking, skiing, snowshoeing, snowmobiling, hunting, camping and motorized vehicles. We recommend this road be open to ALL USERS. As an alternative please consider conversion to a non-motorized trail rather than full decommissioning.

\*FSR 184 RIDGE road in Beaver Creek is proposed to be decommissioned. MRHI currently holds a special use permit to use this road for our annual mountain bike and cross-country ski events. This is a very important trail for our local community and is heavily used by both the motorized and non-motorized community. We recommend this road be open to All USERS. We understand that this road crosses Beaver Creek in two locations and recommend that these crossings are partially hardened to prevent trail widening and resource damage. As an alternative please consider conversion to a non-motorized trail rather than full decommissioning.

\*FSR 192 TABOR and 450 LOVELAND are proposed to be changed to special use permit only and to be decommissioned. These roads are heavily used by the local community as both motorized and non-motorized year-round access to the Loveland ridgeline. These are important connector roads between Buckskin Gulch (CR 8) and Mosquito Gulch (CR 12) and have been in use for over 100 years as a pass between the two drainages. These roads are very important to our locals and are used for skiing, hiking, hunting, mountain biking, equestrian use, as well as motorized use. FSR 192 and 450 are also important winter trails used by snowmobiles, snow cats, skiers, and snowshoers. We recommend these roads be open to ALL USERS. As an alternative please consider conversion to a non-motorized trail rather than full decommissioning.

\*Road 196 SILVERHEELS CREEK this is a 2 track that ascends the ridge from the Gold Dust trail toward Trout Creek, this would be part of the trail system that would connect the 747 trail (Beaver Creek boardwalk) all the way to Boreas Pass, there is currently no motorized access to this trail. Please consider conversion to a non-motorized system trail rather than full decommissioning. This is a critical connector trail from Trout Creek to the Gold Dust trail, that will allow for non-motorized recreation from the Beaver Creek drainage all the way to Boreas Pass, a priority trail system for the South Park Ranger District. Please do not decommission, it's currently a wonderful hiking trail.

\*FSR 407 HOOSIER PASS OVERLOOK This road is set to be decommissioned under the proposed alternative. This is a heavily used area for recreation including skiing, snowshoeing, hiking. We recommend this trail be kept as a non-motorized system trail.

\*FSR 449.A DRAKE is set to be decommissioned. Please keep it open for skiing, snowshoeing, hiking, mountain biking, and equestrian use.

\*FSR 450 LOVELAND we recommend this road be open to all users; alternatively please convert to a non-motorized trail rather than decommissioning. See comment above regarding the importance of this road in connection with FSR 192.

\*FSR 453 TOMBSTONE is proposed to be decommissioned. This trail connects CR 8 Buckskin Gulch road to Windy Ridge Road FSR 787. This is a very important trail to the local community. This trail accesses 10 acres of open space land purchased by the Town of Alma/Alma Foundation. This trail allows for secondary access to the Buckskin Gulch Cemetery. The Alma Foundation currently holds a permit to host its annual Race in the Clouds mountain bike race along this trail. It is critical this trail remain part of the USFS trail system open to non-motorized use. Please consider conversion to a non-motorized trail rather than full decommissioning.

\*FSR 603 PEERLESS This trail is proposed to be converted to a special use permit only road and removed from the NFS system. This road allows for access to Horseshoe Lake. It is critical that this road remain open to the public. This amazing geological feature is a highlight of the Mosquito Range and this road is the only access to this area. We strongly urge the USFS to maintain this road with some form of public access. Our organization has observed natural resource damage resulting from off trail motorized use, however, we believe this area should be open to motorized users to allow for access to Horseshoe Lake by all ages and abilities. Please keep this road open to at a minimum highway legal vehicles only. It is critical this road be open to allow for access to Horseshoe Lake and those climbing Horseshoe Mountain. Please consider an alternative special use permit closure location that would still allow public access to this special area. Perhaps closing the road at the Lake

could be an alternative.

\*FSR 659 and 669 we support the proposed seasonal closure to reduce natural resource damage in shoulder seasons as well as promoting wildlife habitat.

\*FSR 669.2B TILLY This road is proposed to be decommissioned. The location of the closure is arbitrary (does not end at a distinct land feature or trailhead) also this closure location is a widened section of road that will be difficult to close. This closure will be difficult to maintain and may result in further natural resource damage by users bypassing the closure. The current end of the 669.2B road is an appropriate place to end the road, it allows for access to Mount Silverheels as well as non-motorized trail 748 Crooked Creek Trail. We recommend this road 669.2B be open to highway legal vehicles only to be consistent with the permitted use of 669. As an alternative please consider conversion to a non-motorized trail rather than full decommissioning.

\*FSR 689 ALMGREN, This is a trail currently open to motorcycles. You are recommending to make a temporary seasonal closure permanent. We request that this remain open to motorcycles and hikers, mountain bikers, equestrians, skiers.

\*FSR 787 DOLLY VARDEN This road is recommended to be added to the USFS system for all vehicles. This road allows for motorized access to fragile alpine tundra. It is important that the addition of this road as open to all motor vehicles does not result in increased natural resource damage. Therefore, we recommend that the maintenance schedule for this road be increased to a minimum of every 5 years and monitored closely to ensure the alpine tundra is protected.

\*TRAIL PA 5 The proposed alternative recommends opening a new motorized trail PA 5. This route was previously closed by the USFS and volunteers. Please consider the hard work and resources that have been committed to this closure. Please do not reopen any route that was previously reclaimed and restored. The Mosquito Range is heavily used by both locals and visitors to the area. With its close proximity to the Front Range, it continues to see more and more use. It is important the local ranger district have the authority to monitor and adapt the travel management plan to allow for public access and protect our important natural resources. We believe it is both appropriate and necessary to include a monitoring and adaptive management framework on par with forest plan monitoring.

Thank you for your time and consideration,

Jara Johnson  
Mosquito Range Heritage Initiative President