

Data Submitted (UTC 11): 3/23/2023 6:00:00 AM

First name: Miles

Last name: Cottom

Organization: Envision Chaffee County

Title:

Comments: I Overview Envision Chaffee County appreciates the care and general direction of the USFS Notice of Proposed Action (NOPA) on camping management and would like to add suggestions for additional protections related to human-caused wildfire risk and natural resources, as well as options for more management and implementation. Envision's intent is to provide data relative to how USFS's camping management proposal fits objectives outlined in the 2021 Chaffee County Outdoor Recreation Management Plan (Chaffee Rec Plan). Envision was convened by decree of the Chaffee County Board of Commissioners and facilitated the Chaffee Rec Plan. The Plan was developed via a 29-month process engaging over 64 user groups and more than 4,000 residents and visitors. It was approved by the Chaffee County Planning Commission and adopted into the Chaffee County Comprehensive Plan in July 2021. The Chaffee Rec Plan follows best practice recommendations by the National Association of Counties (NACo). The Plan also is a pilot for the Colorado Regional Outdoor Partnerships Program created by Colorado Gov. Jared Polis in 2020 to support citizen-led collaboratives like the Chaffee Rec Council and, in the Governor's words, to "take an eyes-wide-open and locally rooted approach to ensuring we remain a world-class outdoor recreation destination while preserving our land, water, wildlife and quality of life." According to the NACo. Guidebook, counties may prepare plans that guide the management of natural resources within their borders, including priorities for recreation opportunities and infrastructure, and conservation. Comments are offered with the intent to enable the agency to coordinate land and resource management processes with the planning process/plans of the local government. II General Recommendations General recommendations are as follow: 1. Add more protections to decrease human-caused wildfire risk. Considering high fire danger caused by poor forest health and a changing climate, statewide incidences of human-caused wildfire, and community action on the Chaffee County Community Wildfire Protection Plan, Envision recommends stronger site condition monitoring criteria, decision-making triggers and adaptive tools to manage the risk. Chaffee and Lake counties have new and active community wildfire plans with map tools that include composite wildfire risk (right). These tools should be incorporated into camping management. Please see specific recommendations on NOPA tables and appendices in the "Fire Management" section below for details. Figure 1. The Composite Wildfire Risk map for Chaffee and Lake counties shows where severe wildfire poses the highest risk to community prioritized assets including human life, water, infrastructure, homes, wildlife and recreation assets. It is recommended that this be incorporated in campsite and campground design and management decisions. 2. Ensure that wildlife and agricultural operations are proactively protected. Colorado has lost an estimated half a million acres of wildlife habitat in the last decade, according to Colorado Parks and Wildlife. Local species tracking by the state agency shows that some population numbers are on the decline. To address this challenge, the Chaffee Rec Plan recommends protecting the county's highest and high-quality habitat using the Planning for Wildlife Map, which is included in the plan. The Planning for Wildlife Map is in progress in Lake and Gunnison counties. The maps should be incorporated fully into USFS's consideration of new dispersed campsites and campgrounds. See specific recommendations on NOPA tables and appendices in the "Wildlife" section below, which will help proactively sustain wildlife and ensure additional important habitat is not lost or damaged due to growing recreation development and use. Figure 2. The Chaffee County Planning for Wildlife Map shows the most important remaining habitat. This product is in progress for Lake and Gunnison counties and will be updated as needed in the long term. The Chaffee Rec Plan recommends avoiding new recreation development in highest and high-quality habitat. Envision's research shows that recreation users cause as much as \$100,000 per year in direct damages to agricultural operators, including to fences and infrastructure on public lands. Protecting these operations is a priority in the Chaffee Rec Plan, and that could be more strongly reflected in the USFS NOPA. Please see specific recommendations on the NOPA tables and appendices in the "Range" section below for details. 3. Expand the toolbox to create all potentially needed solutions, including fees. Managing the high number of designated sites and campgrounds proposed in the NOPA with current financial resources will likely not be possible. There will be a need for added staff, enforcement, site maintenance, clean up, and repairs to infrastructure and facilities. Envision recommends

the addition of campsite fees as a future option. See the "Adaptive Management Toolbox" section below for details about fees and other tools that should be considered in the future.

4. Set a meaningful pace of implementation with community help. Sustainably managing camping is a top Chaffee Rec Plan goal. The plan includes metrics to halve the impact of sites and slow growth to 3% per year by 2024. Local expectations are high and the community is supporting agency action with county funding of more than \$250,000 in 2023 for Chaffee Recreation Rangers and Recreation Adopters. Envision recommends that the USFS partner with the community and set an aggressive goal for implementation of all designated sites within 3 years. This level of schedule was achieved in Gunnison County, and could be met locally with support as needed for ongoing agency planning, cultural surveys and similar through the Common Ground Fund. We have the opportunity to get on top of impacts and create a model for successful camping management at scale and in partnership. Envision recommends adding a clear and challenging implementation timeframe target to the NOPA's Appendix B items to catalyze action.

5. Manage for a sustainable carrying capacity that supports quality experiences. The Chaffee Rec Plan seeks to find a balance among providing quality experiences, protecting natural resources and sustaining the economic benefits of tourism as outdoor recreation use grows. Unfettered growth in recreation use has been flagged by locals and some visitors as highly undesirable, due to the influence that crowding has on individual experiences. Survey data indicate that 80% of residents say local forest and wildlife health have degraded over time, citing "overuse" and "irresponsible use" as the top reasons. In addition, 70% of residents say the benefits of visitors coming to recreate do not outweigh the negative impacts. Further, more than half (53%) of residents say their experiences have diminished, the top cause being the increased numbers of often irresponsible users. Due to increased demand for outdoor experiences since 2020 associated with the pandemic, this data may under-represent the public's perceptions. Camping opportunities on USFS lands greatly contribute to the aforementioned perspectives. Demand should not solely drive agency decision-making since there really is no limit, especially as the state's population continues to grow. Camping also impacts other users, such as hiking, biking, hunting and fishing. The quality of all outdoor experiences should be considered. See specific recommendations for quality experience considerations in the NOPA tables and appendices, under the "Recreation" section below.

III Detailed Recommendations on NOPA Tables and Appendices

Table 3. Management Triggers

Envision applauds the basic elements in Table 3 that set forth decision-making triggers. In some cases, triggers could be more proactive by using lead versus lag indicators, especially where damage may be hard to reverse or incidents could result in high or unacceptable impacts to the land and the community.

Specifically:

- **Fire Management:** Envision recommends that the agency take much more proactive action to address the very serious threat of wildfire to our community from campfires. Bonfires, illegal fires and abandoned fires already have been well documented on the local National Forest. It should not be necessary for several human-caused infractions to be documented before action is indicated. A better lead metric would be an increasing number of human-created fire rings, especially in areas of high composite wildfire risk, as mapped in the county CWPPs. Envision also recommends a zero-tolerance policy, where a trigger could be "any one serious human-caused wildfire incident." Envision also strongly recommends additional fire management staff resources or partnerships to conduct more camping area patrols, especially during fire bans.
- **Public Health and Safety:** The proposed trigger relies on monitoring twice a year or more. This is not realistic considering the 3,600+ campsites monitored to date in Chaffee and Lake counties. The community does not have a system or resources in place to monitor all sites twice a year. The management trigger should be adjusted to one that is more easily tied to a static trigger related to volume, such as >1 gallon of trash or >2 human waste piles. An alternative is to change the metric to a more general timeframe, such as trash and/or human waste left at a specific area/site more than twice, removing "per season."
- **Soils:** The soils trigger is too reactive, especially if sediment transport and erosion occur. To protect clean waters, Envision recommends that "any significant erosion within 300 feet of streams, wetlands or riparian areas" be added.
- **All:** The current trigger is "two or more new user-created routes in one season," yet one route could be added each year, resulting in annual creeping impacts that are not addressed. An additional trigger, "Any site with two or more user-created routes" should be added to ensure sufficient growth management of illegal routes.
- **Wildlife:** The Chaffee Rec Plan states that new recreation development, including camping, should not occur in the highest and high remaining habitats as identified in the Planning for Wildlife Map. This should be addressed with the following text: Under "Indicators", an addition to recognize that new campsites can displace wildlife from lands, such as "new campsites

in highest or high-quality habitat", which will displace wildlife. Similarly, on the "management triggers", highest and high quality habitat should be added to the current text as follows: "increase in disturbance from VBDC and/or bare ground not revegetating in meadows, shrublands and in highest and high quality habitats where mapping is available". Envision agrees that a desired condition is "minimal loss of grass and shrubland and minimal decline in condition," and requests the add "minimal loss of highest and high quality habitat per the Planning for Wildlife Map where available". These additions would empower inclusion of features missing in the proposal, such as critical winter range, production areas and migration corridors. These habitats have been prioritized by agency biologists who created the tool. County of Chaffee is currently working to include protections of these habitats in the Land Use Code, and asks that USFS do the same.

**Range:** Specific triggers for agricultural operators on grazing leases seems to be missing, or perhaps the intent is covered under Lands and Uses. It is recommended this topic be addressed with a new row to ensure it is prioritized and clear, with this recommended text: "Existing Condition" - damage to the grazing quality or agricultural infrastructure on grazing lease areas". "Desired Condition" - recreation users have no negative impact on agricultural operators. "Indicator" - number of reports of cost/damage to agricultural assets. "Management Trigger" - Increase in disturbance from VBDC decreasing quality of forage or increased reports of cost/damage.

**Recreation:** Envision notes above that the quality of user experiences is critical and should be considered as demand for camping continues to grow. The "current condition" is stated as "demand for camping opportunity exceeds current inventory of sites". This is not currently true, except on 6 to 9 days a year during holiday weekends. The "current condition" should be restated as "High demand for sites may exceed inventory on busy holiday weekends. Increasing trash, human waste and resource impacts are negatively impacting experience quality". The "desired condition" is stated as: "facilities and available camping spurs meet the needs of visitors who are seeking a VBDC experience". Both visitors and residents have expressed more desire for quality experiences than adding more assets, and the management triggers should reflect both so that the "desired condition" is revised to read "high quality, clean facilities and available campsites meet the need of visitors who are seeking a VBDC experience in balance with users' desire to also have a degree of solitude and clean conditions". The "indicator" is stated as "Occupancy rates of developed campgrounds and designated sites at 85% occupancy during the summer". This should be clarified to "average occupancy during the summer". An indicator for sustainable management should also be added, such as: "existing campsites and designated sites are being consistently managed to provide a low instance of trash, human waste and site expansion". Campsites should not be added unless more are needed AND those already in place can be sustainably managed. Finally, the "management triggers" are to consider adding more sites and infrastructure. These are both actions and should be reflected in the toolbox, not as triggers. The trigger for action should be a combination of unmet demand and the ability to manage existing sites sustainably, such as "more than 85% of available campsites and designated sites are occupied on average at >85% throughout summer months AND those sites are being sustainably managed with low incidence of trash, human waste and expanding footprints."

**Table 4. Adaptive Management Toolbox** This is an excellent toolbox and a good approach. To make it even stronger, Envision recommends the following:

**Add fees for designated campsites and/or campgrounds** if management thresholds are not maintained after site designation and additional resources are required for enforcement, management/clean up and/or infrastructure such as restrooms. There will likely be a need for added staff (and added agency funding to make the Recreation Rangers program sustainable), enforcement, site maintenance and clean up, and repairs. Without the potential for a funding mechanism, the designated site and campground system may not be enforceable or manageable. Adding the possibility of user fees if thresholds are not met allows users to retain no-fee camping if behaviors are appropriate, but also allows the agency to add a fee if it is needed. Fees also could support campground hosts as well as additional fire patrols to ensure safety. The acceptability of this option is relatively high, as Chaffee Rec Survey respondents said they are willing to pay an average of \$44/year.

**Add the option to require removal of human waste.** In river systems across the West, portable toilet systems have become accepted practice. The option to require removal of human waste from designated camping areas should be added to the toolbox to address the case if thresholds for waste management are not met.

**Option to add new designated sites.** In Table 3 (triggers), an action to add new designated sites and associated infrastructure is suggested. This should be moved to the toolbox, as a management option to: "add additional designated sites and associated infrastructure (fire rings, restrooms, containment).

**Table 6. Proposed campgrounds and camping areas** Proposed

areas for designated camping are generally supported. The plan to address issues is appreciated and completely aligned with the Chaffee Rec Plan. Envision recommends that campground areas be carefully selected using the Planning for Wildlife Maps in Chaffee and Lake counties, to avoid new development in areas of highest and high-quality habitat as stated in the Chaffee Rec Plan. New campgrounds should be located in areas with lower habitat value.

- North Fourmile: The proposed general area for this campground is located in the top 70 to 90% of most important and most sensitive habitat in the county and in the top 90 to 100% of most important winter range. To be consistent with the intent of the Chaffee Rec Plan's goal of sustaining local wildlife, this area should be avoided for additional disturbance. Other areas in Fourmile with lower quality habitat could be considered. An added management tool could also be seasonal closure of the campground to manage for wintering wildlife. CPW collar data indicate that deer that winter in this portion of the Upper Arkansas Valley disperse across 8 adjacent counties in summer months, and so this is a regional concern.
- Avalanche and South Cottonwood: These campgrounds may also be proximal to highest quality habitat depending on their specific chosen specific location, and should be sited to avoid the most important habitat.
- Lake County: Proposed campgrounds in Lake County should also be evaluated with the Planning for Wildlife Tools to ensure they do not further fragment the best remaining habitat, and are sited in appropriate locations with lower quality habitat. The Lake County maps will be available in mid-2023.

**Additional Designated Camping Area:** One area for immediate camping designation is recommended, even though there is a small number of sites: The water source at the M&A Quarry Area near Ute Creek/Turret presents ongoing conflicts among campers, agricultural use and bighorn sheep. It is in the top 90 to 100% of habitat in the county, and should be protected. Eliminating camping at the quarry and designating sites in more appropriate locations could resolve the conflicts. This could be accomplished by continuing the proposed designated area from Fourmile/Aspen ridge south to the county road on Ute Trail (CR175), a zone with easy access that may see additional impact as the aspen ridge area is designated.

**Table 2. Site Condition Form** Envision understands that Table 2 is intended as an example vs. the actual form, but the example seems to diminish the importance of the design features provided in Appendix A by not capturing relevant information. Creating the actual form that will be used and correlating it with the content in Appendix A for the final decision is recommended to avoid any confusion and accelerate action.

**Appendix A. Design Features** Envision applauds the specific user experience and natural resource protections provided in Appendix A, particularly relative to experience quality, hydrology and wildlife. A few additional clarifications and protections related to wildlife are recommended as follow:

- Consider a design feature similar to that for elk production, winter range and migration corridors to include Mule Deer. Chaffee County provides winter range for deer from 8 adjacent counties and to be consistent with the Chaffee Rec Plan intent, these habitats should be protected.
- Consider a design feature to protect Lynx breeding habitat (spruce-fir forest above 9,000 feet with slopes greater than 25%).
- From the rule that campsites should be 100 feet from a lake or stream, remove or clarify "unless agreed upon by the appropriate FS personal", because exceptions should be minimal and therefore, clarified, so they do not become the rule.

**Appendix C. Frissell Campsite Condition Class Standard** Envision expects that the Rec Collector APP and Campsite Collector Survey will be the tool use by agency staff and trained volunteers to collect data on campsite conditions. The Campsite Collector survey is generally consistent with the Frissell Condition Class Standard except that the system has been simplified to group Frissell II and III into a single Campsite Collector "impacted" category. To ensure that Campsite Collector can be used to monitor sites with no future misunderstanding, it is recommended that language be added to Appendix C as follows: Campsites conditions will be assessed generally using the Frissell Campsite Condition Class Standards below and/or the Chaffee Rec Collector APP, which simplifies Frissell in to four categories as follows: Non impacted = class 1, impacted = class II and III, bare ground = IV and eroded = class V.

**Closing** Envision Chaffee County appreciates the work to date by USFS Staff members to create the thoughtful system represented in the camping NOPA. Our comments are intended to build upon that strong foundation with enhancements to create a system and outcomes that are successful and fully aligned with the Chaffee Rec Plan.