

Leadville District Priority routes

Support decommissioning road 381 and request converting it to a non-motorized Wilderness Trail

The road should be decommissioned as a road, except for a short 30-yard segment of route from Forest Road 390 to allow for parking. The decommissioning should convert this road to a non-motorized trail, as this road accesses three designated Wilderness Trails including trails used to climb the 14ers Missouri and Huron.

Decommissioning of this road is proposed in alternative E.

This road receives a significant amount of use by people walking on it to access the 14ers, Pear Lake, the Collegiate Peaks Wilderness Area and Clohesy Lake. Conflict occurs between hikers/horses using this route and OHVs and other vehicles on the narrow access road.

The approved reroute of the initial segment of this road now facilitates improper full sized motor vehicle use on and over 300 yards of the Elk Mountain-Collegiate Peaks Upper Tier Roadless Area. This segment of road is in the Roadless Area, and not excluded within a non-Roadless corridor.

Within the initial .25 miles of this road there are two stream crossings which are intimidating, deep and dangerous for vehicle use through most of the summer months when this road can be accessed via motor vehicles. Even in the fall low flow period, the water is over 20" deep in the ford of Clear Creek. Many users end up parking off the road right before the first Clear Creek crossings and hiking the road. It must be recognized that Forest Road 390 the Clear Creek road is a ML-3 road accessible to passenger cars, so many users do not use a specialized 4WD vehicle to access the beginning of road 381. The vast majority of Colorado and US residents do not own a specialized 4WD vehicle that might allow motorized travel on road 381. Even with 4WD, these creek crossings are formidable and intimidate many vehicle operators.

A proposal to convert this road to a motorized trail open to all motor vehicles improperly marginalizes the risks continued motorized use of this route poses to waterways.

The vehicle parking before Clear Creek results in significant vegetation disturbance in the riparian areas adjacent to the creek. Fluids such as oil, gas and antifreeze drip onto the ground from parked vehicles immediately adjacent to the creek. Some users stage OHVs at this location out of trucks, and gasoline spills from refueling those vehicles are possible.

The initial ford of Clear Creek is more than a ford, as the roadbed travels in and along the main channel of the creek for ~200 feet. There is a second creek ford of the Lake Fork of Clear Creek that has lesser but similar impacts. This route is hydrologically connected to these waterways and will remain so unless bridges are built. Hardening of one creek crossing, as suggested in the DEIS, will not account for negative impacts from the other creek crossing. Hardening of these crossings will help minimize these impacts, but not eliminate them. Noxious weed seeds, oil, gas, other engine fluids, road salts, brake dust, etc. will wash off vehicles fording these deep creeks and pollute these otherwise clean waters.

There are two other locations along 381 where the road fords surface water flows that feed the Lake Fork of Clear Creek, increasing waterway impacts.

Inadequate drainage structures on this road contribute to erosion and sedimentation directly from the road into the Lake Fork and Clear Creek.

This road has a high archaeology risk, perhaps due to the old cabins along it. Motorized access on this routes facilitates continued vandalism and souvenir removal from these historic structures.

This route does not provide legal motorized access to Clohesy Lake. Anyone wishing to view or fish at that lake must park their vehicle and walk at least one-half mile one way.

There is a large dispersed motorized campsite on the north side of this road directly before and adjacent to the initial ford of Clear Creek. Trash, human waste, ashes, disturbed soil, etc. from this site wash into the creek, especially during spring high water season. There have been problems and conflicts between dispersed motorized campers at this site and those who pay to use the Crescent Mining Camp Cabins designated/designated site just a couple hundred feet away. Dispersed motorized campers have been observed looking in windows, trying to use the restroom and collecting firewood at the mining camp cabins. Noise from conversations, barking dogs and recreational target shooting at the dispersed motorized camping site results in conflicts with those staying in the cabins.

Although not many people use motor vehicles to camp along this road south of the stream crossings, the dispersed motorized camping that does occur is often within the Collegiate Peaks Wilderness Area boundary. This road is cherry stemmed into the Wilderness with the boundary only 75 feet away, or less, from the end of the road.

Impacts from motorized use on this road result conflict with desired wilderness characteristics in the adjacent Wilderness Area. The DEIS correctly assumes at 3-37 that disturbance extends beyond the footprint of an activity. Noise, odors, and the visual appearance of motorized vehicle use and this associated with this road extends far beyond the route itself into the adjacent Wilderness area. This results in conflicts with those seeking solitude, primitiveness, untrammled land and other desirable Wilderness characteristics.

Motorized use on this route will also continue to displace wildlife. This includes displacement of bighorn sheep from over 1500 acres of Colorado Parks and Wildlife identified sheep summer concentration area. This route also slices across .35 miles of a narrow .5 mile wide CPW identified elk migration corridor.

Boreal Toads, a State of Colorado Endangered Species and identified as a Tier 1 Species of Greatest Conservation Need in the 2015 Colorado State Action Plan, have also been recently known to occur within the Clear Creek drainage. Continued motorized use of this route could negatively impact water quality of toad breeding sites, and toads are at risk from being killed in collisions with vehicles.

Although a seasonal closure may help minimize the high risk this route poses to wildlife, it is difficult to evaluate this as the DEIS does not provide details of how and when this closure will be seasonally implemented.

There is no guarantee of continued outside assistance to help maintain this route if converted to a motorized trail. The Leadville District has never received any State OHV grant funding, and does not have a motorized trail crew. It will be difficult for this District to obtain the long-term sustainable funding needed to properly maintain this trail. The special interest motorized group that has been reportedly allowed to adopt this route was recently formed and very small, and does not have a long-term sustainable record of volunteering with the USFS.

Public motor vehicles continue to use the final .45 mile long segment of the administrative route/designated trails that extend beyond the currently open segment of this road. Vehicles have been observed and documented ignoring recently installed signs meant to deter this use. We support decommissioning of this road as proposed in alternatives B, D and E. Decommissioning should be accomplished in a manner that preserves use by quiet trail 1461 overlayed on this now administrative road.

This road was originally existed, and was excluded from the Wilderness boundary. in order to facilitate access to a private inholding and cabin. The cabin burned down and the USFS now owns that previously private land. That land and cabin were the primary reason this road was excluded from the

Collegiate Peaks Wilderness Area. Since conditions have changed and the private land and cabin are no longer there, there primary need for this road no longer exists.

Convert the final 2.03 miles of Road 398 to a Special Use Permit road

This segment of road extends into a 3A semi-primitive non-motorized management prescription area, where public motor vehicle use is never allowed according to the existing Forest Plan. Non-motorized recreation is to be emphasized in 3A management prescription areas. Eliminating public motor vehicle use on this route will significantly preserve and enhance quiet use recreation in this area.

Route 398.A can only be legally accessed by motor vehicle use by using route 398, so any modifications to route 398 also apply to route 398.A.

Continued public motorized use on this route results in conflicts with quiet use/non-motorized recreationists seeking non-motorized desired recreational experiences such as hiking, mountain bike riding, wildlife watching and hunting.

The Leadville Trail 100 mountain bike race uses this route, and thousands of riders train, race, tour and participate in permitted events on this route each year. The extremely high elevation and steepness of this segment combine makes this the most difficult part of the race course. These riders would benefit greatly from riding over 4 miles (out and back) on a route free from dust, emission pollution, tread disturbance, the sights, sounds, smells and physical presence of motorized vehicle use in this area.

It must be noted that as a special use permit road, a limited amount of race support and other permitted event use by motor vehicles would still be allowed on this route. Permitted vehicle access would still be allowed for private land owners and other administrative uses. These types of motorized use are allowed in 3A management areas.

There is an existing cleared and used vehicle turn around point on USFS land just to the northeast of the point where this route enters the 3A area. This is, was and could be used for vehicle turn around and parking if a locked gate was installed to implement the proposed conversion of the end of this road to special use permit vehicle access only. A stepover could be installed next to this gate, which would allow quiet use access.

There is a large amount of unauthorized motorized use occurring off Forest road 398 in alpine tundra areas, 3A areas, on private land, and in the Elk Mountain-Collegiate North Roadless area. The installation of a locked gate as described above would effectively stop all this damaging illegal use, which would otherwise require a significant investment of time, funding and structures to control.

This road segment is within Chaffee County, and a significant amount of illegal unauthorized OHV occurs on private land in this area. Continuing to allow public motor vehicle use on this segment of road 398 facilitates illegal OHV use on private land, which is prohibited by Chaffee County ordinance 2012-02, Section 2.03 (d).

The Leadville TAP report rated this road as having HH impacts to wildlife. This road segment fragments identified bighorn sheep winter range and a sheep summer concentration area. As motorized disturbance extends beyond the footprint of this route, continued motorized use also negatively impacts a sheep production area. Although a seasonal closure of this route is proposed, it is difficult to evaluate how effective that closure will be without specific information on how and when this will be implemented.

Years of mismanagement by the USFS, and an unwillingness on the part of the agency to admit past errors and enforce its own regulations, have provided the public with the misperception that unauthorized motorized use is acceptable on this route.

We believe the problems started when this was a Chaffee County Road accessing an active mine, and the USFS was not paying attention to or monitoring unauthorized motorized use beyond the county road end and private land.

This segment of road was clearly depicted as being closed to public motorized use on the 1984 travel map. This section of route was depicted as a trail, not a road, on that map. We oppose rewarding illegal and unauthorized behavior by allowing this road to remain open to public motorized use.

Converting this route to a SUP route is proposed in alternative E.

Oppose reduction of 3A area lands in the Road 398 area via a Forest Plan amendment

We strongly oppose any Forest Plan amendment that could convert 438, 531 or 631 acres of 3A non-motorized land to some other management prescription to allow public motorized use in this area. We believe the prevalence of quiet use in this area makes the continued allowance of motorized recreation in this area a very substantive issue. Converting any segment of land specifically prescribed to be managed for quiet use recreation to an area where motorized recreation will be allowed is very controversial.

This proposed amendment will convert lands currently managed for quiet use recreation to lands emphasizing motorized recreation. The proposed amendment will improperly apply non-conforming motorized management to Elk Mountain-Collegiate North Colorado Roadless Rule area.

One can imagine the uproar and controversy if a proposal was made to convert a management area where motorized use was allowed, emphasized and common to a management area where motorized use is prohibited and existing motorized use was eliminated.

There are ample other locations and areas throughout the forest where motorized recreation is specifically allowed. Management areas outside of Wilderness where motorized recreation is prohibited are relatively scarce on the forest, according to Table III-3, page III-84 of the current Forest Plan. As an example, there are over three times as many acres of 2B semi-primitive motorized managed land as there are acres of semi-primitive non-motorized land on the forest.

As previously noted, this area is a popular area for mountain bikers. The 3A land prescription and designation is particularly important to mountain bikers, and unique, as it is the only land area on the forest where mountain bike use can be emphasized and experienced without intrusions from motorized recreation. Mountain bike use is not allowed in management area #8 Wilderness, the other prevalent management area where motorized use is prohibited.

We disagree with some of the determinations made for screening criteria for this area in Table 3-69 on page 3-212 of the DEIS. We have noted the invasive plant species Canada thistle (*Cirsium arvense*) in this area. Continued public motorized recreational use in this area will contribute to the spread of this and other invasive species.

The segment of route 398 within this 3A area proposed for conversion is not within three miles of a gateway community. If Granite can be considered a gateway community, this route segment is located 8 miles by road and over 4 miles directly from Granite. This route segment is located many miles by road, and over 4 miles directly from Twin Lakes.

This route and area is used as a special use permit route, as part of the permitted course of the Leadville Trail 100 bicycle race.

Some of the 3A area lands proposed to be converted to 2B management area lands are within the Elk Mountain Collegiate North Roadless Area.

We believe there are other flaws with the proposed conversion of this area from 3A land to other management prescriptions.

The 3A areas proposed for conversion in Table 3-68 on page 3-211 of the DEIS (631 or 498 acres) do not coincide with the size of the 531 acres of the proposed for conversion 3A area indicated by GIS data supplied with this proposal.

Approximately 178 acres of the 531 acres of 3A area proposed for conversion to 2B is private land. The USFS does not have jurisdiction over private land, and cannot propose or require management of private land adjacent to forest land.

We question why the boundary line of 3A area proposed to be converted to another management prescription is setback so far away from roads 398 and 398.A proposed to remain open. The setback for the new proposed boundary of the 3A area would be over 940 feet away from route 398.

We believe this large distance setback is excessive, and represents a type of unnecessary land grab indicative of a possible bias favoring motorized recreation.

There are numerous other examples of 3A area boundaries on the PSI that are much closer to roads. On the Salida District, the boundary of a 2567 3A area is only 125 feet from the north edge of County Road 162 in one location. The boundary of the same 3A area under consideration here is only 180 feet south of Highway 82 in one location. There are numerous examples of other 3A areas whose boundaries are even closer to designated open routes, such as on the South Park District where the western boundary of a 4004 acre 3A is directly adjacent to a private land access road on forest land just east of Forest Road 211.

Other boundary setbacks should have been considered in order to offer a sufficient range of alternatives for modification of this 3A area. A setback coinciding with the Roadless Area boundary, ~300 feet, should have been considered. This 300 foot new boundary setback would convert ~150 acres of USFS 3A land to 2B management area land. A 100 foot setback, as is a standard for Wilderness Area boundaries, could have been another alternative, resulting in less than 100 acres of USFS 3A managed land being reduced.

Support decommissioning or convert to administrative road for 110.J South Halfmoon

We oppose the conversion of 3A management area land where quiet recreation is emphasized to motorized management in order to accommodate damaging motorized use on the west side of Mount Elbert.

There are extremely high watershed impacts associated with this road, as it fords Halfmoon Creek and South Halfmoon Creek numerous times. A proposal to convert this road to a motorized trail open to all motor vehicles improperly marginalizes the risks continued motorized use of this route poses to waterways. This route is hydrologically connected to these waterways and will remain so unless bridges are built. Hardening of these crossings will help minimize these impacts, but not eliminate them. Noxious weed seeds, oil, gas, other engine fluids, road salts, brake dust, etc. will wash off vehicles fording these deep creeks and pollute these otherwise clean waters. With high spring runoff flows will destroy the hardening of creek crossings unless difficult, expensive and damaging efforts to divert the creeks to install concrete are used.

Decommissioning of this route is proposed in alternative E.

In 3A area.

Unauthorized use extends into Roadless Area.

Support decommissioning of 135.A Mt. Arkansas road.

Alternatives B, C, D and E.

In 3A area.

Recommend decommissioning of segment of Forest Road 109 beyond intersection with 109.A

This road segment is not on the current Leadville District MVUM. It is not included in 2019 Leadville District route GIS data. It is in the Chicago Ridge Roadless Area. It has been closed on the ground by the Leadville District.

All the alternatives that indicate this segment of route is open to motor vehicle use are incorrect.