

## Salida District Priority Routes

### **Support keeping Road 225.F closed to public motor vehicle use to preserve the Continental Divide Trail**

We support retaining administrative road 225.F as a route closed to public motorized use as proposed in Alternatives A, B and E.

We oppose proposals in Alternative C and D to open this road as a motorcycle trail.

This route is currently closed to public motorized use by locked gates at either end.

This route directly connects to the Continental Divide National Scenic Trail (CDNST) on the Gunnison Ranger District. Motorcycle use on 225.F continuing on the Gunnison District must use the CDNST, as the other road type routes in this area are closed to public motor vehicle use.

An increase in motorized and bicycle use on this segment of trail, including the potential for new hybrid motorcycle loop routes, will increase conflict on a popular segment of the CDNST and substantially interfere with the nature and purpose of the CDNST. The nature and purposes of the CDNST are to provide high quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.

Motorcycle use on 225.F is in the CDNST corridor, and the potential of this additional use displacing and negatively impacting wildlife in that corridor must be considered. Motorcycle use will substantially interfere with the conservation of wildlife in the CDNST corridor.

To protect the values for which the CDNST was designated, motorcycle use on 225.F could conflict with the nature and purposes of the CDNST, and motorcycle use on 225.F can be allowed only where there is a determination that this use will not substantially interfere with the nature and purposes of the CDNST.

The 2010 Gunnison Travel Management Plan decision and finding that motorized use on this segment of the trail is ok and does not result in substantial interference was successfully appealed. The USFS was directed to further analyze the CDNST in this area to determine if motorcycle use substantially interferes with the nature and purpose of the CDNST. A decision to open 225.F to motorcycle use should not be made until the Gunnison Ranger District and Gunnison National Forest complete that required analysis.

Adding new public motorized access and use in (see Putative Canada Lynx (*Lynx canadensis*) Movements across Hwy 50 near Monarch Ski Area online at <https://cpw.state.co.us/Documents/Research/Mammals/Publications/LynxMovementsNearMonarchSkiArea.pdf#search=monarch> ) Opening this route to public motorcycle use could result in additional dispersed camping in this area, and that overnight occupancy could result in negative impacts to lynx movement in this area.

We question the value of this route for motorcycle use. Unlicensed dirt motorcycles will only have dead end out and back access to 6 miles of roads 225.F and 225 if 225.F is opened to their use. That minimal distance would not provide significant desired riding opportunities.

It would be possible that motorcycles could use this route to access designated Gunnison District motorized trails by parking and staging along road 225 in the Fooses Creek area. There are no suitable parking and staging areas on USFS land along the Fooses Creek Road. The area used as a winter trailhead north of the trailhead is actually on bordered by private land along Chaffee County Road 225. County Road 225 is not open to use by unlicensed vehicles such as dirt motorcycles, so they could not park here and ride the county road to USFS 225 at the top of the hill near Fooses Reservoir. Noise from

motorcycle parking, staging and use at this location would negatively impact a private residence just over 200 feet away.

There are better and more easily accessed opportunities for motorcycle related parking and staging at the summit of Monarch Pass and intersection with Forest Road just a few miles away.

Parking and staging along the rest of Forest Road 225 would result in crowding and conflict with other forest users in an area already popular for dispersed motorized car camping. The Colorado Trail is overlaid on the lower section of road 225 for over 2 miles, and increased motorcycle use will result in conflicts with trail users.

The northernmost two mile segment of Forest Road 225 is a ML-3 road open and maintained for passenger car use. There is very little unlicensed OHV mixed-use on this road as it is. Opening 225.F to unlicensed motorcycle use could increase the amount of unlicensed OHV use on this portion of 225. We believe a mixed use analysis should be conducted on that segment of 225 to determine its suitability for this potential increased motorcycle use before 225.F is opened to motorcycle use.

Motorcycle use on 225.F will reward illegal and unauthorized behavior, as some renegade motorcyclists have continued to bypass the locked gates and illegally ride on 225.F

### **Support converting trail 531 Monarch Ridge to a non-motorized trail**

This is proposed in Alternative E. This is part of the Continental Divide National Scenic Trail. Motorized use can only be allowed on this trail if it does not substantially interfere with the nature and purpose of that trail.

Continued motorcycle use on the segments adjacent Gunnison District CDNST was successfully appealed as part of the 2010 Gunnison TMP. The USFS was directed to further analyze the CDNST in this area to determine if motorcycle use substantially interferes with the nature and purpose of the CDNST. A decision to open trail 531 on the Salida District to motorcycle use should not be made until the Gunnison Ranger District and Gunnison National Forest complete that required analysis.

To protect the values for which the CDNST was designated, motorcycle use on 531 could conflict with the nature and purposes of the CDNST, and motorcycle use on 531 can be allowed only where there is a determination that this use will not substantially interfere with the nature and purposes of the CDNST.

Page 4 of the Pike and San Isabel National Forests Public Motor Vehicle Use Environmental Impact Statement Designated Areas Report states, in reference to the National Scenic Trails Act, "This act established the Continental Divide National Scenic Trail, which passes through the PSI. The trail is a non-motorized use trail."

### **Support decommissioning of a segment of Forest Road 184 the Turret Trail in Browns Canyon National Monument**

This dead end road passes into the heart of the upper tier Aspen Ridge Roadless Area, which makes up the majority of the land within Browns Canyon National Monument.

Much of the land within the Monument has been included in numerous Wilderness bills, which were unable to pass through Congress. All of these bills have included a compromise that closed the northern half of FR 184, while keeping the first part of this road open. Although a National Monument has been created, much of this area still qualifies for Wilderness designation.

This compromise leaves the higher elevation segments of this road open to provide ample motorized recreation opportunities and expansive views

The 2019 Colorado Wilderness Act proposes a Browns Canyon Wilderness that closes the last half of this road to motorized use. The proclamation that created Browns Canyon National Monument kept the option of closing this road as a possibility.

The final 3+ miles of FR 184 receives relatively little use and intrudes into important habitat for elk and bighorn sheep. Over 20 miles of unauthorized motorized use within the Monument associated with the end of this road has proven difficult to manage and control. Much of this unauthorized use occurs within the BLM Browns Canyon Wilderness Study Area on designated non-motorized trails.

Request that the USFS close the Turret Road 184 just before it enters Greens Gulch to protect the Browns Canyon Monument area and facilitate Wilderness designation.

### **Support keeping PA 6 closed to motorcycle use**

This is proposed in Alternatives A, B, C and E.

Opening this route to motorcycle use will negatively impact and conflict with cattle grazing and cattle. This route is used as a stock driveway and cattle frequently use this route and surrounding areas during seasons when motorcycle use will be most prevalent. Grazing permittees drive stock on this route on horseback, and public motorcycle use on this route will likely disturb, disrupt and result in conflicts with use of this route as a stock driveway.

Motorcycle use on this route will conflict with its use under a special use permit for group hikes and backpacking to climb Mount Ouray.

Motorcycle use on this route will reward illegal and unauthorized behavior. Despite the posting of signage on this route, renegade dirt motorcycle riders continue to illegally ride this route.

Motorcycle use of this route will negatively impact Little Cochetopa Creek, which this route fords near Forest Road 210.

The value of increasing motorcycle access to Forest Road 210 is limited. Once motorcycle riders access Forest Road 210 the Little Cochetopa road, they can only legally ride ~ 2 miles south to the end of this road at a quiet use trailhead. The legality of riding unlicensed OHVs on the road across State Trust Land which begins just ¼ mile to the north is questionable. OHVs are not permitted on County Road 210 north of the State Trust Lands. There is no legal unlicensed dirt bike connection with this route to other legal USFS and BLM OHV routes such as Spruce Creek 214 and Pass Creek 212 to the north. Opening this trail to motorcycles will place additional burdens on the county, private land owners, and other entities to exclude unlicensed motorcycle use on their land.

The suitability and value of this trail for unlicensed dirt motorcycles is questionable, as Alternatives B, D and E propose to prohibit unlicensed OHV mixed use on the Marshall Pass Road 200. Alternative D, the only alternative in which PA 6 is proposed to be open to motorcycle use, also proposes to close Forest Road 200 to unlicensed motorcycle use. Under Alternative D, dirt motorcycles would only be legally allowed to ride ~ 6 miles of out and back routes consisting of Forest Roads 210, 204 and 204.A and new trail PA 6. This provides less than desired riding opportunities as the distance is minimal and no loops are available.

Segments of the existing PA 6 route are very steep, exceeding 40% grade. This exceeds all limits for the short pitch maximum for trail design parameters of any class of motorcycle trail. Such steep grades would be difficult to maintain and sustain.

### **Support conversion of the Colorado Trail Road 243.G to an administrative road**

This route is the Continental Divide National Scenic Trail and Colorado Trail for almost one half mile north of Marshall Pass.

This dead end route does not provide significant motorized recreational use opportunity. There is little evidence of dispersed motorized camping along this route. A good percentage of the motorized use of this route is by quiet recreationists using it to climb Mt. Ouray. We believe most of these users would rather extend their hike on a route with limited motorized use by parking near Marshall Pass and hiking.

Public motorized use of this route by ATVs, full sized 4WD vehicles and motorcycles substantially interferes with the nature and purpose of the CDNST as a primitive hiking and horse riding route. As a narrow road encounters between trail users and motorized vehicles demand attention, and can result in conflict.

Support proposed actions in alternatives D and E to turn this route into an administrative road that limits public motor vehicle use

#### **Support closing the Pass Creek Trail 1411 to motorcycle use**

Alternative E proposes to close this trail to motorcycle use.

This trail provide marginal opportunities for motorcycle riding. The distance from the start of BLM road 212 (where an unlicensed trail bike could begin riding) to the end of this trail is ~6.5 miles. A 13 mile out and back ride provides minimal saddle time.

This is a very rough trail passable only to expert riders. Many motorcycle riders cannot ride up the first major steep and rocky hill in the trail, and turn around after covering only one half mile of trail. Fewer riders can ascend the final steep and rocky hill to the end of the trail at the lake. The Forest Service has installed a sign next to the trail before this steep and rocky section

#### **Close the end segment of Forest Road 212 within the Chipeta Roadless Area**

#### **Support administrative use only road (Alt B) or Decommission (Alt D and E) for Stumpy Creek 214.E**

#### **Support conversion of 298.A Williams pass to non-motorized trail**

Alternative C and E.

Wetland and riparian area impacts. Route passes through a fen.

Route only open one month of the year if conditions warrant. Route has not been opened for last 3 years. Route connects to closed route on Gunnison National Forest.

Extremely muddy conditions are often present on the route.

#### **Support eliminating mixed OHV use from a .86 mile segment of the Aspen Ridge Road 185 and from road 185.A Linholm Ranch Road**

This is proposed in alternatives B, C, D and E.

Will help with the management of unlicensed OHV use by separating OHV availability and use into separate areas of the Forest.

The segment of road 185 is narrow and has limited sight distances due to steep rolling hills. OHV operators are tempted to travel at high speeds in this section, due to the straight alignment and relative smoothness of the road surface. These factors combine to increase the crash probability on this road.

This segment of Forest Road 185 passes through CPW identified bighorn sheep and elk production areas. Prohibiting OHV use on this route will limit the amount of noise and the volume of recreational motorized use on this route, which will limit disturbance and displacement of wildlife in this area.