

**Decision Notice  
and  
Finding Of No Significant Impact (FONSI)**

**for the**

**RAMPART RANGE RECREATION AREA  
MOTORIZED ROADS AND TRAILS PLAN  
Douglas County, Colorado**

**USDA Forest Service  
South Platte Ranger District  
Pike and San Isabel National Forests**

**BACKGROUND**

The U.S. Forest Service (Forest Service), Pike National Forest (Forest), South Platte Ranger District manages the 91,000-acre planning area, referred to as the Rampart Range Motorized Recreation Area (RRMRA) (Recreation Area). The project area is located in Douglas County, approximately 15 miles southwest of the City of Denver. In 2004, a roads and trails assessment was initiated on the Rampart Range Motorized Recreation Area. The assessment began with an inventory of roads and trails in the project area. The trail system was assessed for consistency with current policies, recreational experience, maintenance, safety and environmental considerations. A roads analysis was completed to assess the current and desired future condition of the road system. Each road and trail was evaluated to determine whether it should remain, be modified, or be removed from the designated Forest Service travel system. A roads analysis report was completed in coordination with this EA (appendix-C). I have reviewed the roads analysis report and considered its recommendations in reaching my decision in this EA.

The purpose of considering changes to the road and trail system is to improve the safety, maintenance and recreational experience of the system within the Rampart Range Motorized Recreation Area. Historically, many motorized trails were developed solely and independently by users without considering environmental impacts, safety or the quality of the recreation experience. Consequently, many of these trails do not meet current trail design standards. Erosion from improperly located, designed, and constructed trails can cause environmental impacts, decrease safety, provide for a poor recreation experience and increase maintenance costs. Designating specific uses, realigning, adding, and decommissioning certain trails would address many of these concerns.

Based on this evaluation and public input, alternatives were defined to improve the road and trail system within the project area. The Forest Service then developed a proposed action based on conducted evaluations, input and the project purpose and need. The Forest Service prepared an Environmental Assessment (EA) for the Rampart Range

Recreation Area Motorized Roads and Trails Plan that was released for public review on July 21<sup>st</sup>, 2005.

The EA addresses approximately 100 miles of classified roads, 120 miles of motorized trails and unclassified roads and trails in the project area. The EA describes the proposed action and the potential environmental effects. The EA also describes the alternatives to the proposed action and the effects those alternatives may have on the environment.

**DECISION**

It is my decision to implement Alternative C (proposed action in the EA) with some changes to the road and trail recommendations. I selected Alternative C, because it reflects the environmental analysis, written public comment and comments received during four public workshops. This decision applies only to those roads and trails that are located on the Pike National Forest, on the South Platte Ranger District and within the Rampart Range Motorized Recreation Area. This decision was made following thorough review of the EA and the PSICC Forest Plan, supporting materials referenced by the EA, and reviewing comments from the public (see Appendix A: Response to Comments).

The features of this decision are as follows:

**A. Road System**

The current motorized road and trail management direction would continue to guide management of the project area. Sixteen miles of Maintenance Level (ML) 1 roads would be decommissioned. The remaining approximately 92 miles of ML 2, 3 and 4 roads would remain open. No realignments of any roads are planned except for a 1000 foot road realignment of Rampart Range Road where it intersects Highway 67 in order to improve intersection safety. Roads closed year-round, decommission or converted to other uses include Roads 502 (portions of road), 505, 509, 510, 511, 512, 514, 517, 562, 503, 507A, 512A, 512B, 514, 514A, 514B, 563A. All non-system and unclassified roads on Forest Services Lands within the project area would be decommissioned.

Resulting Road System	
Road Maintenance Level	Miles
Maintenance Level 2 Roads	22
Maintenance Level 3 Roads	42
Maintenance Level 4 Roads	28
<b>Total Roads (Excludes Level 1 Roads)</b>	<b>92</b>
Maintenance Level 1/ Re-vegetated Roads	16

**B. Trail System**

As shown the attached map, the approximately 149 mile trail system would be managed to provide a broad spectrum of OHV opportunities while

Resulting Trail System	
Trail Classification	Miles
Existing Full Size Vehicle, ATV and Single Track Trail	11
Existing ATV Trail (allows single track use)	48
Existing Single Track	8
New Full Size Vehicle, ATV and Single Track Trail	7
New ATV Trail (includes realignments)	34
New Single Track Trail (includes realignments)	41
<b>Total Trails</b>	<b>149</b>
Closed Trail	45

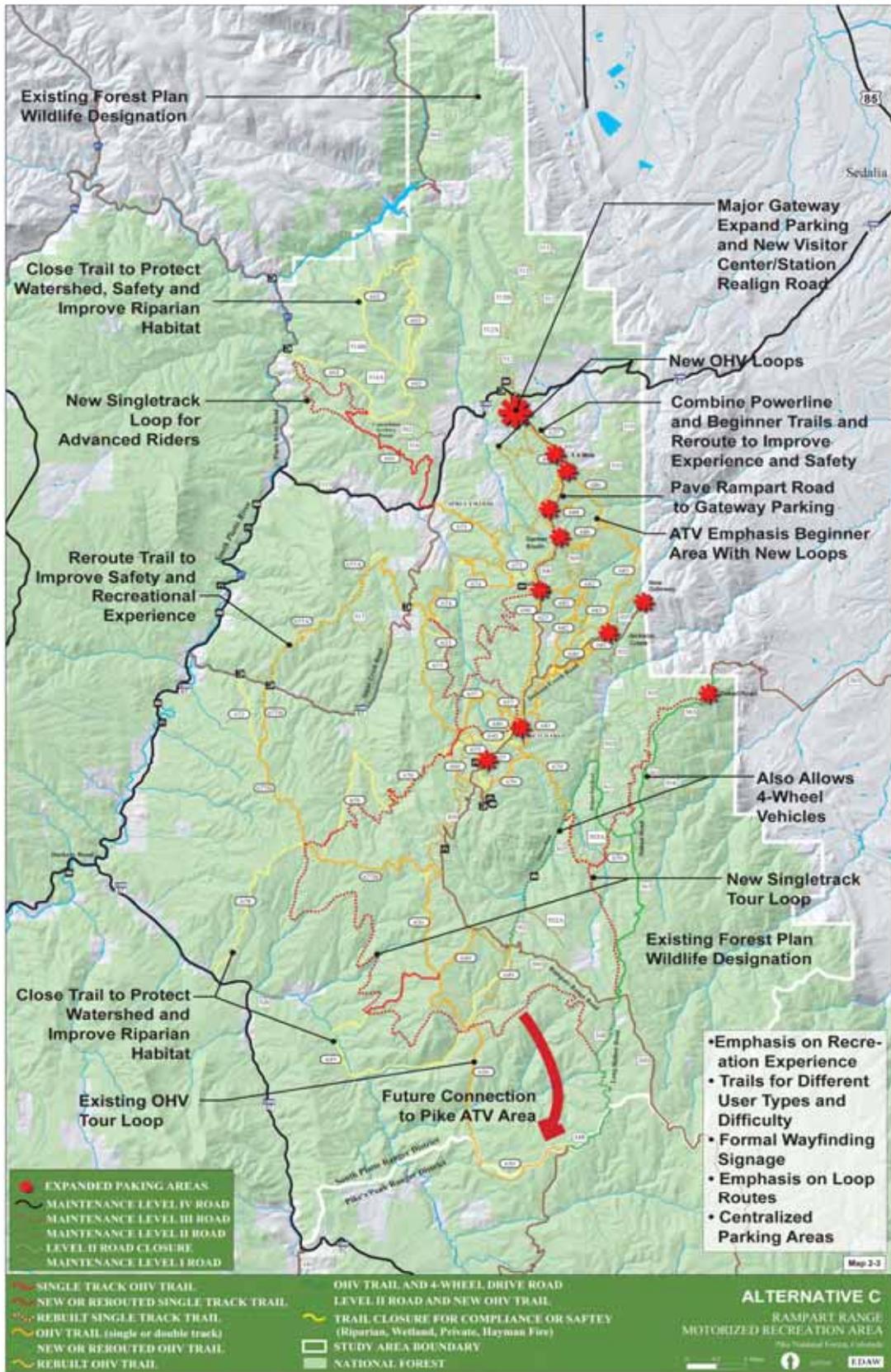
also enhancing resource protection, operational efficiency, and safety. The functionality of the system and experience of trail users, would be improved by developing looped trails, rerouting non-compliant trails, providing longer trails, creating new trail connections, and providing trails designed for each user type and skill level. Approximately 75 miles of rerouted and new trails would be constructed. New trails would be constructed for specific user types including single track, ATV and technical riders. Approximately 7 miles of road would also be reopened to OHV use. Approximately 45 miles of trails inconsistent with USFS policies (safety, environmental impacts etc.) would be closed. Closures include a short segment of motorized trail leading from Indian Creek Campground/Highway 67 to the parking lot located at the Rampart Range Road and Highway 67 intersection. All non-designated trails will be closed and restored.

**C. Facility Improvements**

Wayfinding on the trail system would be improved through new signage and strategically placed kiosks that designate trails by difficulty and use. This signage would be complimented by parking area improvements, including the expansion of parking areas and enhancements such as a visitor station, new restrooms, dumpsters, and other facilities focused at improving visitor experience, managing increasing number of users and public education about trail use.

Resulting Facility Improvements									
FACILITIES	ENTRANCE ROAD	MILE POINT 1.5	GARBER	SUNSET POINT	FLATROCK	DAKAN	JACKSON CREEK	DUTCH FRED	CABIN RIDGE
Kiosk	•	×	×	•	×	×	×	NA	•
Vault Toilet (CXT - Single)	•	•	×			×	×	NA	
Vault Toilet (CXT - 2 Hole)	×	×		•	•			NA	•
Lighting	×							NA	
Ramps	•	•	×	•	×	×	×	NA	×
Dumpster	•	•	×	•	•	×	×	NA	×
Fence	×	×	×	×	×	×	×	NA	×
Barriers/Bollards	•	×	×	×	•	×	×	NA	×
Access Gates	•	•	×	•	•	×	•	NA	•
Fee Tube	•	×	×	×	×	×	×	NA	×
Pay Phone	•					×	×	NA	
Signage	×	×	×	×	×	×	×	NA	×
Asphalt Pavement	×	×	×	×	×	×	×	NA	×
Electrical Utility	×							NA	
Potable Water	×							NA	
Trails Access	•	•	×	•	•	×		NA	•
Picnic Area	×	×	×	×	×	×	×	NA	×
Visitor Information Center	×							NA	
Access Improvements	■					■	■	NA	■
Parking Expansion (s.f.)	80,000	5,000	4,800	15,000	16,000	6,000	7,000	NA	5,000

**Key**  
 • Existing Element, × Proposed Element, ■ Existing Element that needs additional expansion



## REASON FOR THE DECISION

In making this decision, I considered the need:

- for a framework to manage road and roads;
- to reduce the proliferation of user-created roads and trails;
- to provide trails for a variety of user types and skills;
- to eliminate or reconstruct poorly designed and located roads and trails;
- to identify a travel system that can be efficiently maintained;
- to ensure adherence to the Forest Plan and other State and Federal Policies;
- to manage the increasing number of users;
- to address increasing traffic volume on trails and roads; and
- to improve education of users.

I also considered issues raised through public involvement, which included comments from the general public, environmental groups, off-highway vehicle groups, state and local governments, tribes, and consultation with regulatory agencies. CDOT and Douglas County Public Works identified key issues and recommended an approximately 1000 foot road realignment of Rampart Range Road to improve the intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service lands. We will cooperatively address this safety issue and incorporate it into this effort. The incorporation of a trail closure of the short segment of motorized trail leading from Indian Creek Campground/Highway 67 area to the parking lot located at the Rampart Range Road and Highway 67 intersection will improve safety by discouraging access to and from Highway 67 by unlicensed vehicles

Based on this change, the modified Alternative C does the best job of balancing recreation and environmental protection concerns while meeting the purpose and need of this project, which is to improve the safety, maintenance and recreational experience of the designated motorized road and trail system (EA, Chapter 1, page 1-4). The modified alternative will help achieve Forest Plan goals to provide a broad spectrum of recreation opportunities; maintain or improve water quality to meet Federal and State standards; protect riparian areas and wetlands from degradation; and manage the transportation system.

Many of the actions in this decision were derived from the Roads Analysis Report, which provides recommendations for a road system that is safe, responsive to public and agency needs, is environmentally sound, and is efficient to manage. In my determination, the approved action will maintain an efficient flow of motorized recreation routes throughout the area, thus providing safe and adequate public access to National Forest System lands while addressing resource concerns (EA, Chapter 3).

The numerous land management requirements including Forest Plan standards and guidelines, regulations, Best Management Practices, additional mitigation measures, and adaptive management techniques will ensure protection of soils, watershed conditions,

and wildlife habitat during construction, reconstruction, maintenance or decommission activities (EA, Chapter 2, page 2-11).

## **OTHER ALTERNATIVES CONSIDERED**

The Forest Service developed three alternatives to cover the broad range of issues, (the No Action, the Proposed Action, and one alternative to the Proposed Action). Other alternatives were also considered but eliminated from further consideration because they did not meet the purpose and need of this project. These are discussed in Chapter 2 of the EA (page 2-14). Alternatives considered in detail include the following:

- Alternative A is based on the continuation of existing management practices. The current road and trail closures would remain in place, with no planned construction, reconstruction or decommissioning of additional roads and trails. Resource and recreation needs would not be sufficiently addressed under this alternative.
- Alternative B focuses on enhancing access for motorized user groups. Motorized trails, existing, reconstructed and new, would be open to all users. Key trails would be closed or relocated to avoid direct impacts to natural resources. Resource and recreation needs would not be completely achieved under this alternative.
- Alternative C, the Proposed Action, , the road and trail system would be managed to provide a broad spectrum of OHV opportunities while also enhancing resource protection, operational efficiency, and safety. The functionality of the system and experience of trail users, would be improved by developing looped trails, rerouting non-compliant trails, providing longer trails, creating new trail connections, and providing trails designed for each user type and skill level. Alternative C as modified represents a balance of recreation needs and natural resource concerns and meets the purpose and need of this project.

## **PUBLIC INVOLVEMENT**

Project initiation letters were sent to tribal governments and Certified Local County Governments to solicit input and associated information. Scoping for the current proposal was initiated with notification in local newspapers, notification on the project website and a mailing to over 300 persons either known to be interested in similar projects or who had asked to be informed of such projects or of the proposed project. Over 300 people attended two open houses that were held in July of 2004. The majority of the comments received focused on enhancing the existing trail system and protecting environmental resources. Based on comments received and internal ID team workshops, three road and trail concepts were developed.

An additional mailing, notifications in local newspapers, and postings on the Pike National Forest website were used to advertise two additional public workshops held in Denver and Douglas County in October of 2004. The purpose of these workshops was to discuss and refine concepts for enhancing the road and trails system. Approximately 120 people attended the workshops and comments were received following the meetings. Comments on these Planning Concepts were subsequently incorporated, as appropriate, into the three draft alternatives. The majority of the comments received supported a road and trail concept that created trails for different user types, provided for more trail loops and enhanced resource protection (Alternative C). Based on comments received and subsequent internal Forest Service team workshops, the three project alternatives presented in Chapter 2 were developed, made available in hardcopy and posted on the website. The draft Alternatives were made available for public review and comment on November 23, 2004.

At the request of the public, the U.S. Forest Service extended the comment period until March 22, 2005 to provide additional opportunity for citizens to give comment on draft Alternatives. The extension of the comment period resulted from a desire to ensure all interested segments of the public had a fair opportunity to review the project and the associated draft Alternatives, and to provide input. Additional comments were considered and the Alternatives refined. Based on the final Alternatives, the Environmental Assessment, Biological Assessment, Biological Evaluation and Roads Analysis were completed. On July 19th, the Forest Service announced, by e-mail as well as through the news media and two community web sites, the availability of the Environmental Assessment for public review and comment. The notice included a copy of the news release that referenced the July 21 beginning of a 30-day comment period, which ended on August 22, 2005. The full EA was posted on the Internet and was available for distribution at the District office. The Forest Service received over 100 public comment letters on the EA.

### **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

Based on the interdisciplinary environmental analysis, review of the National Environmental Policy Act (NEPA) criteria for significant effects, and my knowledge of the expected impacts, I have determined that this action does not pose a significant effect upon the quality of the human environment. Therefore, an Environmental Impact Statement will not be prepared. This determination is based on the following factors:

#### **A. Context**

This project is local and would affect approximately 20 percent of the classified road system and 40 percent of the designated trail system on the Rampart Range Motorized Recreation Area. These Forest Service lands account for approximately 8% of the total 1.1 million acres of the Pike National Forest. Project duration is expected to be 5 to 10 years, depending on funding. Although the project has regional and some national interest, the people most affected by the project would be primarily local residents and

recreationists from the Front Range of Colorado.

## **B. Intensity**

### **Environmental Effects**

I find that Alternative C as modified can be carried out without any significant effects on social, economic, cultural, and natural resources as documented by the EA. Overall, this project will have a long-term beneficial impact on the environment (See EA chapter 3).

The rehabilitation and relocation of roads and trails, especially along stream corridors, (EA, pgs. 3-1, 3-10, 3-14), will help reduce erosion and stream sediment loading and will result in a long-term beneficial impact to water quality, riparian areas, downstream fisheries and aquatic habitat. Implementing the specific mitigations listed in Chapter 2 of the EA (pg. 2-11) will help minimize the risk of sediment entering streams.

Road and trail actions would reduce the overall foot-print of activity in the project area and create three large areas of non-motorized habitat. Trail closures and re-routes would provide improvements to some of the most sensitive habitats (aquatic and riparian) in the project area. The result will be a beneficial impact on wildlife (EA, pgs. 3-28 to 3-35). Road and trail realignment, construction and decommission activities could cause minor, mostly short-term impacts if sensitive wildlife species or habitats are present. Mitigation measures for wildlife presented in the EA and Forest Plan direction will minimize any adverse impacts (EA, pg. 2-11). The overall increase in trails could accelerate the dispersion of noxious weeds. To reduce weeds in the project area, educational information will be presented to the public at the contact station and parking areas that informs users on ways to reduce and manage weeds in the area.

The Proposed Action would create larger areas with reduced noise levels by closing several trails, and condensing the overall trail system into a smaller area where several trails currently exist. However, some conflicts may still occur between private in-holdings and motorized trails use (EA, pgs. 3-56 and 3-59).

Trail activities, closure, reconstruction and new trails would result in an improvement of recreation opportunities and user satisfaction (EA, pg. 3-48). A formalized travel system would be put into place that consists of clearly designated roads and trails (EA, pg. 3-59). To achieve the desired result, an increase in funding would be needed for trail construction: however, per unit maintenance costs should decrease as trails are improved. Local businesses could see a slight increase in expenditures as the system is improved (EA, pg. 3-68).

## **Public Health or Safety**

This action does not pose a substantial question or significant effect upon public health or safety. It would, however, have some benefits to public safety by providing a formalized travel system consisting of clearly designated roads and trails. Poorly sited trails, located on steep slopes, leading to dead-ends and connecting to roads in which unlicensed vehicles are prohibited would also be removed, creating safer conditions for users. Other improvements will include modifications to the intersection of Rampart Range Road and Highway 67.

## **Unique Characteristics of the Area**

There are no unique characteristics of the geographical area that will be significantly affected by the proposed actions. Historic or cultural resources will not be affected because sites will be avoided and mitigation measures (EA, see Chapter 2) will be implemented to ensure that any eligible or potentially eligible heritage sites are not disturbed. The selected alternative will not adversely affect the finding of eligibility and will maintain the classifications identified in the South Platte Wild and Scenic River Study (EA, pg. 3-1).

## **Controversy**

I recognize there is some level of public controversy associated with the management of roads and trails. The project benefits both the recreational users and the natural environment. Overall, after reviewing the public workshop summaries and the EA comments, the majority have been in support of the Proposed Action. Not all of the comments received were in full support of this project. After reviewing the public comment responses and the EA, I am confident the Interdisciplinary Team reviewed these comments and incorporated them into alternatives where possible or addressed them in the appropriate resource section. It is my judgment that there does not exist an unusual or high degree of controversy related to this project. Indeed, there is a strong level of community support.

## **Uncertainty**

There are no known effects on the human environment that are highly uncertain or involve unique or unknown risks. All of the effects of the selected alternative are similar to those taken into consideration in the Forest Plan. Best Management Practices, mitigation measures and adaptive management techniques will ensure effects are within expected parameters (EA, Chapter 2).

## **Precedent**

The selected alternative does not represent a precedent for future actions with significant effects or represent a decision in principle about a future consideration. The assessment is site-specific and its actions incorporate those practices envisioned in the PSICC Forest

Plan and are within the Standards and Guidelines included in the Forest Plan. Future projects not addressed in the EA would have to be evaluated separately under NEPA.

### **Cumulative Impact**

There are no known significant cumulative effects between this project and other projects implemented or planned in the area. The EA describes the anticipated cumulative effects (EA, Chapter 4). However, I am satisfied, after reviewing the EA, that none of the cumulative effects of the decisions are significant. Furthermore, the cumulative long-term effects of removing trails in sensitive areas, burn restoration activities and other projects would be beneficial.

### **Properties On or Eligible for the National Register of Historic Places; Significant Scientific, Cultural, or Historical Resources**

There are no known cultural resources that would be significantly affected by this project. Prior to constructing, rerouting or decommissioning a road or trail, an archaeological survey will be conducted to identify historic and prehistoric sites and evaluate them according to the National Historic Preservation Act. If cultural resources are found during operations, work will be stopped, Forest Service archaeologists consulted, and appropriate mitigation implemented.

### **Endangered or Threatened Species**

I find the action will not jeopardize the continued existence of any federally listed or proposed endangered or threatened species or adversely modify critical habitat. The Biological Assessment (BA) supports this conclusion (the project record contains the BA). Therefore, I find that the action can be carried out with no significant adverse effect to federally listed species.

### **Legal Requirements for Environmental Protection**

Implementation of the selected alternative will not violate any Federal, State, or local law or requirements imposed for the protection of the environment. Applicable laws and regulations were considered in the EA (EA, Chapter 1). This project is fully consistent with the PSICC Forest Plan and will comply with Best Management Practices and mitigation measures. In arriving at this conclusion, I have considered the potential effects in terms of Context and Intensity as described in 40 CFR 1508.27.

### **Findings Required by Other Laws and Regulations**

This project was designed in conformance with the PSICC Forest Plan standards and guidelines. As such, my decision to proceed with the modified Proposed Action is consistent with the Forest Plan and the National Forest Management Act.

## **ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES**

### **A. Appeal Standing**

Pursuant to 36 CFR 215.5, the public was invited to review and comment on the EA for a 30-day period. Individuals or organizations that submitted “substantive” written or oral comments during the 30-day comment period established “standing” to appeal this final decision. The 30-day comment period began July 21, 2005 and ended August 22, 2005. Over 100 letters and/or emails were received during the 30-day comment period. Individuals and organizations that provided substantive comments are eligible to appeal.

### **B. Appeals Information**

This decision is subject to administrative review pursuant to Federal Regulations at 36 CFR 215.11. Appeals (including attachments) must be in writing and filed (regular mail, fax, e-mail, hand-delivery, express delivery, or messenger service) with the Appeal Deciding Officer (36 CFR 215.8) within 45 days following the date of publication of this notice. The publication date of the legal notice in the newspaper of record is the exclusive means for calculating the time to file an appeal (36 CFR 215.15(a)). Those wishing to appeal should not rely upon dates or timeframe information provided by any other source.

Pursuant to 36 CFR 215.13(b), only those individuals and organizations who submitted substantive comments during the 30-day comment period may file an appeal. Where to file an appeal:

USPS: Appeals Deciding Officer  
USDA, Forest Service  
Rocky Mountain Region  
POB 25127  
Lakewood, Colorado 80225-25127

UPS, FED EX: Appeals Deciding Officer  
USDA, Forest Service  
Rocky Mountain Region  
740 Simms  
Golden, Colorado 80401  
303 275-5296  
Fax: 303-275-5134  
E-mail: [appeals-rocky-mountain-regional-office@fs.fed.us](mailto:appeals-rocky-mountain-regional-office@fs.fed.us)

### **C. Appeal Content Requirements:**

It is an appellant’s responsibility to provide sufficient activity-specific evidence and rationale, focusing on the decision, to show why the Responsible Official’s decision should be reversed. At a minimum, an appeal must include the following (36 CFR 215.14):

1. Appellant's name and address (36 CFR 215.1), with telephone number, if available;
2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
3. When multiple names are listed on an appeal, identification of the lead appellant (36 CFR 215.2) and verification of the identity of the lead appellant upon request;
4. The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
5. The regulation under which the appeal is being filed, when there is an option to appeal under either this part or part 251, subpart C (36 CFR 215.11(d));
6. Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
7. Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
8. Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
9. How the appellant believes the decision specifically violates law, regulation, or policy. Notices of Appeal that do not meet the requirements of 36 CFR 215.14 will be dismissed.

The appellant is responsible for submitting an appeal on or before the last day of the appeal filing period. Where there is a question about timeliness, the U.S. Postal Service postmark on a mailed appeal or the time and date imprint on a facsimile appeal will be used to determine timeliness. Pursuant to 36 CFR 215.9(a), if no appeal is filed, implementation of this decision may occur on, but not before, the fifth day from the close of the appeal filing period.

#### **D. Contact**

For additional information concerning this decision or the Forest Service appeal process, contact Randy Hickenbottom, District Ranger, South Platte Ranger District, at 303-275-5610.

**Signature and Date**

/s/ Randy Hickenbottom \_\_\_\_\_

October 18th, 2005

Date

Randy Hickenbottom, District Ranger  
South Platte Ranger District  
Responsible Official

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# APPENDIX A

## Response to Comments

### Decision Notice and Finding Of No Significant Impact (FONSI)

#### RAMPART RANGE RECREATION AREA MOTORIZED ROADS AND TRAILS PLAN

#### INTRODUCTION

The Forest Service received over 100 public comment letters/emails on the Environmental Assessment (EA). These comments have been documented, analyzed for content, and responses have been prepared. This section presents all of the substantive comments received on the EA and the agency's response to those comments. Comments that simply favor or oppose specific alternatives or those that only agree or disagree with Agency policies were not considered substantive comments. Comments were grouped by key topics and subjects and comment excerpts in **boldface** are used to briefly describe the main points that are made in the comment letters. The comments are not presented here in their entirety; they are available for public review in the Project Record. Comment numbers in parenthesis following the boldface comment excerpts refer to the numbering system used in the content analysis process and can be found in the following Appendix B and the Project Record.

#### OHV

(1)...Public lands should not be open to activities that inherently scar those lands. This OHV activity is dangerous and destructive.

*Response: Proposed activities are consistent with the PSICC Forest Plan (EA, page 1-5). Please see additional discussion below.*

(29) I am violently opposed to the use of our national forest land for motorized "recreation". This activity is harmful to the environment and significantly degrades the recreational experience for all other users whose activities do not create air and noise pollution....If it must be allowed, the numbers should be severely restricted, there should be a high user fee to reflect the damage done and to provide for reclamation and enhancing trails/facilities for nearby non-motorized uses and finally allow it in only the most remote locations that are most likely not conflict with areas popular with non-motorized users.

*Response: As stated in the EA (EA, page 3-55), the Proposed Action is consistent with the Forest Plan which permits motorized recreation activities within designated management areas. Under this alternative, trails are increased primarily in Management Area 2A, which has an ROS class of Semi-Primitive Motorized and has a management emphasis directed at providing motorized recreation opportunities. A large amount of trail remains present in Management Area 2B which has an ROS class of Roaded Natural. Trails were reduced in Management Area 4B and 9A in which the*

*management emphasis is this area is to protect habitat. No trails are present or were added to area Management Area 3A which has an ROS class of semi-primitive non-motorized. Motorized trails were removed from several key locations frequented by non-motorized users. These locations include areas; north of Highway 67, near the South Platte River , 4B Management Areas and near the Colorado Trail.*

(61)...We are concerned about the multitude of “illegal” trails that criss-cross the hillsides near us. How are you going to enforce OHV’s staying on designated trails?

*Response: Though beyond the scope of the EA, the USFS has dedicated personnel focused on enforcing regulations relating to the motorized trail system. Overall enforcement is determined at the Forest level and is directed to areas that need it (outside the scope of this EA). All informal, non-designated trails will be closed as part of the Plan. The Plan stresses a formalized, designated trail system. The design of the trail system will encourage the use of a formalized trail system and education of trail users by providing information at kiosks and new signage. The overall trail system, focused on loops, will also improve enforcement.*

(82) The plan seems to fail to address the growth of the OHV community, which is documented by the 10% annual growth in registrations per year. The trail mileage is about the same it was in the late 1970’s, in spite of enormous population growth and increased dirt bike penetration among that population as well as the creation of a totally new class of OHV (ATVs) which now exceeds dirt bikes in numbers and growth. Adding 20 miles of new trails is a step, albeit a small one, in the right direction. Reducing the area available for OHV use, by not even considering reopening Top of the World Trail and it’s surrounding area, then closing the Bear Creek area and the Trout Creek area simply aggravate and intensify all OHV related problems by cramming OHV users into denser and denser areas. Please reconsider these actions and reverse this trend.

*Response: The Proposed Action was developed through 4 public workshops, consideration of public comments, meetings with the USFS ID Team, agency meetings, environmental analyses, and reviewing guiding documents such as the Forest Plan. The plan does not preclude modifications to this document or other actions in the future that may increase or decrease the motorized trail system. A number of the trails mentioned are outside the scope of this EA.*

(90) It still seems to me that any new trails for motorized traffic is directly in conflict with what the Upper South Platte recovery plan has stated, that many roads and trails would be closed to protect the environment.

*Response: Key designated motorized trails as well as informal trails in close proximity and connecting to the South Platte River as well as trails directly in or along streams and riparian areas were closed, therefore supporting the objectives of the Upper South Platte Recovery Plan. No new roads were added as part of this Plan and ML-1 roads were closed.*

*New trails will be designed according to the Forest Service Trails Management Handbook in order to minimize the potential for erosion and subsequent sediment production. New trails will be designed to limit the extent and intensity of potential future impacts. The closure of highly erosive trails and the opening of new trails will have a positive effect on the cumulative impacts in the South Platte Watershed. Opening new trails that are constructed on a shallow grade and maintained to USFS trail standards will have no significant effect on sediment production. Closed trails will be rehabilitated with erosion control devices and native vegetation.*

(91) We also remain convinced that continuing usage of the current trails situated North of Highway 67 is not necessary and will cause much erosion of the soils in this area due to the nature of the terrain and soil. We continue to be convinced that relocating OHV trails in this area to the South of Highway 67 also has the advantage of reducing the total area of the Motorized area, simplifying National Forest Service management and maintenance, at no expense in trail mileage to the OHV community.

*Response: A large amount of motorized trail was removed from areas north of Highway 67 as shown in Alternative C due to the presence of prime wildlife habitat, erosion considerations, proximity to non-motorized trail uses, and severe slope. Erosion cannot be used as the only criteria since proper trail design will mitigate erosion risks. Additions to the trail system will be built to minimize erosion.*

(95) We believe the park should be limited to walking, hiking and camping and access by automobile on designated roads and parking areas as regulated by the Pike National Forest.

*Response: The RRMRA has been expressly designated by the USFS for the purpose of motorized recreation, just as Wilderness Areas have been designated for non-motorized uses. Motorized uses are consistent with Forest Plan direction.*

(98) Will motor vehicles be allowed to go through Trout Creek? If so, what impact will it have on the environment and our down stream community?

*Response: Alternatives B and C permanently close and rehabilitate the section of trail that leads to and crosses Trout Creek. The Forest Plan also does not prohibit vehicles from crossing streams. The Colorado Department of Public Health, as well as the federal Environmental Protection Agency, have mechanisms to identify impaired waters and require that the water quality be improved. Trout Creek is subject to the state antidegradation policy. This policy ensures that designated beneficial uses are maintained and protected.*

*“For all state waters, existing classified uses and the level of water quality necessary to protect such uses shall be maintained and protected. No further water quality degradation is allowable which would interfere with or become injurious to these uses. The classified uses shall be deemed protected if the narrative and numerical standards are not exceeded.”*

(CDPHE, Regulation 31- Basic Standards and Methodologies for Surface Water).

*The Forest Plan states that all streams are subject to the standards of the State of Colorado Water Quality Control Act of 1973 and the 1983 and 1985 goals of the Federal Clean Water Act (CWA) of 1977.*

*“All activities occurring on the Forest must be mitigated if necessary in order to meet state water quality standards as well as threshold sediment levels.” PSICC Forest Plan*

*“Forest management activities in any wetland, riparian area, and flood plain, will be designed to prevent long and short-term adverse impacts, in accordance with Executive Orders 11988 and 11990, the direction outlined in Forest Service Manual, sections 2526, 2527, and 2633, and in Management Prescription 9A.” PSICC Forest Plan*

*Executive Order 11990 states, “all federal agencies shall provide leadership and take action to minimize the destruction, loss or degradation of wetlands.”*

*The Forest Service will abide by the aforementioned laws and policies when implementing this decision. With the closure of trails crossing Trout Creek the impacts from such trail crossings will be eliminated.*

### **Trails and Trail System Design**

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 31, 33, 34, 35, 36, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Do not close trails identified to be closed until new trail sections in the same vicinity have been opened. This will avoid angering OHV enthusiasts.

*Response: Trails identified for closure would need to be closed under Alternatives A, B and C (current policy) due to the presence of resource damage. These decisions would be made based on resource damage irrespective of the status of new trails projects. Trail construction/reconstruction will begin in 2005 and continue annually and completed as allowed by available funding*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Re-route #678, This will disperse OHV traffic and re-open a portal to the system that is needed in this area because licensed vehicles used this trail to access the trails in the Westcreek area to create long trail loops.

*Response: Trail 678 has significant natural resource issues and therefore should remain closed. Reasons for this include the need for non-fragmented contiguous habitat, its location in a drainage area, severe erosion, and other considerations including being partially located within the Hayman burn area. In addition, this trail does not meet the purpose and need of having loop trails. This trail accesses Highway 67, which causes safety issues and provides access to a class of road that does permit unlicensed vehicles.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Increase the mileage of the proposed new single-track trail #693, advanced riders will be able complete this trail quickly and will be looking for more single-track trail to ride.

*Response: The proposed single-track route is based on input provided during four public meetings and a resource evaluation. Constraints to extending the trail include private development, road crossings, sensitive wildlife areas and areas in close proximity to the South Platte. The redesigned trail will be designed with the expert rider in mind.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Build a single-track connector trail suitable for motorcycles on the North side of Highway 67 from near the intersection of Rampart Range Road and Highway 67 (old dump road) West to trail #692, (the Bear Creek Trail). This trail is needed to allow advanced riders access to trail #693, which will be the most difficult trail in the proposed system, from the parking areas along Rampart Range Road and to provide more miles of difficult trail for these advanced riders and more loop opportunities.

*Response: The area is constrained by private parcels, non-motorized trails, equestrian use, severe slopes, proximity to 4b Management Area, sensitive wildlife areas and stream crossings.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Do not close the south end of trail #690 and #627, combine these trails and reroute new trail to follow land contours. The south end of these trails are needed to access Cabin Ridge, Devils Head and the south end of trail #679 and to complete other loops in the south end the trail system.

*Response: A route will remain. The Proposed Action is consistent with the comment.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Build a connector trail suitable for motorcycles and ATVs from the new parking area on the north end of Jackson Creek Road northwest a short distance to trail #685. This connector trail would allow a more direct access into the northern part of the trail system, disperse traffic and would help keep OHV's off of Jackson Creek Road when they are in a hurry to return to their vehicles left in this parking area.

*Response: The proposed action does call for a trail to connect this parking area to trail # 685.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Build a single-track connector trail suitable for motorcycles from the parking area on Dakan Road to the parking area on Jackson Creek Road or trail #685 or trail #681. This

connector is needed to complete the single-track loop trail and to provide access to the north end of the trail system from the Dakan road parking area.

*Response: This connection is not feasible. Constraints prohibiting the trail include private property, sensitive wildlife areas, Jackson Creek and topography.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Build a connector trail from the north end of trail #673 near the Sprucewood to the northern most part of trail #674. This connector would help to disperse the heavy traffic on trail #673 and enable easier access to southern trails.

*Response: A connection is already provided. Any additional trails would conflict with private property owners.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Leave the east end of trail #673 open, this trail helps to disperse the heavy traffic in the area and is part of a loop with 674 that younger riders enjoy riding and parents appreciate when their vehicles or camps are near by.

*Response: No plans to close 673 are planned. Additional trails in the area would conflict with natural resources and private property. Proposed new trails north will disperse use and provide other travel options.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Re-establish an old connector trail suitable for motorcycles from trail #653 southeast to the intersection of two new proposed single-track trails. This connector would allow trail #653 to be connected to the rest of the single-track trail system.

*Response: A rerouted 653 provides this connection.*

(6) There are no "great" loops to ride and it takes quite a bit of navigation to create any kind of loop.

*Response: The proposed action provides a series of new loops that avoid major resource constraints.*

(7) I would urge the concept of separate areas/trails for separate type users, while supporting and encouraging Multiple Use access and management. ...Please provide as much single track trail mileage as possible, this single track must be open to motorized users, not just non-motorized users. Or better yet, separate areas for motorized and non-motorized single track trails. Or even better, the non-motorized users have an excess of areas and trails that are not available to us motorized users, balance that over supply of

non-motorized areas by designating Rampart Range off limits to non-motorized access/use, and make it exclusively open to motorized users.

*Response: The Forest Plan permits uses by a variety of users. The Proposed Action also provides trails designed for different user types and skill levels, including single-track. The proposed action includes 41 miles of new single track trail.*

(8) One of the high points of riding Rampart is the variety of trails. Please keep this a priority. Yes, there needs to be challenging single track (motorcycle only) trails. ...I am also concerned by the following statement: Approximately 45 miles of trails inconsistent with USFS policies (safety, environmental impacts, etc.) would be closed. I didn't get any indication which trails are included in the 45 miles that would be closed. If this includes significant amounts of the challenging single track, I would be extremely opposed to that action. ...There is also the sentence that includes: ...experience of trail users, would be improved by developing looped trails. In general, if any organization tried to improve the experience I have at Rampart, I am almost sure it would have the opposite effect. Another attraction of Rampart, for me, is that has been a relatively hands off region of the National Forest.

*Response: The EA (EA , page 2-9, Map 2-3) illustrates each trail planned to be closed. Trails inconsistent with the Forest Plan objectives would be closed and restored. These include trails in which severe erosion is occurring, trails located in federally-listed species habitat and trails located directly in riparian and stream habitats. The total amount of trail is increased from approximately 120 miles to 149 miles in the proposed action, including new trails for single track and a new technical single track trail.*

(10) I'm for more single track at Rampart for motorcycles / shared use. Without more trail options it will become way overcrowded. We must make more single track available as we have more motorcyclists.

*Response: The total amount of trail is increased from approximately 120 miles to 149 miles in the proposed action, including new trails for single track (41 miles) and a new technical single track trail.*

(28) We also recommend that new trail sections are opened prior to closing those sections that have been identified for closure, in the same vicinity. This will avoid angering OHV enthusiasts who won't necessarily be aware that new sections are coming, and may be more prone to ride illegally, which is not in anyone's best interests.

*Response: Trails identified for closure would occur under Alternatives A, B and C (current policy) due to the presence of resource damage. These decisions would be made based on resource damage irrespective of the status of new trails projects. A key consideration of new trail construction will be to balance closures with new trail construction. New trail construction will begin in 2005 and continue annually and be focused on maintaining the system and vital connections.*

(33) Single-track motorcycle only trails need to be re-established and protected to prevent ATV use. The trail network needs to be expanded; the growing number of users is stressing the existing trail network. Please consider re-opening the "top-of the world loop" and other existing trails.

*Response: The total amount of trail is increased from approximately 120 miles to 149 miles in the proposed action, including new trails for single track (41 miles) and a new technical single track trail. Regional motorized trails located primarily outside of the planning area that were closed through other decision processes were not considered in this EA. These trails, including the "Top of the World" trail, are outside the project area and scope of this analysis.*

(44) Trail 678 -- Neither this trail nor any other trail should be closed due to the Hayman fire. If this trail, and/or old trail 693 (Russel Gulch), is being closed so as to eliminate an entrance to the trail system in this vicinity, for the purpose of concentrating all access to the system into one or a few areas, in order to facilitate the collection of fees which have not yet been approved by the users of this system, then the closure is unethical, wrong, and perhaps quite illegal.

*Response: Proposed trail closures are based on a number of considerations such as erosion, sensitive habitats, riparian areas, proximity to non-motorized use, private property considerations, dead-ends, poor access and trail condition. As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment.*

(47) I believe it is very important to have new trails ready to use before closing any old trails. The idea of paving part of Rampart Range Road makes no sense, just a waste of money and I don't believe any one want a visitors center, that would be another waste of money.

*Response: Trails identified for closure would occur under Alternatives A, B and C (current policy) due to the presence of resource damage. These decisions would be made based on resource damage irrespective of the status of new trails projects. The paving of Rampart Range Road is currently only likely in areas associated with the gateway parking area at the intersection of Rampart Range Road and Highway 67. A new visitor contact station is one of many components of the Proposed Action. Its implementation is contingent on funding and assessment of current needs at the time.*

(51) There is a lot of "what if's". There needs to be more answers telling us if the money is there or not as well as time lines on closing and opening new trails. If we close 17 miles of trails, how soon will the new 40 open??

*Response: Trail construction will be based on USFS funding, funding by non-profit groups, state grants, and volunteer activities. New trail construction is planned to start*

*in 2005. The USFS will construct new trails annually; the amount of new trail will depend on funding, staffing and trail construction difficulty. We will generally link new construction with trail closures and rehabilitation to the greatest extent practicable.*

(54) The only other comments I have are to look at making some loops one way and more single track.

*Response: The proposed action provides new loops and new single track trail. One way trails were debated but are not feasible. One way trail would be impracticable to enforce and increase the likelihood of high speed collisions. Riders are generally more aware and cautious on bidirectional routes.*

(2) I have a design for a single track gate entrance that will help all of us prohibit illegal abuse of single track trails by four wheeled ATV's...Please let me know if there is an opportunity to discuss the gate with you further.

*Response: As trails are constructed, design elements such as gates, trail location, signage and other tools will be used to limit use to key users types. We would consider new gate designs and would like to see your proposal.*

(58) Expand the system on the South of Hwy. 67 and make the trails on the North side available for non-motorized traffic only. This would increase the usage of the North side by hikers; bicyclist and horse back riders while increasing the usage for the bikers in a more manageable area. This would also make maintenance and safety issues easier and again more manageable.

*Response: As described in the Proposed Action and illustrated in Map 2-3, the motorized trail system is expanded south of Hwy 67. The remaining motorized trail on the north side of HWY 67 will be separate from the non-motorized trail system. Two motorized trails and four roads would be closed north of Highway 67. Sections of these trails are located in streams and riparian areas and, even as non-motorized trails, would not be consistent with Forest Service direction.*

(55) Table 3-3 shows more than 4 miles of new trail under Alternative B, but the text says less than 1 mile – which is correct?

*Response: As stated in the EA (EA, page 3-8), in Alternative B, new trail construction totaling less than 1 mile would occur in the Water Influence Zone (WIZ), this is consistent with Table 3-3.*

(55) Table 3-3 shows more than 5 miles of new trail under Alternative C, but the text says less than 3 miles – which is correct?

*Response: As stated in the EA (EA, page 3-9), in Alternative C, new trail construction totaling less than 3 miles would occur in the WIZ, this is consistent with Table 3-3.*

(55) What are the key areas where existing access needs to be maintained? Do existing trails that would be closed under Alternatives B and C provide some of this access?

*Response: Primary access is provided at the key parking areas identified (EA, Map 2-3). Trails connecting to these access points should be maintained. Other trails identified in the Alternative provide additional access to key areas.*

*Access considerations were evaluated by the ID team for each closed trail. Highway 67 access was historically provided by Trails 678, 672 and 678. No formal parking areas are provided on Highway 67 due to safety and unlicensed vehicles enforcement considerations. Closure of these trails due to resource considerations is still warranted.*

*Trail 693 provided access to the South Platte River at Highway 97. Closure would further protect this resource and address direct resource impacts. No formal parking areas are on Highway 97 due to safety and unlicensed vehicles enforcement considerations. Closure of this trail due to resource considerations is still warranted.*

(55) How many trails are “incompatible with Forest Service direction” under Alternative A? How many would remain incompatible under Alternatives B and C?

*Response: Incompatible trails are outlined on the Alternatives Maps in the EA on Maps 2-1, 2-2, 2-3, in yellow. However, additional trails may be identified in the future that require closing or reconstruction. Key trails incompatible with Forest Service direction in Alternative A include 678 and 649. Other trails that were identified in Alternatives B and C that have existing resource issues include all or portions of Trails 692, 693, 672, 650, 676 and 674. No trails that are incompatible with Forest Service direction will remain under any alternative.*

(61) “Motorized travel will only be permitted on designated roads and trails”. This has never happened in the past. How will this be enforced now?

*Response: Overall enforcement is determined at the Forest level and is directed to areas based on need (outside the scope of this EA). However, all informal, non-designated trails will be closed as part of the Plan. The Plan stresses a formalized trail system. The design of the trail system should encourage the use of a formalized trail system; education of trail users will also be emphasized by providing information at kiosks and new signage. The overall trail system, focused on loops, may improve enforcement.*

(61) Another concern is maintenance of the trails. Currently there are deep grooves where trails are located on slopes. I have seen several places where the groove is chest deep. This is caused by wearing away of the trail by OHV’s and then subsequent erosion. Where will the money come from to maintain the new trails and not let them get into this condition? And will the old trails be repaired so this will not continue to happen? Maintenance has not been performed in the past – how will it be done in the future?

*Response: The USFS Trails Management Handbook provides construction guidelines and corrective measures that will be considered when planning and constructing trails. All new motorized trail construction will be constructed based on established designed standards to avoid the situation you are indicating. Existing trails that have ongoing maintenance issues will be reconstructed/rehabilitated based on USFS standards.*

(62) - Since most ATV users just like riding on roads or playing in circles, I suggest that most of the new and existing trails be for dirt bikes only. I have noticed that most of the rogue trails are made by the ATV's, primarily because they don't like going through all the whoops, so they go around.

*Response: Alternative C will create designated Single Track trails. The Plan also accommodates the larger ATV user group. Motorized ATV use will only be permitted on the designated trail system.*

(63) Some of the concrete block water bars installed several years ago have deteriorated to the point that large vehicles are having difficulty negotiating them resulting in ad hoc "run-arounds".... These run-arounds amount to (short) user created routes - directly in conflict with the Chapter 1, section E Need .. to "reduce proliferation of user created roads" in the EIS.

*Response: Unclassified routes, even to avoid an obstacle, are illegal. Vehicles going around obstacles and creating new routes are in violation of the Forest Plan. Road related problems should always be reported to the responsible District. As funds are made available, and the problems are verified, then maintenance will occur. Efforts to restrict vehicles from utilizing "run-arounds" will occur when the road is repaired.*

(63) At the two mile mark of Dakan Road (measured south from the Pike NF boundary) an old road heads east descending to an inactive quarry above Dry Gulch. Despite a "No Motor Vehicle" sign and several downed trees blocking the route, I have observed both motorcycle and ATV tracks on the heavily eroded road. I think your new plan should include new effort to protect the east side of Dakan Road from OHV use, perhaps with more fencing and signs.

*Response: The Proposed Action closes this road. This road will be rehabilitated and monitored to ensure no future motorized use occurs.*

(64) Proposal B - I can see the advantages of having this available to all users, the main concern that I have is controlling the erosion that has been a problem on the northwest side of Bear Mountain. Increased use will only make this a greater challenge.

*Response: Erosion cannot be used as the only criteria since proper trail design will mitigate erosion risks. A reroute was proposed in this location that addresses erosion issues. The USFS Trails Management Handbook provides construction guidelines and corrective measures that will be considered when planning and constructing trails in order to reduce the potential for erosion.*

(76) It appears from your study map that top of the world trail is not being considered for reopening, but we would appreciate reopening of 678 down to highway 67 and a possible long loop trail at the south end of the area.

*Response: Proposed trail closures are based on a number of considerations such as erosion, sensitive habitats, riparian areas, proximity to non-motorized use, private property, dead-ends, poor access and trail condition. A large single-track loop trail is proposed for the south end of the project area. Top-of-the-World Trail is outside the scope of the EA, as outlined in Chapter 2, page 2-14.*

(97) Of particular concern is road 504 which is designated as Maintenance Level 1. Access is currently thwarted by several large trees that have been felled to block the road. There is no fencing or signage. I inspected this road August 9, 2005, and found that this method of closure is inadequate. Fresh ATV tracks in the road indicate that ORV use continues. Closure needs to be more explicit and effective including substantial barricades and signs. Major restoration and rehabilitation are also necessary to control severe erosion problems that exist throughout the length of this old road. I support full decommissioning of this totally unnecessary road.

*Response: All Alternatives close this road. The South Platte Ranger District appreciates all information regarding criminal activities, including unlawful use of travel ways. Various methodologies are being implemented throughout the entire Pike National Forest to curb illegal use of travel ways. As funding permits, more effective barricades and additional signs will be installed.*

(97) A second area of concern is the designated parking area approximately 1.9 miles north of Rampart Range Road on the Dakan Mountain Road (UTM East 495203; North 4343182). A cable fence has been erected there to keep ORV users off the old road that goes east from the parking area. This appears to be inadequate. ...This locale needs improved signage and enforcement to keep motorized recreation west of the Dakan Mountain Road.

*Response: Though beyond the scope of the EA, the USFS has dedicated personnel focused on enforcing regulations relating to the motorized trail system. The Plan allows motorized uses only on designated trails. Areas such as this will be monitored to ensure that no future motorized use occurs and corrective action taken as needed.*

(97) ORV users from the RRMRA frequently venture out along other nearby roads. Where Stark Creek crosses the road parallel to the ATT right of way (UTM East 499257; North 4336363) there is a signed closure. It is frequently violated by dirt bikers. The result is severe damage to marsh areas. Barriers here need to be improved as does enforcement.

*Response: The Plan allows motorized uses only on designated trails. Law enforcement officers and forest protection officers enforce signed closures on the forest. When*

*closure effectiveness shortcomings are recognized, our goal is to improve the barriers to effectively close the area.*

*“Forest management activities in any wetland, riparian area, and flood plain, will be designed to prevent long and short-term adverse impacts, in accordance with Executive Orders 11988 and 11990, the direction outlined in Forest Service Manual, sections 2526, 2527, and 2633, and in Management Prescription 9A,” (PSICC Forest Plan).*

*Executive Order 11990 states, “all federal agencies shall provide leadership and take action to minimize the destruction, loss or degradation of wetlands.”*

*“Wetlands are those areas that are inundated by surface or ground water with a frequency sufficient to support a prevalence of vegetation that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, sloughs, potholes, wet meadows and river overflows,” (PSICC Forest Plan).*

*“Riparian areas are of great importance in acting as filters to trap pollutants such as sediment and preventing them from reaching the aquatic ecosystem. Riparian areas also reduce the impacts of floods by providing areas where the floodwaters can spread out thereby reducing their erosive velocities. Ox-bow ponds and lakes in floodplains are rich in life because they are rejuvenated, restocked and refertilized by periodic flooding,” (PSICC Forest Plan).*

*Areas such as this will be monitored to ensure no future motorized use occurs and corrective action taken is as needed. This area is also outside the Rampart Range Motorized Recreation Area.*

(97) The section between the junctions with Road 504 and Road 503 has serious problems. The “paver blocks” used to stabilize the road surface have failed miserably. The result is a mess of blocks littered about and difficult obstacles in the road created by the remaining blocks.

*Response: Road maintenance is ongoing and projects are continually prioritized by the USFS. Road related problems should always be reported to the responsible District. As funds are made available, and the problems are verified, then maintenance will occur.*

(92) Our concerns are: Failure to repair and police existing closed trails (a problem now which will only expand with the expanded trail system).

*Response: The Forest Service will dedicate funding, staff and equipment time to closing illegal trails in step with opening new trails. Forest Service closures are generally effective.*

(92) Our concerns are: Trails crossing streams and drainages, especially Polhemus Gulch (a live stream with fish) and the impact crossings will have on land, domestic water, and fish.

*Response: The Forest Plan does not prohibit vehicles from crossing streams. Trail crossings of perennial streams will be minimized. Consultation will occur with the Forest hydrologist and fisheries biologist to develop the proper structure required for the stream. Placement of the structure shall be in accordance with State and Federal laws regarding construction in and near waterways, including the placement of fill and measures to control sedimentation. Bridges and culverts will be routinely maintained to ensure unrestricted flow. Construction equipment will not operate in vegetative buffer except as necessary to construct fills. Disturbance of vegetation in waters of the United States during construction and maintenance of roads will be minimized. Polhemus Gulch is subject to the state antidegradation policy. This policy ensures that designated beneficial uses are maintained and protected.*

*“For all state waters existing classified uses and the level of water quality necessary to protect such uses shall be maintained and protected. No further water quality degradation is allowable which would interfere with or become injurious to these uses. The classified uses shall be deemed protected if the narrative and numerical standards are not exceeded,”*

*(CDPHE, Regulation 31- Basic Standards and Methodologies for Surface Water).*

*The Forest Plan states that all streams are subject to the standards of the State of Colorado Water Quality Control Act of 1973 and the 1983 and 1985 goals of the Federal Clean Water Act (CWA) of 1977.*

*Impacts to aquatic habitats are also addressed in the EA on page 3-35.*

(55)The discussion for Alternative A says that no changes are anticipated to trails and roads, but Table 2-1 shows some trail closures. Which is correct?

*Response: A number of roads and trails are currently closed and will most likely remain closed (dependent on resource condition). Additional trails in which resource damage is present are likely to be closed in the future, consistent with existing policies. In Alternatives B and C, roads and trails identified will be closed and restored. All non-system roads and trails will be decommissioned/closed or rehabilitated as stated in the EA on page 2-1 under paragraph B, Actions Common to All Alternatives.*

(55)How can “any facility or improvements in the trail system” be a part of all alternatives?

*Response: All Alternatives include limited improvements. Signage, fencing and other day-to-day maintenance are part of ongoing efforts and will still occur under the “No Action Alternative.” Alternative B and C include additional improvements as outlined in Chapter 2 of the EA.*

## **Safety**

(4) ...The area that needs the most attention is the “power line” trail near the start of the trail. This area with its hills makes a very dangerous section of blind hills.

*Response: Under the Proposed Action, Trail 690 is identified for reconstruction consistent with your comment.*

(20) More than once I have approached Rampart Range Road only to be met with an almost head-on collision from a vehicle turning onto Rampart Range Road. The hillcrest is dangerous and visibility is very limited until you get on top.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to the Proposed Action to address this concern.*

(30) Safety concern at the intersection of State Hwy and County Hwy 67 and Rampart Range Road (at the Indian Creek workstation) I would like to point out a safety concern at the referenced intersection. Both the vertical and the horizontal sight distance pose a hazard for vehicles turning left onto Rampart Range Road from southbound Hwy 67 and to a lesser degree turn movements onto north or southbound 67 from Rampart Range Road. I respectfully request that the intersection be considered in the referenced analysis/EA.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to the Proposed Action to address this concern.*

(33) ...the wide trails created by the trail-dozer and bi-directional ATV use need to be address for safety reasons.

*Response: Each trail will be designed with a width appropriate for single-track or ATV use. According to FSH 2309.18, single track trails should have a minimum tread width of 12 inches and ATV trails should have a minimum tread width of 4.2 feet*

(55) The purpose of the project includes safety of the road and trail system. However, this is never discussed further in the EA beyond the purpose and need section, especially in

Chapter 3. This should have been a key issue (and listed on Page 1-8) since it was in the purpose and need.

*Response: Safety considerations were considered in developing the Alternatives by generally avoiding steep slopes, minimizing road crossings, closing dangerous trails and not providing access to locations where unlicensed vehicles are not permitted (e.g. Highway 67). Safety considerations are also addressed under a number of disciplines such as Recreation and Transportation, part of trail design as well as being governed by other USFS, State and Federal regulations for the operation of OHV vehicles include 36 CFR 261.13. Most safety considerations apply to each alternative, rather than requiring separate consideration under each alternative.*

(71) In light of the expected increase in traffic, CDOT Region 1 Traffic Operations is concerned about safety at the Highway 67 and Rampart Range Road intersection.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to all alternatives to address this concern.*

(71) The existing intersection is located on a crest and has substandard sight distance, creating the potential for crashes between vehicles eastbound over the crest and vehicles turning left from westbound Highway 67 to Rampart Range Road or vehicles turning right from Rampart Range Road to eastbound Highway 67. Both of those turning movements are expected to have substantially increased volumes as use of the recreation area increases. A CDOT funded safety study, completed this summer, concluded that the intersection should be relocated approximately 800' to the east along Highway 67, where adequate sight distance exists, to mitigate the increased risk of accidents resulting from the expected increase in traffic.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to all alternatives to address this concern.*

(75) Eliminate two-way traffic on as many trails as possible by creating directional loops and duplicate trails adjacent to existing trails for one way traffic. With the increased use of the area collisions and near misses have become common place and a serious safety concern.

*Response: One-way trail would be impracticable to enforce and would increase the likelihood of high speed collisions. Riders are generally more aware and cautious on bidirectional routes.*

(88) The current entrance to Rampart Range Road is very dangerous, we have come very close to being hit by an oncoming vehicle more than once, they turn right in front of you onto Rampart Range Rd. There is no range of view; consideration of changing this intersection should be of utmost importance.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to the Proposed Action to address this concern.*

(91) ...We are most particularly still concerned with the problem of ingress/egress at the intersection of Highway 67 and Rampart Range Road. The Environmental Assessment does not address this particularly dangerous situation but instead shows a design for an entrance on page D-1 in Appendix D which will not alleviate the most dangerous situation existing at this entrance to the Rampart Range Motorized Area of Pike National Forest.

*Response: CDOT and Douglas County Public Works have also identified this issue and have recommended a 1,000 foot (approximately) road realignment of Rampart Range Road to improve intersection safety. The Highway 67 intersection with the Rampart Range Road is managed by CDOT, Douglas County and accesses Forest Service land. CDOT and Douglas County comments on this issue have been received. With their cooperation and input we will address this safety issue and incorporate it into this effort. This modification will be added to the Proposed Action to address this concern.*

### **Special Users Accessibility**

(17) It would be a shame to shut people out of that area. I know a lot of people that jeep, I also know a lot of people that can not get to the back country unless by vehicle. The handicap people should have a right to enjoy the mountains too. If you start shutting down all the jeeping roads then they will not be able to anymore.

*Response: The Proposed Action seeks to build upon the existing recreational opportunities currently available. Designated OHV trails/ 4 Wheel Drive are included as part of the proposed action in order to provide a variety of recreational opportunities (11 miles).*

(18) One of the primary reasons it is so overused is because access to motorized riding trails is being reduced at an alarming rate

*Response: The Proposed Action increases the amount of motorized trail available.*

(20) How are equestrian riders affected by this?

*Response: Conflicts with equestrian riders should be reduced as motorized trails were removed from several key areas frequented by equestrian users north of Highway 67, such as along the Colorado Trail. Noise levels along the existing non-motorized trail system may be reduced.*

### **Funding**

(18) Continue to use funds paid by OHV licenses to support maintenance of the trails, and creation of new trails. Raise funds if needed, or come up with ways to gain revenues from other users of National Forests.

*Response: Funding has previously been provided through the State Parks from the OHV registration fund, USFS, donations (e.g., private corporations) and non-profit groups (e.g., Tread Lightly). Efforts to fund the plan will continue through these mechanisms.*

(37) I can see the advantages proposed in both alternative B and C...but I see no evidence regarding securing funding to re-route trails that will be closed if either of the alternatives is chosen.

*Response: Funding is provided through the State Parks from the OHV registration fund, USFS, donations (e.g., private corporations) and non-profit groups (e.g., Tread Lightly). Efforts to fund the plan will continue through these mechanisms.*

(43) # B. Sounds good but where is the guarantee that once these trails are closed that there will indeed be funding for re-routing after you have closed 26 miles of trails in # B ? # C. The same goes for alternative # C, it's too easy to just close trails and not re-open them.

*Response: Trail construction will be based on available USFS funding, funding by non-profit groups and volunteer activities. New trail construction is planned to start in 2005. The USFS will annually construct new trail. The amount of new trail will depend on available funding, staffing and trail construction difficulty.*

(55) How would the improvements be funded? Would funds be pulled from other Forest needs?

*Response: Funding is provided through the State Parks from the OHV registration fund, USFS, donations (e.g., private corporations) and non-profit groups (e.g., Tread Lightly). Efforts to fund the plan will continue through these mechanisms. These groups have participated in the planning of the Proposed Action. USFS funds are prioritized annually based on need and are approved by the District Ranger.*

(55) ... the cost sheet for Alternative C also shows costs for seven fee tubes. Would fees actually be collected to help offset project costs? This is not mentioned anywhere in the EA.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment including fees.*

(61) Appendix D shows that Proposed Alternative C would cost almost \$2.4 million. This is a lot of money to be spent on only a small segment of the population. The report shows that OHV use is only 10% of the activity in the project area. The other 90% of the activity is un-addressed.

*Response: The Plan addresses the Purpose and Need outlined in Chapter 1, primarily the motorized road and trail system. Other elements are outside the scope of this document. OHV use on the RRMRA would be higher than on other areas of the Forest. Historic funding has come from OHV registration fees which the users of the area contribute to. A number of other funding sources will be used to implement the Plan, including State Grant and donations.*

(82) ... There is a plan to spend somewhere in excess of 850 thousand dollars on a Visitor Center. No one I know of who uses the Forest will derive any proportionate benefit from that expense. Please drop it.

*Response: A new visitor contact station is one of many components of the Proposed Action. Its implementation will be based on funding and assessment of current needs at the time. Trail construction will begin in 2005 and will continue annually as funding permits.*

(82) I also note that 7 fee tubes are in the budget for \$10,500. Is Rampart to become a fee area? Why was that kept a secret?

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. The cost estimate outlines all possible design features, but the inclusion of fee tubes is an element that is beyond the scope of this project, but was included to determine the range of potential costs. Additional analysis would be necessary to evaluate the benefits and consequences of fees.*

(84) I feel if push came to shove, spending limited available funding on kiosks and parking lot improvements should be a very low priority. It is more important to commit the limited resources to trail maintenance, than it is on completely unnecessary frills.

*Response: USFS will prioritize funding annually based on current needs.*

(86) The Forest Service spending approximately \$2.4 million in capital expenditures to expand motorized recreation opportunities seems inappropriate, especially given the current challenging fiscal situation of our land management agencies.

*Response: USFS will prioritize funding annually based on current needs and will be phased over time. A number of funding sources will be used to implement, the Plan including State Grant and donations.*

(88) Your plans to improve these trails should be paid for by the people who use them, they should be charged on a daily basis, and the amount charged should be enough to maintain the trails. It's no different than going into any park or going skiing and paying the fees.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment including fees.*

(91) Finally, we are concerned about the extreme cost for supporting a relatively small number of a special interest group consisting of OHV recreational forest users.

*Response: USFS will prioritize funding annually based on current needs and funding will be phased. A number of funding sources will be used to implement the Plan including State Grant and donations. Historic funding has come from OHV registration fees which the users of the area contribute to.*

(92) Who is paying for the study and, more importantly, where will the money come from to implement the results? Is there any money to expand the parking areas?

*Response: The USFS is the oversight agency. Funding for the Plan was provided by the USFS and State Trails grants. USFS will prioritize funding annually based on current needs and will be phased over time. A number of funding sources will be used to implement the Plan, including State Grant and donations.*

(55) In the comparison of alternatives, how would spreading construction over a 5- to 10-year period ensure adequate maintenance funding? And how would Alternative C cause a slight increase in expenditures at local businesses compared with Alternatives A and B, when "recreational demands in the area will continue to be similar for all alternatives" (page 3-69).

*Response: Funding, for both construction and maintenance will vary annually as projects are implemented and needs change. As the system changes, the closure of problem trails and the reconstruction/construction of trails, maintenance dollars and activities should change as the system changes. By phasing projects being over time, this will allow the system to be monitored and activities modified accordingly.*

## **Environment**

(20) I am concerned about the impact on the environment these Off-road vehicles make. More off road trails are not needed. I believe the National Forest Service should start charging more than a donation fee for the use of these trails. How does all these off-roaders affect the poor animals who live within the area?

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment including fees. The Biological Resource section in the EA (EA, page 3-28 through 3-46) and the Biological Assessment/Evaluation addresses impacts to wildlife.*

(55)The discussion of direct and indirect effects should discuss the interaction between miles of road and trail in various erosion ratings of soils and how the alternatives respond to this issue.

*Response: As stated in the EA (EA, page 3-10), the primary impacts are associated with poor trail alignment. Soil erosion ratings are one indication of erodibility and was reviewed. Most potential impacts are associated with specific trail placement and trail construction standards. New trails will be designed to avoid erosion impacts as discussed in the document.*

(55)Why does the cumulative effects section for Alternative A include livestock grazing? According to Page 1-9, there is no livestock grazing in the project area.

*Response: There is no livestock use on RRMRA. It is mentioned in the cumulative impacts section as a potential impact, but does not state that grazing occurs within the project area. Grazing could occur outside the RRMRA or could be permitted within in the future.*

(55) Why does the environmental consequences section for land use mention access?

*Response: The Land Use (EA, page 3-56) section addresses access to private lands, including trespassing and potential impacts to private land holdings.*

## **Facilities**

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96)  
Do not build a new visitor center or pave any part of Rampart Range road. This money would be better spent building and maintaining the trails, restroom facilities and improving the dispersed camping sites.

*Response: The paving of Rampart Range Road is considered for maintenance purposes of this high use area. Other paving will occur within the parking areas to formalize*

*parking spaces and to reduce maintenance. A small visitor contact station would be necessary if use continues to increase in order to provide information, restrooms and other services. The decision to construct this facility would be based on the availability of funding and need.*

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 31, 33, 34, 35, 36, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Install better designed and more effective trailhead barriers on all of the single-track trail sections to keep ATV's and larger vehicles off of those trails.

*Response: As trails are constructed, design elements such as gates, trail design, signage and other tools will be used to limit use to key user types.*

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Complete all of the new trail related projects before starting any construction of new facilities. Most OHV Riders would rather have more trails and a better trail experience than new facilities like a visitor's center, developed parking areas and paved roads. Studies conducted by Colorado State University have supported this.

*Response: A new visitor contact station is one of many components of the Proposed Action. It is likely that funding for the visitor contact station will not become available in the near future. Implementation will be based on funding and assessment of current needs at the time. Trail construction will begin in 2005 and will continue annually as funding permits.*

(25) My only concern is the visitor center? Do we really need this?

*Response: A new visitor contact station is one of many components of the Proposed Action. Implementation will be based on funding and assessment of current needs at the time.*

(28) We do not support the construction of a new visitor center, or paving any part of Rampart Range Road. This money would be better spent building and maintaining the trails, restroom facilities and improving the dispersed camping sites. ...We recommend the installation of better designed and more effective trailhead barriers on all of the single-track trail sections to keep ATV's and larger vehicles off of those trails. While ATV's enjoy many of the same features of a trail as do motorcyclists, opening up single track trails to ATV width diminishes the experience for motorcyclists. Having trails for both uses is critical, and it won't take a great deal more effort to maintain the separation.

*Response: A new visitor contact station is one of many components of the Proposed Action. Its implementation will be based on funding and assessment of current needs at the time. Rampart Range Road would only be paved in the immediate vicinity of the parking area at the intersection of Rampart Range Road and Highway 67. Other paving will occur within the parking areas to formalize parking spaces and reduce maintenance.*

*There are no plans to pave the remainder of Rampart Range Road at this time. Existing single track trails will be “retrofitted” and new single track trail and trailheads will be designed so that ATVs will not be able to access these routes.*

(44) There are zero fee tubes indicated for Alt. A and Alt. B. There is no mention of fees or fee tubes anywhere else in this EA. But 7 of them being indicated for installation in Alt. C suggests that USAGE FEES for the Rampart area, not mentioned elsewhere in the EA and therefore not referred to the public and consequently not commented upon by the public, may be fixed in the mind of the USFS, possibly as a late addition to the implementation of this EA. I believe that such an addition to this EA would invalidate it.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. The cost estimate outlines all possible design features; the inclusion of fee tubes is an element that is beyond the scope of this project, but was included to determine the range of potential costs.*

(55) In Table 2-2, the Dutch Fred facilities are shown as “NA” for Alternatives B and C but no explanation is provided for this. What would happen with Dutch Fred?

*Response: Improvements to Dutch Fred have already been completed or approved as part of the Dutch Fred OHV Project EA, 2001.*

(55) Map 2-2 shows expanded parking areas under Alternative B, but the text on Page 2-2 says expansions would not occur. These are also not included in Table 2-2. Which is correct?

*Response: No expansions would occur as stated in the EA text. The map legend is in error.*

(92) Our concerns are: Lack of parking at access areas.

*Response: Alternative C expands and formalizes the parking areas.*

(94) It would be more enjoyable if there were campgrounds that off road motorized vehicles were not allowed. The noise is intrusive to those of us who don't share the interest but do enjoy sharing the outdoors.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. Campgrounds are an element that is beyond the scope of this project.*

## **Private Land**

(27) In Plans B and C there are two expanded parking areas adjacent to our property. On the map for Alternative C, they are located at 1.5 mile. I do not believe any private land owner would be comfortable with this. Please move these parking areas south where they would be surrounded by Pike National Forest.

*Response: No new parking areas are planned in any Alternative. Expansion to the existing parking areas would only occur in Alternative C. Improvements to this parking area would help to reduce informal parking in the area and concentrate parking to the designated parking areas.*

(58) If the trails on the North side of 67 are kept or expanded reroute them away from the private properties. There are several points in which a short trail adjustment could take the bikers at least a half mile from our property utilizing the existing trail.

*Response: During trail construction, on-site opportunities including terrain, trail siting and other factors will be used to further reduce the potential for impacts to private in-holdings.*

(92) Private property owners want to know how enforcement will be provided

*Response: Overall enforcement is determined at the Forest level and is directed to areas that need it and is outside the scope of this EA. All private property complaints will be addressed by the USFS and local law enforcement. In addition, all informal, non-designated trails will be closed as part of the Plan. The Plan stresses a formalized trail system. The design of the trail system will encourage the use of a formalized trail system, education of trail users will also be emphasized by providing information at kiosks and new signage, and the overall trail system, focused on loops will improve enforcement.*

(98) What recourse do we as landowners have when motor vehicles go off the legal trails, as has happened in the past, and cause damage to private property? Does the Forest Service care about the noise, which certainly impacts the livability and value of our private property?

*Response: Overall enforcement is determined at the Forest level and is directed to areas that need it and is outside the scope of this EA. All private property complaints will be addressed by the USFS and local law enforcement. Land use and noise were among the many factors analyzed in the EA (see pages 3-56 and 3-59) and considered during Alternative development. The Forest Service does care about noise issues and noise issues were considered an important factor in trail design.*

(100) Who will be responsible for the homes security and protection? Has your group visited these trails to observe the abuse and disregard of the forest and wildlife?

*Response: Overall enforcement is determined at the Forest level and is directed to areas that need it (outside the scope of this EA). Private property complaints are addressed by*

*the USFS and county law enforcement. A trail field assessment was conducted in the early phases of the EA to observe site specific issues.*

(92) Our concerns are: ATV trails too close to major housing areas such as North Rainbow Falls and to agricultural areas.

*Response: Overall guidance for the allowable types and levels of use of motorized activities is based on the 1984 PSICC Forest Plan. This plan was reviewed prior to planning any new trails. Trail densities in some areas were decreased based on resource considerations; in other locations, new trails were added during the design phase of the trail. Site-specific considerations such as topography will be used to reduce the potential impacts of noise on local residences. Public comment was also considered when planning the new trails.*

### **Miscellaneous**

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Develop an area to practice trials riding. Parts of trail #692 would work well for this type of riding.

*Response: Trail 692 was removed due to constraints from non-motorized trails, equestrian use, severe slopes, proximity to 4b Management Areas, sensitive wildlife areas and stream crossings.*

(10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Develop an ATV play area, so that the riders of these vehicles won't be tempted to use the trails or parking areas for this activity.

*Response: Due to the potential for resource damage, no areas have been identified as suitable for this activity. In the 2001 Dutch Fred EA we rehabilitated a similar uncontrolled play area.*

(9, 10, 11, 12, 14, 15, 16, 19, 21, 22, 23, 26, 28, 31, 33, 34, 35, 36, 40, 42, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 62, 66, 67, 68, 69, 72, 74, 77, 78, 79, 80, 81, 82, 83, 85, 87, 89, 96) Allow more dispersed camping and campsites further from Rampart Range Road, this would help to disperse the use of the trails in the trail system.

*Response: As stated in the EA (EA, page 2-14), elements not outlined in Chapter 1 are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities.*

(61) Firearms are also a concern. Several years ago my wife and her children were playing around our community lake. Suddenly several shots were fired and bullets came whizzing over their heads.

*Response: The Rampart is currently closed to recreational shooting. As stated in the EA (EA, page 2-14), elements not outlined in Chapter 1 are not included in an Alternative. These include, but are not limited to camping, firearms, fire, fees, winter use, hiking, non-motorized use and other recreation activities. Firearms are an element that is beyond the scope of this project.*

(98) How was the notice or information about the Analysis brought to the attention of the general public? And where and when were the public meetings held for the purpose of information and questions and comments from the interested and effected public?

*Response: As stated in the EA (EA, page 1-6), "Project initiation letters were sent to tribal governments and Certified Local County Governments to solicit input and associated information. Scoping for the current proposal was initiated with notification in local newspapers, notification on the website and a mailing to over 300 persons either known to be interested in similar projects or who had asked to be informed of such projects or of the proposed project. Over 300 people attended two open houses that were held in July 2004. The open houses provided the public an opportunity to gain information on the project and to share information and their concerns and ideas. As a result of the open houses and subsequent public input, more than 500 comments were received. ...Based on comments received and internal ID team workshops, three road and trail concepts were developed."*

(99) It is incorrect to state in your management plan that residents in this area have been involved in this planning. We are very concerned about trails crossing Pohlemus Gulch.

*Response: Public involvement activities are summarized on page 1-6 of the EA. Two trails were also closed to the northwest and southeast of North Rainbow Falls under all alternatives.*

(101) Motors increase the fire hazard. Further clearing of berry bushes, etc. creates a bigger hungry bear problem.

*Response: Large non-motorized areas were created as part of Alternative C. Overall, this will have a beneficial impact on wildlife. Fire hazards have been assessed in Chapter 3.*

(98) Who will patrol these motorized trails to enforce the rules and laws regarding not only the vehicles, but also wild camping, open fires, firearms and discharge of firearms?

*Response: Though beyond the scope of the EA, the USFS has dedicated personnel focused on enforcing regulations relating to the motorized trail system.*

(92) How do you propose to deal with the highly erosive, rocky, steep slopes?

*Response: Trails will be constructed to avoid high risk areas including steep slopes and areas with highly erodible soils on-site. Erosion cannot be used as the only criteria since proper trail design will mitigate erosion risks. The USFS Trails Management Handbook provides construction guidelines that will be followed to reduce the potential for erosion.*

(98) How will the appropriate authorities assist an accident victim on a trail on the East side of North Rainbow Falls Park? How will you get to the accident?

*Response: In all accident situations, a number of responses are used, including helicopter, ATV, vehicle and on-foot depending on the severity and location of the incident.*

(92) Our concerns are: Pollution, both noise and air.

*Response: Air and noise impacts have been addressed beginning on pages 3-21 and 3-59, respectively.*

(55) Page 1-8 says the Roads Analysis was completed based on the final alternatives. However, the roads analysis does not deal with alternatives. In fact, its recommendations did not even make it into an alternative. The roads analysis should have been done first, and included trails, to form the initial proposed action. There is no real point to doing a roads analysis after the alternatives are developed, other than to meet a requirement. Chapter 1 should also mention issues analyzed in detail, but not key issues (for example, air or heritage resources). What is the basis for discussing the non-key issues in detail?

*Response: The Road Analysis recommendations were completed before the Alternatives were developed. These recommendations were incorporated into the final alternatives, which ensured adequate public comment.*

*The emphasis on these issues and de-emphasis on non key issues is consistent with NEPA regulations. As described in Chapter 1 (EA - page 1-8), all issues listed as key issues were developed during agency and public scoping. No non-key issues are listed in the key issues section. Each key issue is analyzed in detail in Chapter 3. Issues not selected for detailed analysis are also listed in the next section.*

(55) How can all damage to soil, water, and other resources be “avoided”?

*Response: Minimize may be a better description than "avoided". The construction of the trails will be conducted in a manner to protect these resources. New construction of trails will be located and designed to limit the potential for erosion and impacts associated with water crossings. This will be accomplished by building bridges or hardening these crossings. The location and construction of trails shall also be in accordance with State and Federal laws regarding construction. For example:*

*“For all state waters existing classified uses and the level of water quality necessary to protect such uses shall be maintained and protected. No further water quality*

*degradation is allowable which would interfere with or become injurious to these uses. The classified uses shall be deemed protected if the narrative and numerical standards are not exceeded.”*

*(CDPHE, Regulation 31- Basic Standards and Methodologies for Surface Water).*

*The Forest Plan states that all streams are subject to the standards of the State of Colorado Water Quality Control Act of 1973 and the 1983 and 1985 goals of the Federal Clean Water Act (CWA) of 1977.*

*“Forest management activities in any wetland, riparian area, and flood plain, will be designed to prevent long and short-term adverse impacts, in accordance with Executive Orders 11988 and 11990, the direction outlined in Forest Service Manual, sections 2526, 2527, and 2633, and in Management Prescription 9A,” (PSICC Forest Plan).*

*Executive Order 11990 states, “all federal agencies shall provide leadership and take action to minimize the destruction, loss or degradation of wetlands.”*

*“Wetlands are those areas that are inundated by surface or ground water with a frequency sufficient to support a prevalence of vegetation that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, sloughs, potholes, wet meadows and river overflows,” (PSICC Forest Plan).*

*“Riparian areas are of great importance in acting as filters to trap pollutants such as sediment and preventing them from reaching the aquatic ecosystem. Riparian areas also reduce the impacts of floods by providing areas where the floodwaters can spread out thereby reducing their erosive velocities. Ox-bow ponds and lakes in floodplains are rich in life because they are rejuvenated, restocked and refertilized by periodic flooding,” (PSICC Forest Plan).*

(55) The cumulative effects section says: “Improvements in livestock grazing...” Page 1-9 says there is no livestock grazing in the project area. Which is correct?

*Response: There is no livestock use on RRMRA. It is mentioned in the cumulative impacts section as a potential impact, but does not state that grazing occurs within the project area. Grazing could occur outside the RRMRA or could be permitted within in the future.*

(55) Why is there no mention of unavoidable adverse effects or the relationship between short-term uses and long-term productivity in this section? Both of these items are critical in all EAs and EISs. The lack of these disclosures is a fatal flaw in this document. While there may be no irreversible commitments in any alternatives, there are clearly irretrievable commitments of resources. What about loss of vegetation and soil productivity and wildlife habitats?

*Response: Discussion of irretrievable and irreversible commitment of resources is not required for an EA. This section requirement is only applicable to Environmental Impact Statements (EIS). However, general impacts, whether short- or long-term are described within each section of the EA and are summarized in Table 2-3. The table and each section summarize the resulting impacts including losses and gains in vegetation, wildlife habitat and riparian habitat. The closure of problem roads and trails (located in riparian areas, causing erosion, located on steep slopes, etc.) and the construction and reconstruction of trails according to standards that reduce erosion would have long-term beneficial effects on the resources of the area. Any short-term effects, such as sedimentation, would be minimized through use of Best Management Practices as described in Chapter 2.*

*Also, NEPA Section 102 C.v., the procedural requirements of the law, requires that a detailed statement (the environmental impact statement is the required “detailed statement”) include identification of “...any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented,” (Section 102, C, v\*). The requirement for disclosing irreversible and irretrievable commitment of resources is only applicable for an Environmental Impact Statement (EIS). Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that the use of these resources have on future generations. According to Forest Service Handbook 1909.15, the following definitions apply:*

*Irreversible. A term that describes the loss of future options. Applies primarily to the effects of use of nonrenewable resources, such as minerals or cultural resources, or to those factors, such as soil productivity that are renewable only over long periods of time.*

*Irretrievable. A term that applies to the loss of production, harvest, or use of natural resources. For example, some or all of the timber production from an area is lost irretrievably while an area is serving as a winter sports site. The production lost is irretrievable, but the action is not irreversible. If the use changes, it is possible to resume timber production.*

*In the case of the Proposed Action, no non-renewable resources (irretrievable) will be used except during construction (etc., gasoline). Since all other resources could be replaced over a reasonable time frame, they are not irretrievable. For example, vegetation could be restored if a trail was closed. A summary section to this effect is not required as part of an EA.*

*\*Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94-52, July 3, 1974, and Pub. L. 94-83, August 9, 1975, as amended and reprinted 1992.*

(55) What is the purpose of the Reasonably Foreseeable Future Actions statement?

*Response: Summary statement of general actions that will occur within the project area. Additional information can be found in Chapter 3, within each section of the EA.*

(55) In Step 3, many of the issue statements do not discuss issues. These should be brief statements that consider the ways that roads and trails affect each resource. Step 3 should focus on road-related issues. For example, what is the roads-related issue with heritage resources?

*Response: As stated in the Roads Analysis: Informing Decisions About Managing the National Forest Transportation System, 1999, the analysis deals primarily with roads, not trails and is simply a conceptual framework that may be readily integrated into any process in which the roads are examined. Step 3 serves to identify issues as shown on C-11 to C-13. In some cases, the mere presence of sensitive resource is the issue, as found in Section D, Heritage. However, additional information on issues is found throughout the analysis.*

(55) Why are vegetation, timber harvest, and fuels management lumped into one issue?

*Response: In this case, it was more effective to combine the topic under this heading. Additional issues related to trails (Chapter 2) and discussions by individual resource topics are found in the remaining sections of the Roads Analysis and in Chapter 3 of the EA.*

(55) What is the difference between Appendix G and Appendix H? It appears that Appendix G is a draft version and Appendix H is the final, but why include both?

*As stated in the spreadsheet title, Appendix G is the Interdisciplinary Team Road Maintenance Recommendations and Appendix H is the Recommendations after Line Officer/District Review. In some cases it is important to include both spreadsheets if recommendations differ.*

### **Aquatic Habitats and Hydrology**

(44) There is no evidence presented, that has been researched onsite in and about the various streams and trails that run parallel to one another or where the trail is in the streambed, to indicate that the relationship of this individual trail to this individual stream does in fact conform to the generalized claims that such relationships are bad for the forest.

...It has not been adequately demonstrated that, in actual fact, there is compelling need to close them. These are not scientifically supported closures...Most changes that motorized trails have made to streams and riparian areas over the decades are simply changes, not bad, not good, just different. If the proposed action insists on closing those trail sections associated with streams and riparian areas, then it must demonstrate, via good, onsite, peer reviewed, scientific evidence that any changes being made to those natural systems are necessarily terrible, non-mitigable, and will result in destruction of, not change to, those systems. If such demonstration cannot be made, then trails or portions of trail 676 and trail 692 (the Bear Creek loop) and trail 649 (along and through Trout Creek) and trail 693 (Russel Gulch) that are proposed for closure must NOT be

closed -- closure would not be right or fair or lawful and would destroy the most valuable resource of all, user opportunity.

*Response: Numerous studies (Furniss, 2000; USDA Forest Service, 2000b; MacDonald and Stednick, 2003; Bash et. al. 2001; and the Hayman Fire Roads Management Project Environmental Assessment, 2004) have demonstrated the detrimental effects of instream roads and trails on aquatic life and habitat. Loss of riparian vegetation and sediment pollution from roads has been shown to reduce stream production potential for aquatic organisms. Road-stream crossings and improperly placed culverts can reduce or eliminate fish passage. In many disturbed areas, vehicles have driven on, around and through the stream banks removing stabilizing vegetation and causing bank erosion that contributes to higher sediment loads downstream. Furthermore, wherever a connection exists between a road and the surrounding environment, accelerated water runoff, sediments and road-associated chemicals, such as oil or gasoline spills, generated on the road surface and cutslope, have a direct route to the natural channel network and surface waters. The Forest Plan does not permit the creation or existence of motorized trails in stream channels.*

(55) Under Alternative A, how many trails (how many miles) would remain along riparian areas? How much larger would the affected riparian areas be?

*Response: Table 3-5 (page 3-18) outlines the miles of trails in riparian habitat for each Alternative. The amount of riparian area affected is reduced in all Alternatives. If all closures remain in place in Alternative A, the number of miles in riparian would drop from 12.23 in Alternative A to 11.23 miles.*

(55) Under Alternative B, would streams really be re-located from the stream bottoms to adjacent land? What does the U. S. Army Corps of Engineers have to say about this?

*Response: Streams would not be moved, however trails would be. If actions occur in waters of the U.S., the U. S. Army Corps of Engineers will be consulted.*

(55) Would effects to wetlands and other waters of the U.S. be addressed through the U.S. Army Corps of Engineers permitting process?

*Response: Yes, where required.*

(55) Considering the potential effects of the project on watershed issues, why was no modeling done to quantify cumulative watershed effects?

*Response: The USFS ID team with knowledge of past, present and future activities assisted with impact assessment. The level of analysis within the EA is sufficient to determine impacts. This project did not warrant the creation of a model approach. The minor increment of additional information a model would provide would not be necessary for the decision to be made.*

(55) The cumulative effects to watersheds (soil erosion and sediment production) need to be considered in much greater detail. This section should include some type of cumulative watershed effects modeling.

*Response: Cumulative effects are addressed in Chapter 3, within each section of the EA. The USFS ID team with knowledge of past, present and future activities assisted with impact assessment. The level of analysis within the EA is sufficient to determine impacts. Watershed monitoring is an ongoing effort on the South Platte Ranger District. In addition, see above response.*

(55) Was a 100-foot or 200-foot WIZ used?

*Response: A 200-foot corridor, centered on the stream, 100 feet to either side was used.*

(55) Discussion of South Platte Wild and Scenic River seems more like a land use or recreation issue. What does this have to do with the hydrology issue?

*Response: All of the South Platte River Wild and Scenic study corridor and most of the North Fork of the South Platte River study corridor lie within the boundaries of the Pike National Forest. The Wild and Scenic River (WSR) is mentioned in the hydrology section because of the potential for impacts to water quality and aquatic habitat in tributaries of the North and South Platte River corridors within the project area. The RRMRA's primary effect on WSR eligibility-related values pertains to the adverse effect on downstream fisheries caused by increased sediment yield from the RRMRA. Roads located directly in stream channel bottoms play a role in the delivery of these sediments to the WSR corridor.*

(55) How would Alternative A result in more trails in the WIZ? Compared to what?

*Response: Trails are removed from the WIZ in Alternatives B and C, where they remain in Alternative A.*

(55) What is the basis for predicting higher cumulative effects under Alternative A?

*Response: "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time," (40 CFR 1508.7). Because trails remain within riparian and drainage areas, the cumulative impacts of ongoing use will continue to affect these resources whereas trails are removed permanently from these areas in Alternatives B and C.*

(55) Explain the basis for the comparison of alternatives. Table 3-5 (Page 3-18) shows that Alternative B would have less effect than either Alternative A or Alternative C. Table 3-5 is the only quantification of effects in this section, so why is it not presented front where it could be used to support the environmental consequences section, rather than the very end of the section?

*Response: The table provides a quick summary and therefore in this case was under “Comparison of Alternatives” within the same section.*

(55) AQ1: A 100-foot WIZ is used most places (but not all) in the EA, as well as Appendix I as referenced in this answer. Was a 100-foot or 200-foot WIZ used?

*Response: A 200-foot corridor, centered on the stream, 100 feet to either side was used.*

(55) AQ3: The last paragraph of this answer discusses the “remainder of this response.” Where is this?

*Response: The remainder of this response refers to the subsequent responses and appendices. The sentence should read: “The Appendix depicts the potential risk by road.”*

(55) AQ6: How does “Aquatic Risk” in Appendix H translate into hydrologic connectivity? Does the writer even understand what hydrologic connectivity is?

*Response: AQ6 correctly explains the principle of hydrologic connectivity. Hydrologic connectivity is where surface flows are continuous between roads and streams, such as where inboard ditches convey road runoff to stream channels, the road generating or receiving the runoff is considered “hydrologically connected” to the stream network. Wherever a hydrologic connection exists, accelerated runoff, sediments and road-associated chemicals, such as spills or oils, generated on the road surface and cutslope have a direct route to the natural channel network and surface waters. In other words, a hydrologically-connected road becomes part of the stream network. According to the USFS Rocky Mountain Research Station, a working definition of Hydrologically-Connected Road is: “Any road segment that, during a ‘design’ runoff event, has a continuous surface flow path between any part of the road prism and a natural stream channel,” (Furniss et. al. 2004; USFS RMRS).*

*Appendix H of the Roads Analysis does not presume to translate aquatic risk into hydrologic connectivity. The degree of hydrologic connectivity determines the level of aquatic risk from roadways. Roads listed in Appendix H are rated for numerous risk factors, including aquatic risk.*

(55) AQ7: What about other downstream beneficial uses on the South Platte? Some water surely is put to beneficial use below Denver and Aurora. And surely there are other uses than drinking water?

*Response: The response focuses on downstream use relating to water supply (residential, commercial and agricultural demand). Other beneficial uses would include benefits to wildlife and recreational uses.*

(55) AQ8: How does “Aquatic Risk” in Appendix H translate into effects to wetlands?

*Response: See response to AQ6 above. The degree of hydrologic connectivity determines the level of aquatic risk from roadways. Wetlands are one component of the aquatic system that may be at risk.*

(55) AQ9: How is this answer related to the analysis area? There needs to be some inclusion of site-specific data, rather than a general summary of potential effects.

*Response: The response to AQ9 describes how stream systems changed with re-deposited streambed materials and are affected by road alignments. This is relevant to roads in the study area, especially when roads are in close proximity to streams. The EA, BA/BE, Wildlife Report and the remainder of the Roads Analysis, including Appendix I, all provide additional site specific information.*

(55) AQ10: How can recommendations for changes to the road system be made without information on the effects of culverts on fish migration?

*Response: Alternative C and the Roads Analysis propose only to close roads and not to open any new ones; therefore no culverts for roads are needed. Replacement of culverts will be based on the best known information at that time.*

(55) AQ11: How is this answer related to the analysis area? There needs to be some inclusion of site-specific data, rather than a general summary of potential effects.

*Response: The response to AQ11 answers the question of the effect of shading on riparian plant communities. No specific studies/inventories have been completed in the project area on this subject. The EA, BA/BE, Wildlife Report and the remainder of the Roads Analysis, including Appendix I, all provide additional site specific information relating to aquatic resources and riparian impacts.*

(55) AQ12: This question is specific to at-risk species. Are there any in the analysis area and how are they affected by roads?

*Response: There are no at-risk aquatic species in the analysis area.*

(55) AQ13: Besides whirling disease, are there any other non-native aquatic species of concern?

*Response: New Zealand mud snails have recently been located upstream of Cheesman Reservoir. This non-native snail has the ability to reproduce quickly and mass in high densities. They could potentially impact fish food organisms reducing fish production as they spread.*

(55) WP1: Are there any water systems in the analysis area?

*Response: The South Platte River, Strontia Springs Reservoir and associated diversions and impoundments are parts of the Denver Water supply system.*

(55) WP2: What reservoir and hydroelectric facility are discussed here?

*Response: Strontia Springs Reservoir and its small hydroelectric facility*

### **General**

(55) The quality and depth of the analysis also appears to be lacking. There is little attempt to quantify the effects of the alternatives on the various resources discussed in Chapter 3.

*Response: The level of analysis is sufficient to determine if significant impacts would result from project implementation. The analysis was also reviewed by a USFS Interdisciplinary Team.*

(55) The EA should be re-issued for further public comment before a decision is made because of the poor quality of the current analysis.

*Response: The level of analysis is sufficient to determine if significant impacts would result from project implementation. The analysis was also reviewed by a USFS Interdisciplinary Team. The process included working with the public; local, state and federal agencies; and non-profit organizations to develop alternatives and identify issues. The public has also been offered opportunities to comment on alternatives early in the project as well as provide comments on the draft assessment.*

(55) The document needs to thoroughly discuss compliance of each alternative with the Forest Plan and other applicable laws and regulations

*Response: Please see Chapter 2 of the EA. The USFS will comply with all laws and regulations.*

(55) The descriptions of the alternatives need to be greatly expanded to clarify the scope of each alternative.

*Response: The description of the alternatives is sufficient to understand the actions.*

(55) Efforts to quantify potential effects need to be greatly expanded. The vague language throughout the EA is insufficient. Assertions should be supported with the scientific literature or new quantitative analysis.

*Response: The level of analysis is sufficient to determine if significant impacts would result from project implementation. The analysis was also reviewed by a USFS Interdisciplinary Team. A reference section is provided in Appendix B: References and in Appendix C: Roads Analysis.*

(55) It would be helpful to include a map of the management areas (MAs) in the project area in this chapter.

*Response: Management area maps are available within the PSICC Forest Plan.*

(55) Why was Colorado Division of Wildlife vegetation data used for the analysis and not U.S. Forest Service vegetation data?

*Response: The USFS dataset was developed by the Colorado Division of Wildlife in this case. We thought the Colorado Division of Wildlife data was better data for analysis of this project.*

(55) The cumulative effects sections for each resource need to be specific about the past, present, and reasonably foreseeable future actions in the analysis area, such as prescribed and wildland fire, vegetation management, roads and trails, and others.

*Response: All cumulative impact discussions have assessed the incremental impacts of the actions in the past, present, and reasonably foreseeable future. USFS representatives were consulted to determine the cumulative impacts of past and future projects within the project area.*

(55) The EA states: “All three action alternatives decommission roads and eliminate crossings of intermittent streams at five locations”. In Chapter 2, there are only two action alternatives and a no-action. What is the third action alternative? Also, Chapter 2 does not show any decommissioning of roads. Which is correct?

*Response: The EA included three alternatives (Alternative A – No Action, Alternative B, and Alternative C). Consistent with forest management, the No Action Alternative could include closure of roads and trails due to resource damage.*

(55) In relation to Alternatives B and C, I have several questions: With the deferred maintenance backlog, how would this affect the maintenance needs for the rest of the Forest? How will enforcement needs be met? Currently, there does not appear to be enough enforcement, since non-system trails keep developing. How will the closed trails be kept closed?

*Response: Though beyond the scope of the EA, the USFS has dedicated personnel focused on enforcing regulations relating to the motorized trail system. The design of the trails should reduce the maintenance costs of each trail (erosion). Enforcement should be improved because the trail system is formalized, including the additional of loop trails which are easier to enforce and the creation of formalized parking areas to provide rule and regulations.*

(55) The future connection to the Pikes Peak Ranger District (Alternative C) should be considered in the cumulative effects analysis for all resources. (Page 2-4)

*Response: The EA states, "... a future connection to the Pikes Peak Ranger District, which would be addressed as part of a separate planning and NEPA assessment," (page 2-4). It is unknown at this time whether this is viable option. This concern was noted during public scoping.*

(55) Are the "Mitigation Measures Common to All Alternatives" also applicable to Alternative A? The title implies this, but the measures repeatedly discuss "action alternatives". (Page 2-11)

*Response: Mitigation Measures apply to all Alternatives, but are most applicable to new and reconstructed trails as described in Alternatives B and C.*

(55) (Re: Appendix C) AQ5: What about oil emissions from older 2-cycle ATVs? And accidents involving ATVs on trails in riparian areas?

*Response: The potential for this impact will be reduced as trails are removed from riparian areas. The potential for an oil leak as a result of an accident is remote. If this was to occur it would be cleaned up as directed in procedures outlined in hazardous material manuals. Also in general:*

*"All activities occurring on the Forest must be mitigated if necessary in order to meet state water quality standards as well as threshold sediment levels," (PSICC Forest Plan).*

*"Forest management activities in any wetland, riparian area, and flood plain, will be designed to prevent long and short-term adverse impacts, in accordance with Executive Orders 11988 and 11990, the direction outlined in Forest Service Manual, sections 2526, 2527, and 2633, and in Management Prescription 9A," (PSICC Forest Plan).*

## **Fire**

(55) This paragraph also talks about the need for temporary roads to conduct burning. What does this have to do with the project?

*Response: The EA states, "If any new roads are needed for planned burns, they will be analyzed as part of that individual project." Road access will be important as fuel loads increase and roads are needed to meet fire protection objectives.*

(55) How can there be no indirect effects to fire that are common to all alternatives? What about the potential for human-caused fires on roads and trails?

*Response: Human-caused fires on roads and trails are treated as direct effects in this analysis.*

(55) How many fire starts are related to recreational use?

*Response: From 1970 through 2004 approximately 33% of all fires were caused by humans on the South Platte Ranger District. Approximately 71% of these fires could be attributed to recreational use (mostly escaped campfires).*

(55) Under the discussion for Alternatives B and C, the effects are compared between Alternative B and Alternative C, but not Alternative A. How does Alternative A fit in?

*Response: As stated in the EA, Alternative A provides the least amount of motorized trails. Firefighter response time could be longer as compared with other alternatives as this alternative allows for the least access for firefighters. However, it also leaves the least area for human caused fire starts along travel ways.*

(61) Open fires are of additional concern. Recently an abandoned fire was found behind our community – still burning.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment.*

(92) Our concerns are: Open fires and smoking along these trails.

*Response: As stated in the EA (EA, page 2-14) elements not outlined in Chapter 1, are not included in an Alternative. These include, but are not limited to camping, fire, fees, winter use, hiking, non-motorized use and other recreation activities. These elements are outside the scope of this assessment.*

(55) In cumulative effects common to all alternatives, what is the risk of human-caused fires? How many fires occur in the project area every year? What proportion is human-caused? What about fire starts along trails compared with along roads?

*Response: The number of fires in the project area fluctuates from year to year. Approximately 33% of all fires on the South Platte Ranger District are human caused. The ID team does could not find any statistical data that differentiates the number of fires started along trail vs. the number started by roads.*

### **Noxious Weeds**

(55) The mitigation measures for noxious weeds are confusing and do not appear to really do anything. I suggest the following measures:

- All sites (roads, parking lots, trailheads, trails, etc.) should be surveyed for the presence of noxious weeds.
- Before ground disturbing activities are conducted (including routine maintenance), existing infestations of noxious weeds should be treated using appropriate methods (and appropriate timing) to minimize the risk of spreading weeds.
- Equipment should be cleaned before entering the project area. On-site washing is not recommended to avoid spreading weeds in dirt removed from equipment.

- Revegetation of disturbed areas should be done as soon as practicable after activities are completed. Only native, certified weed-free seed should be used. Any straw, mulch, fill dirt, or other materials should be certified weed-free.

*Response: The mitigation measures stated in the EA are consistent with your suggestions. Additionally, the mitigation measures stated in the EA are feasible for implementation and are consistent with Forest Service weed management practices (Forest Service Manual 2000 Series, Section 2080).*

(55) How are noxious weeds capable of affecting wildlife habitat at the landscape scale?

*Response: Noxious weed infestations have major impacts on ecosystems and ecological conditions that support wildlife. Noxious weeds directly reduce available, preferred forage; noxious weeds alter thermal and escape cover; noxious weeds can change water flow and availability to wildlife; noxious weeds may reduce territorial space necessary for wildlife survival. A recent study conducted in Montana showed that areas dominated by leafy spurge received three times less use by deer and four times less use by bison compared with similar uninfested areas. On native bunchgrass sites in Montana, dense spotted knapweed populations reduced available winter forage for elk by 50 to 90 percent. Elk use increased almost four times after dense spotted knapweed infestations were controlled on these sites (Sheley et. al. 2001; Howery and Ruyle 2002).*

(55) Would sufficient funding be available as part of this project to treat both current noxious weed problems and any new infestations?

*Response: There will never be sufficient funding to treat all noxious weeds in the project area. The South Platte Ranger District is currently treating infestations of high priority weed species in the project area and will treat new infestations as they are located. Grant monies will be requested as part of this project to supplement Forest Service funds for noxious weed control.*

(55) By BMPs, I assume the writer meant mitigation measures? Would these be used for Alternatives A and B as well?

*Response: Yes, however the Visitor's Center is unique to Alternative C. The ability to convey the BMPs to the public would be most improved through the Visitor's Center.*

(55) In the comparison of alternatives, the conclusion needs to be better supported. Table 3-11 makes Alternative A look like the best for vegetation (best net gain in vegetation). Or is this section incorrect?

*Response: As stated in the EA, on page 3-43, a comparison of Alternatives relating to general vegetation gains and losses is described in Table 3-11. Alternative A would result in the least clearing of vegetation since no new trails are constructed and it is assumed that the majority of the trail closures will remain in place. Alternative B will also result in a net gain in vegetation with closures being permanent. Alternative C*

would result in the largest increase in new trail and therefore vegetation loss, however it would include the permanent relocation of trails from sensitive riparian communities (see EA, Table 3-5).

(55) Yellow toadflax is not listed on page C-7. Which is correct?

*Response: Yellow toadflax is present in the project area. Yellow toadflax is mentioned on both pages, C-7 and C-11. Appendix C states, on page C-7, “Weedy species typically require soil surface disturbance to gain entry into an area. Populations of noxious weeds in the project area, including, diffuse knapweed (*Centaurea diffusa*), spotted knapweed (*Centaurea maculosa*), Canada thistle (*Cirsium arvense*), musk thistle (*Carduus nutans*), Russian thistle (*Salsola iberica*), **yellow toadflax (*Linaria vulgaris*)**, Dalmatian toadflax (*Linaria genistifolia* ssp. *dalmatica*), oxeye daisy (*Chrysanthemum leucanthemum*), scentless chamomile (*Matricaria maritima*) and leafy spurge (*Euphorbia esula*).”*

*Appendix C states, on page C-11, “The most common weeds seen in the project area are spotted knapweed, diffuse knapweed, **yellow toadflax** and Canada thistle.”*

### **Wildlife**

(55) How would Alternative A have beneficial effects on wildlife?

*Response: In Alternative A, 16 miles of MLI roads would be decommissioned and 11 miles of trail currently closed as a result of the Hayman fire and other resource considerations. Closed trails could be rehabilitated as funding is available. As these areas re-vegetate, there will be minor increases in the amount of available wildlife habitat.*

(55) What is the basis for the net change in various habitats?

*Response: The net change in various wildlife habitats is based on the proposed changes to the road and trail systems.*

(55) In the comparison of alternatives, what is the basis for saying Alternative C would improve more habitats?

*Response: In Alternative C, road and trail closures and new trail construction would result in a direct net loss of 4 acres of terrestrial wildlife habitat. Trail closures in the Bear Creek and Trout Creek areas would also create 3 large non-motorized areas covering over 8,000 acres. These non-motorized habitats would provide refuge for wildlife and connectivity to lands outside of the forest boundary, particularly for species with large home ranges such as mule deer, elk and black bear. This indirect improvement to wildlife habitat is the basis for determining that Alternative C would improve more wildlife habitat than the other alternatives.*

(55) What would happen if Mexican spotted owls (MSOs) are detected by surveys?

*Response: If a Mexican spotted owl is detected during surveys, trail modifications and consultation with the U.S. Fish and Wildlife Service will be required (BA pg 12).*

(55) What is the definition of MSO critical habitat and where is it located in the project area? Would there be any adverse modification of critical habitat?

*Response: The Federal Register (8-31-2004) defines Mexican spotted owl critical habitat as areas within the mapped boundaries that are protected or restricted and include one or more of the primary constituent elements. Primary constituent elements related to forest structure are further defined as:*

*1). A range of tree species, including mixed conifer, pine-oak, and riparian forest types, composed of different tree sizes reflecting different ages of trees, 30 to 45 percent of which are large trees with a trunk diameter of 12 inches or more when measured at 4.5 feet from the ground;*

*2) Shade canopy created by the tree branches covering 40 percent or more of the ground; and*

*3) Large dead trees (snags) with a trunk diameter of at least 12 inches when measured at 4.5 feet from the ground.*

*Primary constituent elements related to maintenance of adequate prey species:*

*1) High volumes of fallen trees and other woody debris;*

*2) A wide range of tree and plant species, including hardwoods; and*

*3) Adequate levels of residual plant cover to maintain fruits, seeds and allow plant regeneration.*

*In the Federal Register, the U.S. Fish and Wildlife Service recognizes that not all lands within the boundaries of the designation will contain the habitat components essential to the conservation of the species. A recent analysis of mature mixed-conifer stands on the Pike National Forest indicates that possibly 5% of the stands may meet the threshold conditions for restricted habitat in the draft revision of the Recovery Plan (Smith 2005 in BA pg 12). Fewer stands are likely to meet the more stringent threshold conditions in the current Recovery Plan (USFWS 1995). Habitat Structural Stages (HSS) are defined by the USFS. HSS 4C is defined as a mature stand of large to very large trees; most trees occur in a diameter range of 12-18 inches with an interlocking crown. HSS 5C is defined as an old growth stand of large to very large trees; most trees occur in a diameter range of 18-24 inches with an interlocking crown. HSS 4C or 5 have the most potential to provide critical habitat. There are approximately 13,500 acres of HSS 4C and 5 widely distributed in the project area. Approximately 9.8 miles (11.9 acres) of proposed new trails would cross 4C or 5 HSS areas. If these areas are found to meet the critical habitat criteria, the trail routes would be modified to avoid or minimize impacts. Vegetative structure would be maintained so that there would not be any adverse modification to critical habitat.*

(55) What would be done if sensitive species are found: buffers, timing, trail re-location, other actions? Without at least the conceptual measures, how can the effects be determined? What does the Biological Evaluation (BE) say?

*Response: If sensitive species are found during surveys, trail re-alignments would be used to avoid impacts to these species. Timing restrictions would also be considered for the peregrine falcon. The impacts of the project on Forest Service sensitive species identified in Table 3-8 were considered in the BE and trail re-alignments were the primary means of avoiding impacts to these species.*

(55) How much Preble's meadow jumping mouse habitat is there in the project area?

*Response: Based on our GIS analysis, there are approximately 18,700 acres of potential Preble's habitat in the project area.*

(86) Motorized Trails near Dakan Mtn Road - We encourage the Forest Service to implement a setback from the southern boundary of the area along Dakan Mtn Road. The area to the south of Dakan Mtn Road is an important refuge for a variety of wildlife. Trails paralleling Dakan Mtn Road, or in the nearby vicinity should be discouraged. Having a buffer between the zones is important for the protection of natural resources and wildlife in the non-motorized to the south of the motorized recreation area.

*Response: There are no plans to develop trails east of Dakan road. This includes the southern area including Bear Creek.*

(101) The intense noise terrorized the animals and birds and thus destroys many more acres.

*Response: The effects of noise are described on page 3-28 and on page 3-59 of the EA.*

(92) Our concerns are: Animal habitat – How will the noise and pollution affect wildlife and livestock already stressed by drought and recent fires.

*Response: We agree that noise affects many acres of wildlife habitat along each trail. The area within a 1,500' sound corridor along each side of all existing and proposed roads and trails is estimated to be the same in Alternatives A and C; Alternative B would affect approximately 2,000 fewer acres. The responses of wildlife to noise can vary extensively depending on the species, predictability of the activity, frequency and magnitude of the activity, timing (e.g. breeding season) and, relative location (e.g. above versus below, in the open versus screened by topography or vegetation). See Chapter 3, Affected Environment for more details or the Wildlife report.*

(92) Our concerns are: Endangered species, including plants, insects, birds, and animals.

*Response: Please see the Chapter 3, Affected Environment section on Terrestrial Wildlife (including Federally Listed, Sensitive, and Management Indicator Species).*

(55) Certainly larger areas are better for some species, but what about overall habitat loss?

*Response: Please see Table 3-10. Alternative A would result in a net increase of 38 acres of overall terrestrial habitat as a result of decommissioned roads. Alternative B would result in a net gain of 24 acres and Alternative C would result in a net loss of 4 acres as a result of new trail construction and road and trail closures. This decrease in the amount of available wildlife habitat in Alternative C would be substantially offset by consolidating the trail system and creating three large areas of non-motorized wildlife habitat.*

(55) What “sensitive habitat areas” would still be affected by existing trails? How would Alternative C improve this situation and why would Alternative B not improve it?

*Response: The area within the WIZ is considered to be sensitive habitat. Alternative A would retain over 12 miles of trail in the WIZ, in some cases including the primary channel. Alternatives B and C would each result in a decrease of over 12 miles of trails in the WIZ. Alternative B has trails located in the WIZ that are not located in the channel, but in some cases they parallel the riparian area for some distance. Alternative C primarily impacts the WIZ by perpendicular channel crossings with less distance running parallel to the riparian area resulting in less impact.*

(55) TW2: “Appendix M describes the effect of terrestrial habitats” On what? Which species can be adversely affected by human disturbance on their winter range? What about other times of the year? The third paragraph of this answer is actually a good start.

*Response: The sentence should read, “Appendix M describes the effect of the road system on terrestrial habitats.” Mule deer and elk can be adversely affected by human disturbance on their winter range, but disturbance during the winter months is generally reduced because access is limited due to snow and road closures, as indicated in TW4. TW2, 3 and 4 describe the effects of encroachment from activities at other times of the year, such as during courtship, breeding or nesting.*

(55) TW4: Which chapter of the EA is being referenced? It should be summarized here.

*Response: Chapter 3 (page 8-35) of the EA is being referenced.*

### **Soils**

(55) For the soils issue, both Alternatives B and C would increase the extent of trails (see Table 2-1). How would these alternatives reduce compaction? Wouldn't the new trails be compacted as well? This does not even appear to consider the compaction that would occur at the expanded parking lot locations under Alternative C.

*Response: Impacts from soil compaction from activities will be avoided due to trail location and design. Existing parking areas will be expanded to a small degree and will include appropriate measures to mitigate erosion impacts. All closed roads and trails will be rehabilitated, reducing any impacts due to compaction (45 miles of trails, 16 miles of roads.)*

(55) How can the cumulative effects of Alternative B and C be the same? The EA says Alternative C would reduce the overall sediment input in the watershed because of trail re-location. So wouldn't the cumulative effects be reduced?

*Response: Cumulative effects as it relates to soils are difficult to determine since a number of factors influence impacts. Sediment input is addressed in the direct and indirect impacts sections of Soils as well as in the Hydrology section of the document (EA, page EA 3-1)*

(55) How would paving lots in Alternative C affect sediment production?

*Response: With appropriate engineering and design (directed drainage), sediment production will be reduced.*

### **Roads and Roadless Areas**

(55) Inventoried roadless areas (IRAs) and the effects of the alternatives on IRAs and IRA values need to be analyzed in detail.

*Response: Unlike Wilderness Areas, Inventoried Roadless Areas do not exclude motorized uses. As described in the EA, no new roads are planned.*

(55) MA 2A has specific road density guidelines – are these currently being met and would they be met under each alternative? This should be introduced in Table 1-1.

*Response: None of the alternatives include new roads in MA 2A. This area does not prohibit motorized trails and road densities limitations do not apply to trails.*

(55) I believe IRAs should also be an issue analyzed in detail, if not a key issue. There are at least two large IRAs in the project area, and various project activities would take place in one of these IRAs. Yet there is no mention of IRAs in the entire document. Is the Forest Service trying to avoid dealing with the IRA issue simply because there is some question as to the applicability of the Roadless Rule?

*Response: Unlike Wilderness Areas, Inventoried Roadless Areas do not exclude motorized trail uses and therefore were not assessed. No new roads are planned in these areas.*

(55) In the footnotes to Table 3-11, trail/road decommissioning is listed. Chapter 2 does not discuss decommissioning of roads. Why are roads included in this table? Or is Chapter 2 incorrect?

*Response: The EA states, "All ML 1, non-system and unclassified roads on Forest Service Lands would be decommissioned. In addition, all non-designated trails will be closed and restored," (page 2-1). Regarding Alternative A, the EA states, "As illustrated in Map 2-1 and Table 2-1, the existing 16 miles of Maintenance Level (ML) 1 would be*

*decommissioned,” (page 2-1). The closure of roads was considered when assessing direct impacts to vegetation as noted in the text.*

(55) Why is there discussion of temporary roads? These are not part of any alternative, according the Chapter 2. Which is correct?

*Response: Temporary roads may be needed to meet access needs for National Forest management, forest protection, fuels reduction, or monitoring. Temporary Roads are roads authorized by contract, permit, lease, other written authorization, or emergency operation, not intended to be a part of the forest transportation system and not necessary for long-term resource management (36 CFR 212.1).*

(55) The indirect effects of Alternative A include discussion of increased uncontrolled access. Is this really likely to happen? Why would it not happen under Alternatives B and C?

*Response: Alternative A includes the continuation of present management in an area where visitation is increasing. Uncontrolled access would be likely to increase as a result of increased social trails, lack of trail system design, and/or trail degradation. Under Alternatives B and C, a better designed trail system would encourage visitors to stay on trail rather than creating networks of social trails.*

(65) Grade the road properly and consistently!

*Response: Road grading activities are not within the scope of the EA and are under a Schedule A agreement with Douglas County.*

(55) As I understand it, no changes are proposed to the road system. Why does the direct effects common to all alternatives section mention “few changes”? ... Prescribed burning is not discussed in Chapter 2. Are temporary roads and prescribed burning components of this project?

*Response: The EA states, “If any new roads are needed for planned burns, they will be analyzed as part of that individual project,” (page 3-26). Road access will be important as fuel loads increase and roads are needed to meet fire protection objectives.*

(55) How common is the problem of illegal firewood collection? Is this really why non-system roads appear?

*Response: Non-system roads are created for a variety of reasons, including the collection of wood, access to camping areas, obstacle avoidance and the creation of new recreational routes. No statistics have been gathered for this area on the reason why each informal user route was created. The USFS may decide to also create temporary roads for a specific activity lasting only a short period of time; roads are then to be returned to restored to previous condition.*

(55) What is the purpose of Table 3-20? It shows no changes to the road system under any alternative. Why waste space with this table? On the other hand, there are various mentions of potential future road closures under Alternative A. Are these reasonably foreseeable? Should they be shown in Table 3-20, included in the description of Alternative A in Chapter 2, and discussed as appropriate in the environmental consequences for other resources?

*Response: Table 3-20 restates that the road system so the reader does not have to return to Chapter 2. Road closures for Alternative A are already shown in Table 3-20 (see Maintenance Level 1/Re-vegetated Roads) as well as in the table in Chapter 2 (road closures are the same for each Alternative). These roads are considered in Chapter 3, but do not differ by Alternative.*

(55) Under the direct effects of Alternative C, are minor changes proposed in the road system or none at all?

*Response: Temporary roads may be necessary for specific projects, which could result in minor changes. If any new roads are needed they will be analyzed as part of that individual project.*

(55) Under the comparison of alternatives, my understanding is Alternative A would maintain the current system, not Alternative B. As discussed in Chapter 2, Alternative B would make many changes to the existing system (see Table 2-1). What is the basis for the discussion in this section?

*Response: The "Comparison of Alternatives" section on page 3-68 of the EA summarizes the differences between each Alternative. As stated, Alternative C would result in a formalized travel system with clearly designated roads and trails. Access would be improved with the increase in motorized trail mileage. Alternative B would maintain the experience of the current road and trail system, by providing the number of miles of motorized trails close to historic levels. Alternative A, may decrease accessibility, as motorized trails are closed (which may or may not be replaced), decreasing trail mileage.*

(55) The indirect effects of Alternative A include discussion of increased uncontrolled access. Is this really likely to happen? Why would it not happen under Alternatives B and C? If uncontrolled access is a function of lack of funding for enforcement and closure of unauthorized routes, how would Alternatives B and C solve this problem?

*Response: Alternative A includes the continuation of present management in an area where visitation is increasing. Uncontrolled access would be likely to increase as a result of increased social trails, lack of trail system design, and/or trail degradation. Under Alternatives B and C, a better designed trail system would encourage visitors to stay on trail rather than create networks of social trails.*

(55) EF1: Are any unroaded areas being proposed for roading? It certainly appears trails are proposed in IRAs for at least Alternative C.

*Response: No new roads are planned.*

(55) RR4: Are there any maintenance level 5 roads in the analysis area? ML 5 roads are regularly mentioned, but there appear to be none in the analysis area.

*Response: As shown in Table 2-1 and Maps 2-1 to 2-3, there are no ML 5 roads in the project area.*

(55) Why are temporary roads discussed?

*Response: Temporary roads may be needed to meet access needs for National Forest management, forest protection, fuels reduction, or monitoring. Temporary Roads are roads authorized by contract, permit, lease, other written authorization, or emergency operation, not intended to be a part of the forest transportation system and not necessary for long-term resource management (36 CFR 212.1).*

(55) Appendix N: State Highway 67 is listed as ML 5. This is the only place in the roads analysis that an ML 5 road is listed. In Appendices G and H, SH 67 is listed as ML 3, 4. Which is correct?

*Response: As shown in Table 2-1 and Maps 2-1 to 2-3, State Highway 67 is ML 3 and 4. The ML in Appendix N for State Highway 67 of ML 5 should be ML 3 and 4.*

(55) (Page C-25) GT1: Page C-7 says FSR 300 is the primary access. Which is correct?

*Response: Primary access to the RRMRA is provided from Highways 67 and 97. Rampart Range road (FSR 300) is the primary access through the RRMRA.*

## **Vegetation**

(55) How would the project directly affect vegetation?

*Response: Please see pages 3-28 to 3-48 of the EA. In addition the Wildlife Report and Biological Assessment addresses vegetation as it relates to key wildlife species.*

(55) Why is ponderosa pine the only habitat type mentioned in the cumulative effects common to all alternatives? What about Douglas-fir? Aspen? Shrublands?

*Response: This information is to provide the reader context. A discussion relating to vegetation is found in the EA on page 3-43.*

(55) Another direct effect to vegetation would be restoration on closed trails – why is this not mentioned?

*Response: Restoration of vegetation on closed roads and trails is specifically addressed in the Affected Environment section as follows:*

- *Effects Common to All Alternatives (page 3-43), “Positive gains in vegetation are due to road and trail restoration.”*
- *Table 3-11, Area (acres) of Impact to Plant Communities (page 3-44), “[Positive] net gain of vegetation due to trail construction and trail/road decommissioning.”*
- *Alternative A, Direct Effects (page 3-44) “Though land would be restored in this alternative, existing trails may still impact sensitive habitat areas.”*
- *Alternative B, Direct Effects: “Areas that are closed will be restored and revegetated with native species.”*
- *Alternative C, Direct Effects: “Areas that are closed will be restored and revegetated with native species.”*

(55) In the comparison of alternatives, the conclusion needs to be better supported. Table 3-11 makes Alternative A look like the best for vegetation (best net gain in vegetation). Or is this section incorrect?

*Response: As stated in the EA, on page 3-43, a comparison of Alternatives relating to general vegetation gains and losses is described in Table 3-11. Alternative A would result in the least clearing of vegetation since no new trails are constructed and it is assumed that the majority of the trail closures will remain in place. Alternative B will also result in a net gain in vegetation with closures being permanent. Alternative C would result in the largest increase in new trail and therefore vegetation loss, however it would include the permanent relocation of trails from sensitive riparian communities (see EA, Table 3-5).*

### **Heritage Resources**

(55) Would Alternatives B and C reduce effects to heritage sites? Would they create new effects because of trail construction? How does this compare to the existing situation?

*Response: There are no unique characteristics of the geographical area that will be significantly affected by the Alternatives. Historic or cultural resources will not be affected because sites will be avoided and mitigation measures (EA, see Chapter 2) will be implemented to ensure that any eligible or potentially eligible heritage sites are not disturbed. As stated in the EA, there is an increased potential for minor impacts to unidentified historic and cultural resources in Alternative A.*

*Both Alternatives B and C would reduce effects to Heritage Resources, 2.12, 3. Heritage; 3-18, 4. Heritage Resources, a. Affected Environment, paragraph four; 3-20 (3) Alternative B, (a) Direct Effects; 3-20 (4) Alternative C – Proposed Action (a) Direct Effects; and C-36, CH3, paragraph three, Trail / road construction / decommissioning, have the potential to affect Heritage Resources and mitigated through the heritage resource process, 2.12, 3. Heritage; 3-18, 4. Heritage Resources, a. Affected Environment, paragraph four; 3-20 (3) Alternative B, (a) Direct Effects; 3-20 (4) Alternative C – Proposed Action (a) Direct Effects; and C-36, CH3, paragraph three,*

*apply. The existing conditions consist of roads and trails that were grand fathered into the system without NEPA or Heritage Resources being taken into account, 3.19, b. Environmental Effects, (1) Effects Common to All Alternatives, (a) Direct Effects, (b) Indirect Effects, and (c) Cumulative Effects.*

(55) This entire section provides no clear idea of what the effects (including cumulative) to heritage resources might be. Are there any known sites being affected by trails and roads in the project area? How would the alternatives change the current situation?

*Response: 2.12, 3. Heritage, Prior to constructing, rerouting or decommissioning a road or trail, an archeological survey will be conducted to identify historic and prehistoric sites and evaluate them according to the National Historic Preservation Act. If heritage resources are discovered during project implementation, all operations must cease within a 100-foot radius of the site location. Any heritage resources located would be protected based on the recommendations of the forest archeologist and the Colorado State Historic Preservation Officer; 3-18, 4. Heritage Resources, a. Affected Environment discusses previous Heritage Resource Survey, Known historic and prehistoric sites, and Forest Plan guidelines as directed by NEPA and NHPA; 3-19; 3-20; 3-21. Alternatives B / C would be different than Alternative A (current situation) C-34 Q. Culture And Heritage, CH(1); C-35, CH(1) / CH(3); C-36, CH(3); and C-51 / C-52, Heritage Risk. Also please see above response.*

(102) I have reviewed your letter regarding the plan listed above, at this time; the Southern Ute Indian Tribe requires an Archaeology report for the proposed area for the plan listed above, before making any further comments.

*Response: Please see above response in regards to additional Archaeology studies.*

(55) CH1: Is this the same as SI3, for which a completely different answer is given? And is CH3 the same as well? How many, if any, of the identified cultural properties have been affected by roads and trails?

*Response: All three answers are correct and applicable. Please note the questions are different and therefore the answers provide the reader with some new information without being too repetitive. CH (1) answers how many cultural resources are present in the project area and CH(3) directly answers how many cultural properties have been affected by roads and trails. However, the response describes how a number is not known, since the Rampart Roads area was developed prior to the establishment of NEPA and the NHPA.*

(104) Page 2-12, first bullet under 3. Heritage: We recommend that in addition to an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards that a professional meeting those standards with experience in dealing with historic resources is part of the survey team. Please remember that roads and trails may also be eligible for listing on the National Register of Historic Places and should be evaluated.

*Response: In addition to an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards, a professional meeting those standards with experience in dealing with historic resources will be part of the survey team.*

(104) Page 3-18, last paragraph: In addition to Section 106 of the National Historic Preservation Act that sets forth compliance requirements you should also review Sections 110 and 111 and their interpreting regulations that deal with federal agency identification, evaluation and stewardship requirements for historic properties in their possession or control.

*Response: These sections were reviewed. No change, but comment noted.*

(104) Page 3-19, first paragraph. The current regulations implementing Section 106 make no distinction between Certified Local Governments and other local governments as consulting parties.

*Response: No change, but comment noted.*

## **Recreation**

(55) Why does this section discuss the Pikes Peak District?

*Response: The EA should state, "South Platte and the adjacent Pikes Peak Range District....."*

(55) Based on Table 3-12, it appears that Alternative B would slightly increase the extent of existing ATV trails, while Alternative C would have a dramatic increase, in conflict with the paragraph above. Which is correct?

*Response: The table is correct. As described in Chapter 2, existing single track is reclassified as ATV trail. Therefore, in Table 3-12 the amount of ATV (includes historical existing single track) trail is increased and the amount of existing single track is zeroed. The amount of existing trail suited for ATV use would decrease due to closures, however ATV uses would be permitted to access historical single track trail.*

(55) In Table 3-13, I assume "Zone" refers to MA? Table 3-13 shows a MA 3A. This MA has not been mentioned elsewhere. Does it occur in the project area or not? It is also discussed in the direct effects for Alternatives B and C. Is the rest of the document in error or just this section? This table also shows no difference between Alternatives B and C. Surely there must be some differences between these alternatives that can be shown in the table. If not, why include the table in the EA?

*Response: Yes, "Zone" refers to MA. MA 3A is immediately adjacent to the study area. No motorized trails or trail connections are planned for this area. This was important for the "Recreation Section," since this is one of the few areas managed for semi-primitive non-motorized recreation. In this case, no table was provided since a key factor is whether motorized trails were located in areas prohibited by the Forest Plan, which is not the case as illustrated by the Table. The text also describes key differences.*

The following table also provides additional information on the differences between Alternatives B and C:

MOTORIZED CLASS	MANAGEMENT ZONES					
	Zone 2A	Zone 2B	Zone 3A	Zone 4B	Zone 7A	Zone 7D
Alternative B Total Trails (miles)	17.0	41.4	0.0	3.1	23.1	40.1
Alternative C Total Trails (miles)	22.5	56.0	0.0	3.6	19.1	48.2

(55)PV1: Where has this been incorporated into the SI answers?

*Response: The response to this question is found throughout the EA, specifically beginning on page 3-28 and within AQ and TW responses of the Roads Analysis. The response is also found in SI (2).*

(55)PV4: Where has this been incorporated into the SI answers?

*The response to this question is found throughout the EA, specifically beginning on page 3-48 and within UR and RR responses of the Roads Analysis. The response is also found in SI (2).*

**Land Use**

(55) The direct effects common to all alternatives section states that Alternatives B and C are consistent with Forest Plan MA guidance. Does this include all Forest Plan MA direction? Would Alternative A be consistent with Forest Plan direction?

*Response: The ID Team considered Forest Plan goals, Management Area direction and operation and safety concerns. In general, Alternative A conflicts with a number of goals in the Forest Plan, such as the protection of watersheds, wetlands and riparian areas since trails remain directly in or along drainages. In several locations, Alternative A conflicts with management area direction such as described in 9A management areas.*

(55) How can trespassing occur on public lands?

*Response: “Trespassing on public lands” as discussed on page 3-59 refers to abuses of the public lands such as: riding cross-country (not on designated trails), creating or perpetuating social trails and spider-web trail networks, engaging in any other activities that may contribute to resource damage, or infringing on the rights of nearby private landowners. Also building structures on Forest Service lands with out a permit is trespassing.*

**Noise**

(55) What does the cumulative effects common to all alternatives discussion have to do with noise? What “park” is being discussed in the direct effects of Alternative A?

*Response: The cumulative effects discussion refers to noise and land use conflicts that will continue as more land is developed and these land uses, particularly residential uses, are placed closer to the recreation area. This is a common issue regardless of the alternative due to the increasing use of OHVs in the recreation area and the need for more developed land for human use in the surrounding communities. The term “park” refers to the Rampart Range Motorized Recreation Area.*

(61) Although these noise sources are some distance away, we live in a valley and the proposed OHV trail (#676), (Alternative C), rings the ridge directly above us. There is little if any attenuation to the sound as it is broadcast throughout the valley. In fact it echoes within the valley. Your report talks about single point noise sources, but OHV users never travel alone – they are always in groups which creates multiple point sources.

*Response: The noise analysis used soft site characteristics, as there were no hard surfaces, such as parking lots, adjacent to trails for noise propagation, but did not use, or quantify, attenuation associated with intervening terrain features, i.e., noise levels were modeled without assuming any attenuation from forested land or terrain, such as hills. Noise level increases, or decreases, were based on the relative location of the trails from their current location to their proposed location under each alternative.*

*The noise analysis did not identify OHV trails, or OHV users, as point sources. The reference to point and line sources is included to provide a reader with an understanding of noise terminology. In fact, the only point source identified in the analysis was construction equipment, and that was only identified for a common frame of reference. The OHVs were modeled assuming line source propagation over soft terrain. If a hard site were assumed, the relative noise level increase would be 3 dBA as opposed to the 4 dBA increase reported in the noise analysis. This would be due to the fact that the noise from an OHV would attenuate less over a hard site at a greater distance than over a soft site. Thus, the analysis included in the EA is a conservative assessment.*

(61) In addition, the new trail 676 which you propose (Alternative C) comes close to our community at three different points. The old trail was close at only one point. With these three points and a moving “line source” rather than a single point as your report implies, the sound pressure level will be considerably higher and longer lasting.

*Response: Two trails, both 678 and 679 will remain closed (over 7 miles) near Rainbow Falls North. These trails were located both to the north and south of Rainbow Falls North. This will offset noise from the new proposed trail located to the northeast. Trails in this location are permitted according to the Forest Plan.*

(88) In the realignment of trail 674, by bringing it closer to the residents of Pine Hills will cause a lot more noise.

*Response: The noise analysis assessed the increased noise from the realignment of Trail 674, from approximately 500 feet from Pine Hills to approximately 250 feet from Pine Hills, and indicated that noise from the trail would increase by approximately 4 dBA*

*which would be noticeable, but not a significant increase. Trails in this location are permitted according to the Forest Plan.*

(91) We believe that the route chosen to realign trail 674 to within 500 feet of residences will cause significant noise impact.

*Response: The noise analysis assessed the increased noise from the realignment of Trail 674, from approximately 500 feet from Pine Hills to approximately 250 feet from Pine Hills, and indicated that noise from the trail would increase by approximately 4 dBA which would be noticeable, but not a significant increase. Trails in this location are permitted according to the Forest Plan.*

### **Social and Economic**

(55) ... this section says Alternative A may decrease visitation. How could this happen and how likely is it really?

*Response: Management under Alternative A would not respond to the increases in visitation and the associated trail system demands. Degradation of existing trails, continued closures, lack of signage, and increased user conflicts as a result of inadequate management may eventually cause a drop-off in visitation as visitors choose other places to recreate. This may result in an increase in visitation in other locations of the Forest. This trend is visible during seasonal closures of different parts of the Forest. It is also possible that the use would continue to increase under all alternatives, but it would probably increase more in some alternatives than others.*

(55) In addition, how does the maintenance cost reduction compare with the cost of implementing the alternatives? How long would it take to pay back the investment in the improved trail system with the maintenance savings?

*Over time, the cost of maintenance will exceed the initial construction costs. It is difficult to estimate the total maintenance cost for trail maintenance since trail construction will be phased over a number of years depending on funding, completed to different design standards, receive different levels of use and be constructed in different conditions. Maintenance costs for trails can vary from less than \$500 per mile to several thousand dollars per mile annually, depending on the type of trail. Another factor is that many local OHV clubs are involved in the maintenance and upkeep of these roads and trails through grant agreements such as with the Colorado State Parks OHV Fund and partnerships with the US Forest Service. Any future collaboration, partnerships or contributions from volunteer groups could offset some costs. There are several successful partnerships with road and trail user groups, but it would be difficult to include non-binding agreements in this analysis.*

(55) What would be the cumulative effects of the alternatives on road and trail maintenance budgets and priorities Forest-wide?

*Response: With the continued closure or reconstruction of problem roads and trails and the construction of new trails according to design standards, the per unit maintenance*

*cost will go down. In addition, the closure of informal trails and roads will also decrease the overall road and trail network. The Forest Service has little control over the total budget provided by Congress, or the levels of funding provided within each program area. Each ranger district and forest will apply their funds as efficiently as possible to repair and maintain the road and trail system. The USFS will continue to prioritize funding and seek support of volunteers at levels necessary to maintain a high recreational experience.*

(55)The economic analysis needs to be revised to consider the full range of costs and benefits associated with each alternative, including non-priced values.

*Response: The analysis is not intended to be a comprehensive analysis that incorporates a monetary expression of all known market and non-market costs. Many of the values associated with natural resource management are best handled apart from, but in conjunction with costs. These effects related to natural resources are discussed throughout Chapter 3 of the EA, the BA/BE and in the Roads Analysis.*

**APPENDIX B  
List of Commenters**

**Decision Notice and  
Finding Of No Significant Impact (FONSI)**

**RAMPART RANGE RECREATION AREA  
MOTORIZED ROADS AND TRAILS PLAN**

Appendix B Rampart Range Recreation Area Motorized Roads and Trails Plan EA list the commenter name and the corresponding reference number.

**COMMENTER**

<b>NUMBER</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
1.	Skip	Schweiss
2.	Adam	Maxwell
3.	Ken and Jen	Murphy
4.	Gordon	Moench
5.	Kyle	Maersk Moller
6.	Joe	O'Malley
7.	Kent	Sundgren
8.	Mark	Hineman
9.	Doug	Alford
10.	Dean	Unknown
11.	Tyler	Cole
12.	Rick	Field
13.	Mike	Coddington
14.	Rick	Bersagel
15.	Gregory	Adams
16.	Jack	Cussins
17.	Patty	Collins
18.	Matt	Ralston
19.	Brett	Collins
20.	Kathy	McCracken
21.	Mile	Nelson
22.	Rob	Pettyjohn
23.	Steve	York
24.	Robert	Parks
25.	Don	Unknown
26.	Lars	Hansen
27.	Bill and Carol	Meyer
28.	Dennis	Larratt
29.	Jason	Trow
30.	Douglas County Public Works	
31.	Monica	Stevens
32.	Lindsay	Hickel

33.	Kevin	Witt
34.	Bradley	Foster
35.	Tom	Dillon
36.	Seth	Rankin
37.	John	Bongiovanni
38.	Robert	Fleck
39.	John and Diane	Vreeland
40.	Mike	Wolfer
41.	Jerry	Pfannenstiel
42.	Jim	Peasley
43.	Wayne	Dunn
44.	Jim	Maucker
45.	Chuck	Caulson
46.	William	Saluta
47.	William	Vickery
48.	Stephanie	Saluta
49.	Bradley	Smith
50.	Jon	Mills
51.	Garth	Butler
52.	David	Grau
53.	Brandon	Hargrave
54.	Steve	Speidel
55.	Matt	Shaw
56.	Mark	Turi
57.	Michael	Rich
58.	John	Adams
59.	Gregg	Cassarini
60.	Laurie	DiNatale
61.	Howard	Hinshaw
62.	Lori	Mahagan
63.	Grover	Cleveland
64.	Alex	Horne
65.	Christopher	Hayward
66.	Michael	Cussins
67.	David	Labosky
68.	Jason	Arndt
69.	Mike	Coulter
70.	Paul	Moley
71.	Richard	Sarchet
72.	John	Farrara
73.	Pat	Horkan
74.	Andy	Gumpper
75.	John	Knepp
76.	Tom	Dragovich
77.	Ronnie	Franks
78.	Bob	Rotert
79.	Jason	Staad
80.	Dan	Wickersham
81.	Brian	Alexander
82.	Richard	Trow
83.	Crystal	Varney

84.	David	Hughes
85.	Doug	Morton
86.	CMC	
87.	Matt	Stevens
88.	Shirley	Cook
89.	Randall	Fabrizio
90.	Linn	Churchill
91.	Andy	Wiedeman
92.	Janis	Cummer
93.	David	Gossett
94.	Christine	Kuenny
95.	Gregory and Eleanor	Lindin
96.	Kent	Sundgren
97.	Paul	Weis
98.	Patricia	Wing
99.	Patricia	Wing
100.	George	Peterson
101.	Charlotte	Briber
102.	Harold	Gibson
103.	Neil	Cloud
104.	Dan	Corson