



COLORADO

**Department of
Natural Resources**

Executive Director's Office
1313 Sherman Street, Room 718
Denver, CO 80203

November 23, 2022

Russ Bacon, Supervisor
Medicine Bow-Routt National Forests
c/o Brendan Kelly, Project Lead
925 Weiss Avenue
Steamboat Springs, CO 80487

RE: Mad Rabbit Trails Project Draft Environmental Assessment

Dear Supervisor Bacon,

On behalf of the state of Colorado, the Department of Natural Resources (DNR) and Division of Parks and Wildlife (CPW) respectfully submit the following comments for your consideration regarding the Draft Environmental Assessment for the Mad Rabbit Trails Project (Draft EA). We have truly valued the opportunity to work closely with the Forest Service throughout this decision process in our capacities as cooperating agencies, and look forward to our continued collaboration in developing a final plan. The Forest Service is an essential partner in stewarding wildlife, ecological, economic, cultural and recreational values in the Routt National Forest (RNF).

There can be no dispute that Steamboat Springs and Routt County have transformed dramatically in the quarter century since the 1998 revision of the Routt National Forest Management Plan (1998 Forest Plan). Routt County continues to serve as a winter sports “mecca” and regularly tops the list of backcountry and big game hunting destinations in the state. But summer recreation has occupied an increasing share of national visitation, and is on-par with these other outdoor recreation industries as a driver of the local economy.¹

The Draft EA's Purpose and Need for Action indicates that non-motorized trail-based activities, in particular, are straining limited amenities and infrastructure, and have introduced new and more frequent conflicts with other national forest uses and values than were anticipated in the 1998 Forest Plan.² In our observation, this challenge has grown even more acute since the public scoping period for the current decision in 2019, in large part because of the astronomical leap in demand for outdoor visitation during the coronavirus pandemic.

¹ Colorado Parks and Wildlife, 2019 Colorado Statewide Outdoor Recreation Plan, App. F: Economic Drivers of Outdoor Recreation, 141. <https://cpw.state.co.us/Documents/Trails/SCORP/Final-Plan/2019-SCORP-Report.pdf>

² U.S. Forest Service Mad Rabbit Draft Environmental Assessment, 4.

The proposed Mad Rabbit Trails Project EA is the latest in a series of U.S. Forest Service decisions that aim to diversify sustainable recreational experiences and address recent and future outdoor recreation growth in the Steamboat Springs vicinity, and would be the second to implement projects prioritized in a 2015 Steamboat Springs Trails Alliance Proposal to steer the expenditure of local 2A accommodation tax funds. The Proposed Action would add 52 new trail miles (reduced from just under 80 in the 2019 preliminary proposal) to the trail system on surrounding NFS lands, a majority of which respond to requests for “epic loop” and “gravity-fed downhill mountain bike park” experiences in the Buffalo Pass and Rabbit Ears Pass trail networks. In addition, it proposes to expand visitor facilities and access points by adding new five trailheads off of U.S. Highway 40.³

The project has the potential to set a precedent for future trail development in our state, in that a significant portion of the proposed new trail segments overlap with sensitive elk production areas mapped by CPW as high priority habitat (HPH), and nearly all are located within the boundary of a designated Colorado Roadless Area (CRA). Given these sensitivities, and the project’s significance to the local community, it is commendable that the Forest Service has gone to great effort to solicit input from the public, the City, and state agency partners, including DNR and CPW.

The Terrestrial Evaluation and Wildlife Specialist Report considers the best available scientific information and accurately accounts for recent animal collaring data provided by CPW in its presentation of well-substantiated conclusions. Additionally, we appreciate that the Forest Service has taken much of the state’s feedback into consideration in the current proposal. The Proposed Action incorporates several meaningful modifications from the 2018 and 2019 preliminary drafts that respond to our recommendations for minimizing adverse impacts to sensitive wildlife species and habitat, and to protected CRA and associated Roadless characteristics. Among these changes are proposals to:

- Rehabilitate 36 miles of non-system trails and eliminate previously-proposed new trails within the Mad Creek/Rocky Peak area, reducing impacts to sensitive big game winter range habitat;
- Eliminate previously-proposed trails between Steamboat Resort and U.S. Highway 40
- Cluster trails in proximity to existing disturbance along Highway 40 to minimize habitat and landscape fragmentation within the Long Peak CRA;
- Eliminate several trails in the Ferndale Mountain mountain bike park area (Ferndale) to reduce trail density within elk production/calving habitat;
- Recommend seasonal timing restrictions on some trails overlapping sensitive elk production and calving habitat within the Ferndale mountain bike park area.

³ *Steamboat Springs Trails Alliance: Request for Proposal for Use of Steamboat Springs Accommodation Tax*, <https://www.steamboatsprings.net/598/2A-Trails-Committee>



I. Outstanding Programmatic Considerations and Recommendations

In consideration of the extensive public input and significant investments of time and resources that have gone into the development of the Draft EA, DNR and CPW have opted not to propose significant adjustments to design criteria or configuration of trails and amenities reflected in the Proposed Action. Instead, we provide input that we hope will be constructive in clarifying analysis, and strengthening management measures and mitigation strategies based on the proposed project design with the goals of enhancing and improving assurances for “sustainable recreation” management outcomes, including sensitive wildlife and other biological resource conditions; recreation class settings; and public safety.

Much of our feedback is carried over from or builds upon previous input CPW and DNR have provided in cooperating agency discussions and public comments. We have attempted to organize our input and minimize redundancy, but we note that not every consideration we address corresponds directly to a discrete recommendation or request as we found there to be a considerable amount of categorical overlap (e.g., among Roadless and biological values; ROS class and HPH recommendations, etc.) Additionally, we wish to caveat that some of the potential solutions we present remain conceptual or preliminary, pending additional information, input or other contingencies. We welcome the opportunity to work with the Forest Service and community partners to further develop any ideas that hold potential for enhancing a final plan. *(Also see Appendix A: Design Element Suggestions)*

Landscape-Level Planning

DNR and CPW are encouraged that there are promising available pathways for mitigating uncertainties and offsetting unavoidable impacts to management outcomes in a final plan. At the same time, we continue to assert that there is also a strong case to be made for pursuing a more holistic, landscape-level environmental analysis to take stock of the outdoor recreation outlook in the wider Routt National Forest, and evaluate potential cumulative effects to wildlife and related biological conditions, alignment with Shared Stewardship principles.

This is necessary because implementation-level planning tools such as the current environmental assessment impose arbitrary limitations on analyses, and are tethered to previous decisions that sometimes distort the accuracy of findings. With respect to the current process, we have flagged our concern that the Terrestrial Evaluation is restricted to applying outdated methodologies for assessing habitat effectiveness and other indicators that were approved in the 1998 Forest Plan, even though more accurate recent models are presented.⁴

A more expansive environmental impact statement would be better equipped to illuminate unforeseen possibilities for steering development away from areas of high biological and

⁴ MRTTP Draft EA, Terrestrial Evaluation and Wildlife Specialist Report, 15.



resources value, and avoiding conflict with other uses. (Not to mention, would account for changes in recreational use and visitation that were unforeseen in the 1998 Forest Plan.)

Routt Recreation and Conservation Roundtable Regional Plan

Despite our reservations about the planning approach, we commend the Forest Service for endeavoring to respond to local community needs. Going forward, we also encourage the Forest Service to consider the outcomes of an ongoing planning process spearheaded by the multi-stakeholder Routt Recreation and Conservation Roundtable, with funding from CPW's Outdoor Regional Partnerships Initiative. The forthcoming regional recreation and conservation plan will provide constructive insights into local preferences and priorities, and offer recommendations for steering recreation toward areas of low environmental conflict, while the highest value wildlife habitat, ecosystems, and ecological services across Routt County, including on NFS lands, to inform future land use and natural resource management decisions.

Colorado Roadless Areas

CRA Effects Analysis

We respectfully request that the Forest Service elaborate on the framework applied in evaluating impacts to Colorado Roadless Area values. The Draft EA offers a high-level discussion of potential effects to individual protected Roadless characteristics across the project area, but offers little explanation as to the criteria or assumptions that were considered. It would be helpful to have a better understanding about how the evidence was weighed in concluding that the Proposed Action would result in “stable or improving” conditions for CRAs and Roadless characteristics. For instance:

- What is the rationale for applying only project-scale parameters in the analysis, as opposed to a CRA scale, or more granular lens? What are the limitations?
- What criteria were used in evaluating comparative effects among different Roadless characteristics? (e.g., Higher value assigned to “biological diversity,” vs. “primitive recreation” in some circumstances?)
- What criteria were used to assess the comparative merits or disadvantages of particular strategies or design elements? (e.g., trail miles decommissioned vs. trail miles constructed)
- Does the analysis consider “undeveloped character” of CRAs differently from the “sum” of individual protected Roadless characteristics?



Recreation Management

Of the project features retained in the Proposed Action, it is our view that proposed expansion of the trail network and visitor facilities in the Ferndale vicinity warrant special consideration and decision-making transparency because of their potential to set a precedent for future trail development projects in our state, in addition to their prominence in the current proposal. Not only would the proposed “gravity driven downhill mountain bike park” be the first of its kind to be constructed within the boundary of a CRA since the 2012 promulgation of the Colorado Roadless Rule, but it would also be among the highest density trail networks to overlap with mapped wildlife High Priority Habitat (HPH), in this this case, elk production habitat.

While the Colorado Roadless Rule (36 CFR 294) does not restrict trail development *per se* within CRAs, it does provide safeguards for retaining their “undeveloped character” (294.45), including semi-primitive and primitive recreational settings and opportunities, among other Roadless characteristics (294.41). Recreational Opportunity Spectrum (ROS) criteria adopted under the 2012 Planning Rule (36 CFR 291) indicates that “low to moderate” social settings, described as roughly 6-15 encounters per day, are appropriate for “semi-primitive” class attributes, compared with less than 6 encounters per day in primitive settings.⁵ (The 1998 Forest Plan describes semi-primitive non-motorized and primitive as fewer than 2 and 4 counters per day, respectively, on 80% of the days during summer and fall seasons.)⁶

It is difficult to ascertain exactly how trail construction and future use would affect Roadless values *within* the Long Park CRA, as the findings in the effects analysis are aggregated across CRAs within the project area. Presumably, the findings take into account the effects of non-system trail rehabilitation activities in the Mad Rabbit CRA, but the specific assumptions and parameters applied in the analysis are not disclosed. (See “Enforcing Existing Management Direction” and “Sustainable Recreation Management,” below). Absent site-specific analysis, it is not clear whether the localized impacts to desired conditions were taken into consideration, such as whether the decisions to concentrate trails and expand access along U.S. Highway 40 could lead to visitor use in excess of ROS class settings, or otherwise contribute to creating a “sacrificial developed edge zone” inside the boundary of a CRA?

We advise that guidance for monitoring, evaluating and enforcing ROS class attributes and other protected Roadless characteristics be developed as part of an adaptive sustainable recreation plan, to ensure that desired conditions are maintained or enhanced throughout the Long Park CRA. (See “Sustainable Recreation Management,” below.)

⁵ USDA ROS Primer and Field Guide, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb53353339.pdf;

⁶ 1998 Routt-Medicine Bow National Forest Land and Resource Management Plan, Ch. 2: Management Area Prescriptions



High Priority Habitat Guidance

We appreciate that the Forest Service has given thoughtful consideration to High Priority Habitat (HPH) recommendations and related wildlife values in the Draft EA. Formalized in 2021, CPW's HPH policy provides species-specific guidance for avoiding, minimizing, and mitigating adverse impacts to wildlife from human development and activity within sensitive seasonal and migration habitat.⁷ The Proposed Action adopts design criteria and management provisions to avoid and minimize potential impacts to HPH, including elk winter range, production areas, migration corridors and summer concentration areas within the project area. While big game species have always been a wildlife management priority for CPW, Governor Polis provided additional direction to state agencies to prioritize conservation of sensitive big game habitat and movement corridors, under Executive Order 2019 D-011. Of primary outstanding concern is the potential for future trail use in the dense Ferndale network within elk production HPH to contribute to unmitigated habitat fragmentation and compression.

We ask that additional opportunities to strengthen existing monitoring, management and mitigation measures, consistent with HPH recommendations, be thoroughly evaluated.

- *Disturbance Buffers* - In general, DNR and CPW have been supportive of the design objective to concentrate higher density trails along the existing U.S. Highway 40 disturbance corridor in order to minimize fragmentation and retain undeveloped large landscape habitat characteristics in the interior of the Long Park CRA.

However, we recommend that the effects analysis be revised to account for a ½ mile disturbance buffer distance, as opposed to the one-mile distance applied in the Proposed Action. (CPW agreed to a compromise distance in excess of the ¼ HPH guidance, provided that unavoidable effects offset by offsite mitigation.)

- A preliminary analysis suggests that roughly 9 miles of new trails proposed in the Ferndale network appear to fall within ½ mile of the existing corridor, including parts of segments 19, 20, 21, 22 and 30.
- *Seasonal Closure Area* - The Terrestrial Evaluation indicates that recreational activity within elk production area during calving season may have adverse effects to animal recruitment (calf:cow recruitment) and contribute to habitat compression. (TE, 41) The Draft EA indicates that the proposed mandatory seasonal closure for elk calving grounds “per Colorado Parks and Wildlife request” complies with Forest Plan direction under Threatened, Endangered Species, Standard 1.

⁷ CPW Recommendations to Impacts to Wildlife from Land Use Development in Colorado, https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf



We can confirm that the mandatory May 15-June 30 timing limitation accurately reflects HPH guidance (trail segments 23, 24, 25 and 27) for minimizing disruption to calving activity in the portion of HPH covered by the seasonal closure area. However, we wish to clarify CPW's request that the seasonal closure boundary encompass additional trail segments overlapping with elk production HPH; as proposed, a majority of trail segments in the Ferndale overlapping HPH fall outside of the seasonal closure area.

- Animal collaring data from 2020-2021 demonstrates high occurrence near all or part of trail segments 14, 19, 20, 21, 22, and 30, however, CPW also recommends that the closure area be extended to the “donut” strip between the two current mapped HPH polygons. We recognize that topographical and other conditions could make it enforce a use prohibition throughout the proposed HPH.
- If feasible solutions for expanding the seasonal closure area are not available, HPH guidance recommends offsite mitigation to offset unavoidable impacts from recreational trail use.
- Additionally, we recommend that protocols (e.g., 3-year cadence) and criteria for periodic review of wildlife data be adopted, to inform decisions about potential adjustments, such closure area or use restriction modifications, enforcement activities, etc. that may be appropriate for maintaining sustainable recreation desired conditions. (See Sustainable Recreation Management, below.)
- *Trail Density* - HPH guidance recommends that route (trail and road) density remain below the threshold of one linear mile per square mile within sensitive elk habitat to minimize disturbance. The Terrestrial Evaluation acknowledges that increased activity on recreational trails may have direct adverse effects on animal health and behavior, and can contribute to habitat compression and fragmentation, reduced access to forage, and other long-term effects to elk populations. (Terrestrial Evaluation, 43)

Per existing Forest Plan direction, the Draft EA estimates route density at the Management Area scale and excludes recreational trails from the analysis, so it is not possible to evaluate adverse effects with precision. A preliminary analysis suggests that all new trail segments in the Ferndale network within elk production HPH exceed the recommended route density threshold, when considered along with existing trails.

Offsite mitigation is recommended to offset unavoidable impacts within HPH from trail density exceedances, consistent with HPH guidance. (See Mitigation, below). We also recommend that guidance for adaptive management and evaluation also be evaluated. (See “Sustainable Recreation Management,” below.)

- *Mitigation* - HPH guidance recommends offsite mitigation as the most appropriate strategy for offsetting unavoidable impacts from increased recreational trail use and



surface disturbance. We request that the Forest Service evaluate additional opportunities for additive, direct offsite mitigation within a biologically significant geographic area equivalent or greater to HPH affected by trail density threshold exceedances, or not included in seasonal closure area. If equivalent direct offsite mitigation is not feasible, we request that the Forest Service coordinate with CPW to establish enforceable guidance for achieving comparable benefits through indirect mitigation, additive to management direction enforcement.

II. Outstanding Overarching Considerations and Recommendations

Enforcing Existing Management Direction

CPW and DNR agree that the Purpose and Need establishes the relevance for evaluating non-system trail rehabilitation concurrently with new system trail expansion in this decision process. However, we wish to clarify a potential misunderstanding regarding the NEPA analysis, in reference to the following characterization on p. 4 of the Draft EA:

- *Conversations with Colorado Parks and Wildlife have led to mutual agreement that non-system trails and associated impacts need to be addressed concurrently with adding any proposed trails in more sustainable locations.*

It would be redundant, in our view, to justify the new management action by implementing activities already authorized to enforce existing management direction. (Or, in this case, proposing to offset the potential “deficit” environmental effects from new trail development with the “benefit” of implementing already-authorized trail rehabilitation, in compliance with current standards.) For this reason, DNR and CPW maintain that it is only appropriate to account for the effects of additive controls, new activities, or changed standards that have not yet been vetted under a prior NEPA decision, in a new NEPA determination.

Sustainable Recreation Management Outcomes

Strengthening Assurances - The effects analysis finds that “Use conflicts and resource impacts would be reduced through a combination of proper trail design, a diversity of trail experiences being provided, education, engineering, and enforcement.” (Draft EA, 27) The determination, takes the following assumptions, measured at the geographic area scale, into account: direct improvements to degraded sensitive habitat from illegal trail rehabilitation; future anticipated degradation from anticipated future trail building that will be avoided by expanding formal trail system, or deterred by future education and enforcement of use restrictions and prohibitions; conflicts and direct impacts that will be minimized by design criteria.

These management mechanisms and design criteria would alleviate adverse effects of proposed new trails development and help to reduce conflict from increased recreation. We are



not confident, however, that conflict minimization and behavior deterrence measures alone would adequately safeguard sensitive or protected resource values, especially in light of unpredictable socioeconomic and environmental variables. Furthermore, we cannot draw conclusions about the potential localized impacts within CRAs, HPH or other sensitive areas, as the unit of analysis is the geographic area scale.

Sustainable Recreation Management Framework - DNR and CPW maintain that the most effective way to strengthen assurances for “sustainable recreation” management outcomes is to establish an adaptive framework and procedural guidance for tracking, assessing and responding to changes in resource conditions at appropriate geographic and time scales. An adaptive framework would specify monitoring objectives, and adaptive criteria for assessing key performance and environmental indicators of desirable attributes for ROS class settings, Roadless characteristics, sensitive wildlife habitat and related biological management objectives, to guide future decisions for maintaining desired conditions.

Adaptive frameworks are also important decision tools for managing visitor use and recreation objectives. The Interagency Visitor Use Monitoring Council indicates that adaptive monitoring and decision-making are essential for understanding “how conditions change over time...” for providing “a much richer and more complete picture to determine whether new management actions are needed to achieve and maintain [or improve upon] desired conditions.”⁸

Adaptive Trail Development - We further propose that the Forest Service evaluate the feasibility and potential merits of adopting an adaptive guidance for initial and subsequent phases of trail construction in the Ferndale network to reduce risk to sensitive and protected resource values in HPH and the Long Park CRA. An adaptive implementation approach could be helpful in aligning future development with changing demand; and honing management strategies in order to preempt the need for costly corrective action; and align future development with changing demand.

Monitoring Objectives and KPIs - Ideally, a comprehensive monitoring strategy would track relevant key environmental (KEI) and performance (KPI) indicators, across multiple geographic and time scales, to inform both near-term course adjustments and long-term project planning decisions for maintaining desired “sustainable recreation” management outcomes. In a resource-constrained scenario, however, it may be necessary to optimize monitoring in support of strategic priorities. Considerations for prioritizing indicators might include: effort and expense of inventory collection; complexity and accuracy of assessment tools; breadth of applicability and degree of relevance of insights to be gleaned; standard enforceability; outcome priority; decision urgency. indicators would be optimized for strategic priorities.

⁸ Interagency Visitor Use Monitoring Council, Monitoring Guidebook, June 2019



At a minimum, we would expect a monitoring strategy to provide insights into KEIs and KPIs (e.g. recreation use and visitation) relevant to actionable management decisions for controlling localized ROS Class social setting attributes within HPH and CRAs

- ROS class KPIs are not effective proxies for wildlife or biological resource attributes, but would likely be relevant to most of the factors that could be controlled with available management “levers”
- Low-cost data and relatively low-skill monitoring methods, including trail counters and cameras, GPS apps, and in-situ observation, may present opportunities to facilitate inventory collection at scale, if effective data quality assurances are in place. (See *Cooperative Monitoring*, below)

Cooperative Sustainable Recreation Monitoring - If appropriate, we suggest that the Forest Service explore opportunities for developing a voluntary sustainable recreation monitoring program, in cooperation with community organizations, recreation user groups, municipal government, and/or other interested community stakeholders. While the Forest Service would ultimately be responsible for standard enforcement, extensive research suggests that they can be effective in extending observational, data collection and public outreach capabilities, expanding local support for objectives, and improving collective accountability for program outcomes.

- Cooperative management models have gained traction in Colorado, and preliminary conversations suggest that there may be sufficient interest among local partners for this approach to be a viable option to explore.

Colorado Cooperative Recreation Partnerships:

- Colorado Plateau Mountain Bike Trail Association (COPMOBA) [Trail Ambassador Program](#)
- Vail Valley Mountain Trails Alliance [Wildlife Trail Ambassador Program](#) (partnership with USFS WRNF Eagle Holy Cross Ranger District)

Cooperative Management Frameworks (Appendix B):

- Sloan Canyon [Recreation Monitoring Plan](#) (BLM)
 - [Tenderfoot adaptive management plan](#) (USFS)
- Provided that explicit monitoring protocols and enforceable decision criteria are in force, efficiencies may be gained by deferring to a post-decisional planning process.

Ongoing Wildlife-Recreation Studies

- We request that the Forest Service coordinate with CPW to minimize disruption to ongoing wildlife monitoring studies evaluating wildlife responses to recreational activity in



the RNF. Research findings are expected to improve our understanding of baseline biological conditions and provide insights relevant to project management objectives.

- *RNF Elk/Recreation Study* - CPW, U. Wyoming and the Forest Service are studying effects of recreation on elk behavior and habitat use in a study area located between Rabbit Ears Pass and Seedhouse Road near the town of Clark, Steamboat Springs, and Highway 14 in Jackson County. Findings will quantify the recreation landscape across elk calving, post-calving, rut, and post rut seasons. GPS collaring data will be used to assess their seasonal space use and behavioral patterns. Data collection concluded in November, 2021, results are forthcoming in 2022-23.
- *Routt/Roaring Fork Elk Abundance Study* - CPW is using field camera sampling to create space-to-event and time-to-event models to estimate elk abundance across four study areas with different levels of human recreation activity in Routt County, and four along the Roaring Fork Valley in Pitkin and Garfield County, working with Forest Service researchers to index human activity.
- *BCR Recreation Overlay Bird Monitoring Project* - CPW supports a long-term monitoring study through Bird Conservancy of the Rockies' Integrated Monitoring In Bird Population Regions (IMBCR) program. Survey data collected at various distances from recreational trails will evaluate species composition, density estimates, occupancy estimates for various avian communities at sites within the Routt and White River National Forests, BLM Colorado River Valley Field Office. Surveying will continue through 2023, with published results in 2024.

Public Safety Considerations

The Draft EA indicates that input from the Colorado Department of Transportation (CDOT) informed trailhead placement design and engineering objectives. However, it is unclear from the information presented whether CDOT has provided input on the proposed plans, or if this is in reference to input provided on a previous proposal, or findings from a 2016 trailhead study (Appendix C). We encourage the Forest Service to work closely with CDOT to ensure that plans for expanded points of access and trailhead configuration comply with public safety and transportation management guidelines and recommendations. Additionally, we would request that any documentation relevant to transportation or public safety considerations be made publicly available as part of the public record.

To summarize the recommendations outlined above, we encourage the Forest Service to:

- Clarify the analytical framework and assumptions applied in the effects analysis to improve transparency of findings



- Adopt enforceable monitoring protocols and adaptive decision criteria for maintaining desired attributes and conditions for sensitive wildlife and biological resource, ROS class, and related Roadless characteristic values
- Consider opportunities to involve local stakeholders and user groups in a cooperative monitoring and adaptive management plan
- In coordination with CPW, evaluate options for offsite mitigation additive to existing management direction to offset unavoidable impacts from new trails in elk production HPH located outside of the recommended ½ mile buffer distance or seasonal closure area boundary, or that exceed recommended 1 mile / square mile density threshold
- Coordinate with CDOT to address transportation and safety considerations in trailhead expansion and reconfiguration in a final plan

DNR and CPW welcome the opportunity to further discuss our feedback on the Proposed Action or assist in evaluating additional input received during this public comment period. We remain committed to partnering with the Forest Service in developing robust, practicable, and defensible plans for advancing the Purpose and Need in a final proposal.

Sincerely,



Timothy Mauck
Deputy Director

CC:

Dan Gibbs, Executive Director, DNR
Heather Dugan, Acting Assistant Director, CPW
Travis Black, Northwest Region Manager, CPW
Kris Middendorf, Area 10 Wildlife Manager, CPW
Michael Woodbridge, Hahn's Peak/Bears District Ranger, USFS

List of Appendices:

Appendix A: Design Element Suggestions
Appendix B: Adaptive Management Plan Examples
Appendix C: Trailhead Study Maps





APPENDIX A: Design Element Recommendations

New Design Element #TBD

(Sustainable Recreation Plan)

- Contingent upon adequate funding and community participation, within six months of a decision, Forest Service will convene a relevant state and local agencies, community and user groups, to establish procedures for cooperatively monitoring recreational use, visitation, and other indicators relevant to evaluating ROS class setting conditions and/or related priority management outcomes.

Other Proposed Revisions/Additions to Design Elements

Rehabilitation of non-system trails

Design Element #6 (Management):

Existing:

- Re-use of rehabilitated non-system trails may be prevented with signage, public education, a physical barrier or any combination of the three.

Proposed revision:

- Physical barriers, trail signage and/or other public outreach and education methods will be employed in priority areas identified in sustainable recreation plan, such as high priority habitat, with the goal of preventing unauthorized re-use of rehabilitated trails consistent with recommendation in sustainable recreation plan, and/or other Forest Service priorities, identified in consultation with CPW.

Proposed Additional Design Element (Monitoring) #6A

- Trail use monitoring methods, such as counters, cameras, GPS, social media monitoring, and/or in-situ observation, will be employed to monitor unauthorized uses in restricted areas to inform future management action, resources or capacities or resources needed to enforce management direction, consistent with sustainable recreation guidance.
- If monitoring demonstrates unauthorized construction or use non-system trails in priority areas exceeding levels acceptable for maintaining desired conditions, and/or otherwise contributing to resource degradation (per criteria to be identified in forthcoming sustainable recreation plan), additional enforcement measures, such as trail ambassadors and/or rangers, will be employed to better enforce management direction

Recreation

Design Elements 37, 38 (Management)

Recommendation:

- Consider streamlining if #37 and #38 intend to address the same issue, or clarify if not, as there seems to be considerable overlap.
- Add “sustainable recreation outcomes” to information provided on non-system signage, materials

#37 Existing:

- Public education measures (for example, trailhead signage) will be used to notify the public that the trailheads and trails are pack-it-in, pack-it-out for human generated trash to reduce the potential for black bear habituation to human rewards.

#38 Existing:

- At trailhead locations, signage will be installed to inform the public that trash will be “pack it in, pack it out” to avoid habituation and human-bear conflicts. The Forest Service will work with Colorado Parks and Wildlife on educational signage to be placed at trailhead locations to inform the public on how to minimize conflicts.

Wildlife

Design Element #44 (Closure Area)

Existing:

- There may be seasonal restrictions on proposed trails and/or segments of proposed trails to protect elk production (calving) habitat. There will be a mandatory closure from May 15-June 30 in the Ferndale area on segments 23, 24, 25, and 27 based on current information. If adjustments to seasonal restrictions are needed, it will be determined on a case-by-case basis in collaboration with Colorado Parks and Wildlife.

Proposed revision:

- There may be seasonal restrictions on proposed trails and/or segments of proposed trails to protect elk production (calving) habitat. There will be a[n initial] mandatory closure from May 15-June 30 in the Ferndale area on segments 23, 24, 25, and 27 based on current information. [If unauthorized usage exceeds acceptable levels, as identified in the sustainable recreation plan, additional enforcement mechanisms will be employed to prevent unauthorized usage. In consultation with CPW, HPH maps and wildlife data will be reviewed every 3 years, or on a case by case basis, to determine if adjustments to seasonal closures areas or use restrictions are warranted.]

Note: Seasonal closures on 20, 21, 22 also should be considered

Design Element #45

Existing:

- Management actions related to seasonal restrictions will include a suite of educational tools (for example, signage, media, volunteers, ranger patrols), engineering actions (for example, restoration activities, barriers), and administrative actions (for example, restricted use area designation, closures, regulations). Management actions would be phased in from least restrictive to more restrictive to preserve visitor freedom, to the extent feasible, and in balance with resource needs.

Proposed revision:

- Management actions related to seasonal restrictions will include a suite of educational tools (for example, signage, media, volunteers, ranger patrols), engineering actions (for example, restoration activities, barriers), and administrative actions (for example, restricted use area designation, closures, regulations). Management actions would be phased in from least restrictive to more restrictive to preserve visitor freedom, to the extent feasible, and in balance with resource needs [...according to recommended protocol in sustainable recreation plan, or other criteria to be determined in consultation with CPW to ensure adequate avoidance of wildlife-recreation conflicts in closure areas.]

APPENDIX B

Recreation Monitoring Plan

RECREATION MONITORING PLAN

The Recreation Monitoring Plan contains the monitoring approach that will be used at the Sloan Canyon National Conservation Area (NCA) to ensure that management actions meet the recreation management goals and objectives described in the Approved Resource Management Plan. This Recreation Monitoring Plan is organized by resource area, followed by resource goals, objectives, and actions, and finally a description of the monitoring methods.

1.0 RESOURCE MONITORING

Monitoring is the process of collecting information to evaluate the effects of selected management actions, public actions and interests, and impacts in relation to the RMP goals and objectives and to ensure compliance with applicable laws, regulations, and policy. Data describing changing trends over time are collected and used to determine whether desired outcomes are being met.

Because the NCA and the North McCullough Wilderness were relatively recently designated, the Bureau of Land Management (BLM) Las Vegas Field Office has just begun to focus management attention on the area. Consequently only limited specific resource and visitor use baseline data exist. In addition, visitor use is expected to change drastically as urban growth surrounds the NCA, trails and facilities are developed, and the NCA transitions and management decisions contained in the RMP are implemented.

This Recreation Monitoring Plan is designed to be outcome-based, technically feasible, affordable, and operationally attainable. Three types of monitoring will occur to determine the current status of the NCA baseline and to measure changes to it:

- **Baseline Monitoring**—What are the current baseline conditions?
- **Implementation Monitoring**—Were the decisions and actions developed during planning implemented?
- **Effectiveness Monitoring**—Did the implemented action result in changes to resource condition, visitor numbers, activity types, and duration of stay? Did changes in the indicators exceed thresholds established for achieving the objectives?

To monitor change within the NCA, BLM staff would identify and track indicators, which are specific elements of the NCA setting that change in response to human activities. Indicators provide quantitative documentation on how much conditions have changed, serve as tools for examining trends and highlighting problems, and can act as an early warning to predict future conditions. When compared with standards that describe the acceptable limits of change, indicators can signal the need for corrective action, evaluate the effectiveness of management actions, and help determine whether desired conditions are being achieved. To accommodate the need for management flexibility as this development occurs, a baseline would be established and used to determine appropriate indicators and limits of acceptable change. The indicators would be monitored frequently as the NCA facilities are developed. As visitation and recreation opportunities stabilize, the monitoring frequency would become more static.

2.0 RECREATION MONITORING

Two different aspects would be considered during recreation monitoring: the social setting and the physical setting. The number of people and the number and type of encounters that take place in defined settings characterize the social setting. The physical setting includes the physical landscape and environment, ranging from primitive areas where the landscape is remote, pristine, and shows minimal evidence of human presence, to more developed areas that are manipulated to provide a desired setting and include an abundance of facilities to accommodate heavy recreational use. The first objective and its associated goals and actions refer to the social setting. The second objective refers to the physical setting.

Goal: Provide recreation opportunities within the NCA, including the North McCullough Wilderness, consistent with the Sloan Canyon NCA Act (Title VI of the Clark County Conservation of Public Land and Natural Resources Act of 2002) and Clark County Act, Title II (“Wilderness Areas”).

Objective 1

Provide an array of outdoor recreation opportunities and experiences within the NCA.

Management Actions Examples

Interpretive opportunities designed to enhance recreation experiences through information on the NCA’s unique cultural and natural resources would be provided to visitors.

A trail system would be developed to accommodate multiple trail uses in appropriate areas of the NCA and would be appropriately managed near wildlife water developments. Trail designs that avoid sensitive natural and cultural resource areas and Special Status Plant communities would be emphasized. Site-specific resource conditions would be considered when selecting and designing trails and adding new trails, including avoiding areas of sensitive wildlife habitat. Trails outside the North McCullough Wilderness would be evaluated to determine if they should be developed as an Americans with Disabilities Act of 1990 trails. Additional trails could be added to the trail system when a new trail would not cause substantial impacts to sensitive cultural or natural resources and would improve visitor experiences. Unauthorized constructed and social trails would be evaluated to determine whether to close and restore, or adopt them into the trail system. Permits for overnight parking to support recreation activities would be available on a case-by-case basis.

Monitoring

The formal method of monitoring the social setting would be through visitor satisfaction surveys. These comprehensive surveys would include information concerning visitor demographics, preferred activities, recreation experiences and benefits, and setting preferences, as well as evaluation of BLM management, facilities, and services. Visitor surveys would be conducted for at least 1.5 years following the completion of the RMP to establish baseline data for the seasonal variation in visitation, and regularly thereafter as the plan is implemented and visitation increases.

Monitoring would also be performed on an informal basis by BLM field personnel, volunteers, and through public participation. BLM field staff and volunteers will have training to gather data through visitor contacts and observation of social conditions. Comments from the public in the form of letters, telephone calls, e-mails, public meetings, feedback from special interest groups, or office visits will be collected and reviewed. When informal monitoring begins to indicate that the desired condition of the social setting is not being met, the next formal visitor survey should be implemented as soon as possible.

Objective 2

Manage recreation uses so that recreation-related disturbances are minimized.

Management Action Examples

Special recreation permits (SRP) could be issued consistent with the purposes of the NCA and North McCullough Wilderness to control visitor use, protect recreational and natural resources, provide for the health and safety of visitors, and provide a fair return to the Government for the opportunity to make a profit for the commercial recreational use of public lands. Competitive or vending SRPs could be issued within the NCA but not in the North McCullough Wilderness. Outfitters and guides wanting to guide hunts and conduct interpretive programs within the NCA would be required to obtain a commercial SRP from the NCA Manager to minimize potential conflicts among recreation uses. Outside the Petroglyph Management Area, organized groups would be required to obtain an SRP. Ongoing evaluations of the number, appropriateness, and impacts of commercial and competitive SRPs would be conducted, and limits could be placed on the issuance of commercial and competitive SRPs based on the evaluation and consistency with the purposes of the NCA. The NCA would be managed, in part, through Management Emphasis Areas zones.

Hiking and equestrian use would be allowed in designated areas. In trail areas, cross-country use could occur until BLM establishes and constructs trails. In open areas, cross-country travel is allowed. Mountain biking would be allowed only on a system of proposed trails and vehicle roads; cross-country biking is prohibited. Off-highway vehicles use would be prohibited throughout the NCA.

Primitive and dispersed camping would not be allowed in the Petroglyph Management Area or its north access, but it would be allowed in designated areas in other portions of the NCA. Campfires would be allowed at camping sites in fire pans or using fire blankets. No natural fuels in the NCA can be used for campfires, and all fuels must be packed in and out of the NCA. Further, all fire waste products must be packed out.

No forms of rock climbing would be allowed within the Petroglyph Management Area and its northern access, but bouldering and traditional rock climbing could be allowed outside designated sensitive resource areas in the remainder of the NCA. All forms of recreational target shooting, except permitted hunting, would be prohibited. Dogs, on leash, are allowed in the designated areas and are prohibited in the remainder of the NCA. Dog feces must immediately be picked up and packed out. Rockhounding and geocaching would be prohibited throughout the NCA.

Monitoring

Indicators used for monitoring recreation would include visitor use, evidence of human and dog waste, vandalism, areas of impact, and SRP stipulations. Methods used for monitoring would include visitor surveys for numbers of encounters, trail counters, trailhead registers, ongoing management observations, recreation site and facility measurements, and permit evaluation and compliance. The frequency of monitoring would vary as development and visitation increase.

A team comprising appropriate BLM resource specialists would conduct formal monitoring for the physical setting. The resource specialists would determine the frequency of monitoring, but during the first phase, a comprehensive assessment would be conducted for at least 1.5 years following the completion of the RMP to establish baseline data for the seasonal variation in visitation.

Volunteers and BLM field personnel would conduct informal monitoring on a routine basis. Monitoring would occur by performing a visual assessment during normal field operations and implementing a photo monitoring program. If informal monitoring results in resource concerns, an appropriate resource specialist would be notified.

Tenderfoot Mountain Motorcycle Trail System Proactive and Adaptive Management Plan Final Draft - June 20, 2013

Note that the following proactive and adaptive management plan was developed by and for the Tenderfoot Task Force. This living document forms the basis for the Task Force's charge.

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
Access Management and Trailhead Parking	<p>Parking occurs only in designated parking areas (Frey Gulch and Straight Creek Trailheads).</p> <p>The Frey Gulch Trailhead is designed to allow for easy ingress and egress. The parking lot is large enough to accommodate an average of 20 riders per day and include additional spaces for non-motorized users.</p> <p>Parking and staging does not occur in locations away from trailhead (e.g. along Landfill Road, Frey Gulch Road or Straight Creek Road)</p>	<p>Signs will be placed on information kiosks at both trailheads that encourage trail users to park only in designated parking areas. The signs will also indicate the location of the alternate trailhead and parking area to be used when a parking lot is full. In instances when both parking lots are full, users will be encouraged to contact or visit the Dillon Ranger District office for recommendations of other areas to ride. Boxes with MVUMs (Motor Vehicle Use Maps) and trail maps will be available at both trailheads.</p> <p>Carpooling will be encouraged during volunteer workdays or other group activities.</p>	<p>The Maintenance / Patrol Crew will routinely monitor, document and report trailhead conditions including, but not limited to:</p> <p>The number of vehicles using the parking lot</p> <p>The number of vehicles parked on nearby roads when the parking lot is full.</p> <p>Vehicles blocking entrance or exit or otherwise obstructing traffic flow.</p> <p>Vehicle accidents.</p>	<p>Parking capacity is exceeded as defined by monitoring protocols 2-4 more than 10 days/season at either trailhead, or less at Forest Service discretion.</p>	<p>"No Parking" signs will be installed along the roads leading up to the parking areas</p> <p>A special order from the Forest Service may be initiated which officially prohibits parking on the roads.</p> <p>The parking lots may be expanded as contemplated in the proposed action.</p>
Frey Gulch Toilet and Waste Facilities	<p>Trailhead and surrounding areas are free of human waste and trash.</p>	<p>There will be educational materials on kiosk about pack in/pack out trash.</p>	<p>Once per week the Maintenance/Patrol Crew will monitor and document human waste incidents within 200 feet of the trailhead. All evidence of an incident will be removed immediately so that it is not counted again. An annual summary report will be produced at the end of each</p>	<p>More than 16 incidents per year, or less at Forest Service discretion.</p>	<p>If human waste incidents exceed 16/year for the first year, all educational materials will be updated to include information on human waste at trailhead. If after two years there are still 16 incidents/year, a toilet facility will be constructed at the trailhead.</p>

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
Off-trail Use and Use of Closed Routes	Motorcycles, ATVs and mountain bikes do not travel off designated routes. Closed routes are not being used.	There will be signs at each trailhead and on brochures and websites encouraging users to stay on designated trails. All informational materials will include a phone number that allows any individual to report violations to the Forest Service. At least 12 patrols per month during the riding season (ideally three per week) will be conducted by the Maintenance Patrol crew, other District FPOs, and SCORR volunteers. If evidence of off-trail use or use of closed routes is observed or reported, a 5300-1 (Incident Report) will be completed. Monthly reports summarizing the location and number of off-trail incidents will be documented.	riding season. A reportable incident will be defined as a first person observation or clear evidence on the ground (e.g. tire tracks). Areas where there are reoccurring violations will be identified, and documented and monitored more frequently to discourage continued use.	When an incident of off-trail use, or use of closed routes, is observed all evidence of such use will be obliterated ASAP, and no later than within two weeks. If use continues, signs will be posted. Areas requiring more substantial rehabilitation efforts will occur no later than October 15 each season. If incidents of illegal use reoccur at the same location, or multiple locations, more than 5 times per month, patrols will be increased by one day per week. If problems persist, additional patrols will be added until such problems are contained. If problems are consistently observed at specific locations, or on specific trails, and increased patrols are unable to contain the problem, the trail(s) in question may be closed. If chronic illegal off-trail use or use of closed trails occurs (5 or more times per month for 4 months), the entire trail system or substantial portions of it may be subject to closure. Closures will remain in effect until a new management strategy can be developed and implemented to deal with off-trail incidents. The number of off-trail incidents should steadily decrease as the trail system ages. If a trend toward fewer off trail incidents is not observed, reevaluation and additional actions will be considered including possible trail closures.	It will be cleaned and maintained by the Maintenance / Patrol Crew.
Revegetation of Routes Identified For Closure	Closed trails are revegetated to a natural state and are free of noxious and invasive species.	Physical closure and scarification should result in natural revegetation.	The closed trails will be monitored by the Maintenance/Patrol Crew for successful revegetation and noxious weeds starting two years after closure.	Less than 75% of revegetation coverage or consistent with adjacent natural areas.	If revegetation is not occurring naturally, then seeding with only native grass and shrub mix will occur the following fall. Closure of trails will occur

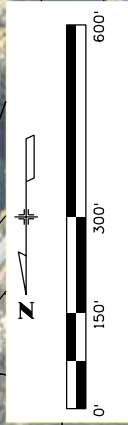
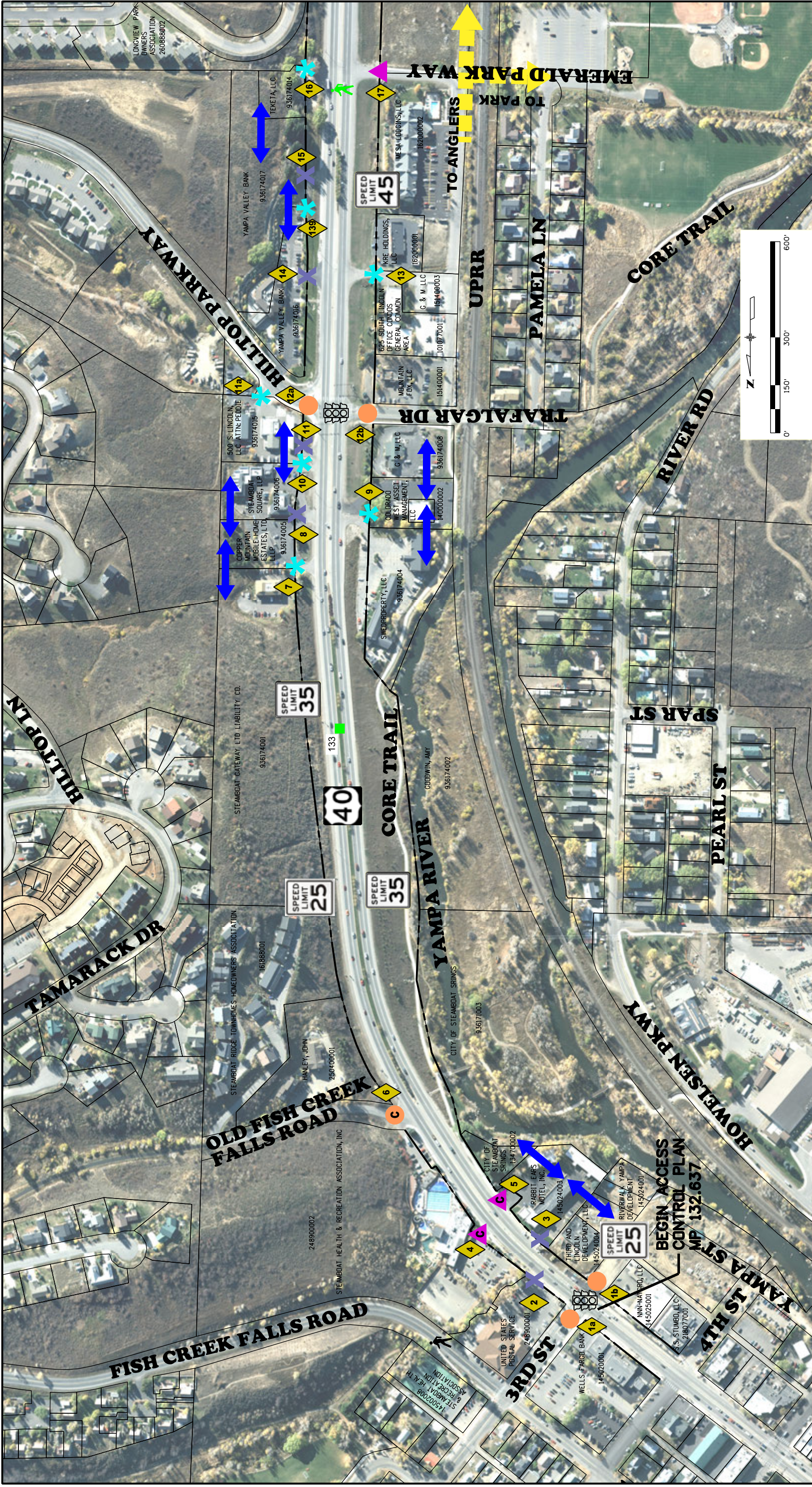
Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
	Drainage is adequate with no erosion.		Revegetation will be considered successful if there is at least 75% vegetation coverage consistent with adjacent vegetation after 24 months. Representative samples will be taken on the trail length to determine the amount of revegetation.		with placing debris, signs, and drainage structures as well as scarification as needed to break up the soil. Noxious weed management will be performed by the district weed specialist if monitoring identifies the presence of noxious weeds.
Signs and Infrastructure	All signs and infrastructure continue to function as intended, remain in the locations they were placed and are maintained in good working condition.	All signs and other necessary infrastructure will be installed before trails are opened. SCORR will work with USFS to replace damaged or missing signs. The Dillon Ranger District phone number will be posted at the kiosk to report trail system issues.	Sign location waypoints will be established using GPS and infrastructure monitored. Maintenance/Patrol Crews will continually monitor all signs and other infrastructure.	Chronic vandalism or theft in localized areas.	Missing or damaged signs and other infrastructure will be replaced as soon as practical. If chronic vandalism or theft occurs, other actions will be considered.
Dispersed Campsites	Campsites are located sustainably (as measured by compliance and resource damage), and free of litter, substantial vegetation damage, human waste, and smoldering ashes. No camping occurs in or immediately adjacent to parking lots.	Contacts will be made with campers to educate them about expected camping behavior (human waste, litter, campfires, etc.). Guidelines for the Maintenance / Patrol crew will include performing inspections, visitor contacts, litter and human waste pick up, and ash removal at least once per week. "No Camping" signs will be placed at the Frey Gulch trailhead. The existing "no camping" signs located at the Straight Creek trailhead will be maintained.	With each inspection, the campsite will be rated as: Clean, Somewhat Clean, or Unclean. The site is Clean if no litter/human waste pick up is needed. If it takes less than 5 minutes to clean it is "Somewhat Clean." If it takes more than 5 minutes to clean, it is "Unclean."	New campsites created in unsuitable locations, such as within 100 feet of streams or in places creating undesirable resource damage.	Campsites in undesirable locations will be closed and rehabilitated as soon as possible after being discovered, and no longer than within one week. Visitor contacts in all occupied campsites will be increased to once per weekend day and once per weekday. Violation notices will be issued when necessary. If camping in undesirable locations persists, separate

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
		<p>All campsites located within 100 feet of streams will be closed.</p> <p>Educational materials will include good camping practices (i.e., trash disposal, campfire safety, sanitation, etc.).</p> <p>Campsites determined to be unsuitable due to potential or existing resource damage, etc. will be closed and rehabilitated.</p>			<p>analysis to limit camping may be considered.</p>
User Conflicts	<p>Riders of OHVs slow down when encountering other users on Frey Gulch Road. The reduction in speed is noticed by the other users. Complaints about excessive speed are rare.</p>	<p>Kiosk and information materials will inform all users to expect to encounter motorized users.</p> <p>The system is patrolled by volunteers, Forest Service and CPW staff as available.</p> <p>SHARE THE ROAD signs are posted on Frey Gulch Road.</p> <p>The Forest Service will determine a cautionary speed limit which will be posted along Frey Gulch Rd.</p> <p>The Forest Service will determine the number of signs needed. Educational materials and visitor contacts will include emphasis on slow speeds on Frey Gulch Road.</p>	<p>The Forest Service will document the number of complaints within the Tenderfoot trails system.</p> <p>The system trails and roads will be patrolled by the Forest Service and volunteer Maintenance / Patrol Crews according to the frequency previously identified in the Education and Enforcement Plan. These crews will document complaints about excessive speeds. Forest Protection officers will issue warnings to riders observed exceeding reasonable speed. Volunteers will provide verbal warnings to riders who are observed exceeding reasonable speed.</p>	<p>More than 5 complaints about excessive speed are received per riding season will trigger a range of potential additional management options as determined appropriate by the Forest Service.</p>	<p>One or more of the following management actions may be implemented, as determined by the Forest Service:</p> <p>Speed bumps may be installed in locations that are subject to habitual speeding if determined to be effective and feasible.</p> <p>Alternating days of use between the various user groups may be instituted.</p> <p>Under separate analysis, determine modified non-motorized routes as an alternative to Frey Gulch road intersections.</p> <p>Install signs identifying “closed throttle” zones where there is shared use</p>

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
<p>Noise Impacts</p> <p>The trail system does not significantly disturb nearby residents and visitors in the area.</p> <p>The trail system does not significantly displace non-motorized users from the existing non-motorized system trails.</p>	<p>Establish "Closed Throttle Zones" in proximity to the trailheads.</p> <p>Where possible, trails should be located in order to use existing natural features and vegetation to reduce noise impacts.</p> <p>The trail system will be closed daily from 8:00 p.m. until 8:00 a.m.</p>	<p>The trail system will be monitored and noise complaints will be documented.</p>	<p>Verifiable complaints received by Forest Service during riding season.</p>	<p>near trailheads and in other locations as deemed appropriate.</p> <p>Forest Service staff will follow up on all complaints which may include noise testing to determine location of source of noise.</p> <p>More closed throttle zones may be established in areas that have been identified as being highly susceptible to contributing to noise impact on nearby homeowners.</p> <p>Alterations including trail realignments, closures, or other measures may be instituted to reduce noise impacts.</p> <p>Under separate analysis, determine modified non-motorized route for Tenderfoot hiking trail to reduce noise impacts.</p>	
<p>Special Events</p>	<p>Special events are small and infrequent.</p>	<p>Special Events will be limited to no more than 50 attendees and no more than two events per season (not including volunteer work/maintenance events) and will be subject to Adaptive Management threshold conditions being met. Events that attract spectators and encourage speed on the trail are strongly discouraged. All special events are subject to</p>	<p>A post-event special use authorization inspection will be done by Forest Service to identify resource impacts or other problems.</p>	<p>Significant resource or other impacts from events.</p>	<p>Special events will be discontinued or further limited if there are substantial adverse impacts, (e.g. resource damage, noise, injuries, etc.).</p>

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
Fire Risk	<p>The area is free of forest fires.</p> <p>All OHVs using the trail system have spark arresters.</p> <p>There are no unattended or abandoned campfires.</p>	<p>obtaining a special use permit and meeting all applicable NEPA requirements.</p> <p>Educational information on recommended fire prevention measures should be provided through the educational efforts recommended in the monitoring, education and enforcement section of this Plan.</p> <p>Provide clear signage at the trailheads alerting motorized trail users that spark arresters are required. Trailhead sign information could also include information about what types of bikes do have spark arresters (and that track bikes typically do not).</p>	<p>Patrols will check all OHVs they come in contact with to assure proper spark arresters are in place.</p> <p>The Maintenance / Patrol Crews will constantly monitor the trails and abandoned camp sites for any signs of fire.</p>	<p>Forest fires caused by an OHV or OHV related activity.</p>	<p>Any time there is an elevated fire danger, wildfire risk will be managed via the Fire Restrictions Process:</p> <ul style="list-style-type: none"> - More wildfire detection patrols will be conducted - More trail system monitoring and spark arrester enforcement will be put in place - During extreme fire danger, motorized OHV use can be restricted.
Cultural Impacts	<p>No theft or vandalism to any cultural resource</p>	<p>Trails have been aligned in order to provide appropriate separation from cultural sites to the maximum extent possible. In certain instances it may be desirable to provide interpretive signs or maps. The Forest Service will determine where and when such interpretive signs or maps may be acceptable.</p>	<p>The Maintenance/Patrol Crews will routinely monitor significant cultural sites and will document theft or vandalism via an Incident Report.</p>	<p>If cultural sites are impacted by theft or vandalism.</p>	<p>The Forest Service will consider a range of management actions that may include:</p> <ul style="list-style-type: none"> Trail relocation Additional signage Physical barriers Increased patrols of the location
Deer and Elk Impacts	<p>The trail system does not result in substantial elk displacement or disturbance to elk calving areas.</p>	<p>Extend seasonal motorized use trail closure of east portion of trail system (Management Area 5.43 except for trail segments</p>	<p>Colorado Division of Parks and Wildlife and/or Forest Service staff will observe and monitor elk during calving season to</p>	<p>Significant changes in elk behavior, and/or use of historical calving area attributable to motorized use.</p>	<p>Forest Service staff will increase patrols in the area with the assistance of CPW as available.</p>

Management Category	Desired Conditions	Proactive Recommendations	Monitoring Protocol	Thresholds Triggering Management Action	Management Actions
	<p>Elk summer-winter movement patterns are maintained.</p> <p>Seasonal motorized trail closures are complied with and enforced as necessary.</p>	<p>46-44-52-42-67-14-72-73) through June 30 to minimize disturbance to wintering deer and elk and to minimize impacts to calving elk.</p> <p>Provide signs about the closure at Frey Gulch and Straight Creek trailheads and connecting points to trail system within closure (42, 53, 59, 37, 34, 33, 32, 38, 49 & 48).</p> <p>Allow for trail maintenance/clearing prior to trail system opening.</p>	<p>Identify cow elk calving locations and herd use of entire management area during calving season prior to July 1.</p> <p>CPW will explore the possibility of funding a study to radio-collar and monitor elk in the area.</p> <p>Forest Service staff will monitor compliance with seasonal closures.</p> <p>All violations of the closure will be documented and reported.</p>	<p>Violations in closure area (off-road, closure violations, damage/removal of closure signs) exceed 5/month.</p>	<p>Expand/modify closure area on an as needed basis.</p> <p>Consider expanding closures to include all uses during calving season. This may require additional NEPA.</p>
Hunting	<p>Disturbance to elk is minimal, so that they remain in accessible areas during hunting season.</p> <p>Conflicts between hunters and other users of the trails and roads in the area are minimal.</p>	<p>Close east portion of trail system (Management Area 5.43 except for trail segments 46-44-52-42-67-14-72-73) to motorized uses prior to opening of the first rifle season to allow for hunter access.</p> <p>Closure area will begin October 10. (Rifle season generally opens on the second weekend of October, depending on the year).</p>	<p>CPW will monitor health of the elk population.</p> <p>Forest Service will monitor compliance with seasonal closures.</p> <p>All violations of the closure will be documented and reported.</p>	<p>Violations in closure area (off-road, closure violations, damage/removal of closure signs) exceed 5/month.</p> <p>Decreasing presence of elk in accessible areas during rifle hunting seasons.</p> <p>Overall health of elk population decreases.</p>	<p>Violations will result in increased patrols.</p> <p>Changes in health of elk population attributable to motorized use will result in reconsideration of the closure area to a greater portion or all of the trail system.</p> <p>User conflicts will trigger reconsideration of closure area to a greater portion or all of the trail system.</p>



- LEGEND:**
- Access Point
 - Full Movement
 - One Way Full Movement
 - Existing Pedestrian / Bicycle Crossing
 - 3/4 Movement Left-In
 - Right-In, Right-Out
 - Close Existing Access Point
 - Emergency Access
 - Proposed Pedestrian / Bicycle Crossing
 - Cross Access for Shared Access Point
 - Existing Signalized Intersection
 - Alternate Route (Conceptual)
 - Existing Access Easement

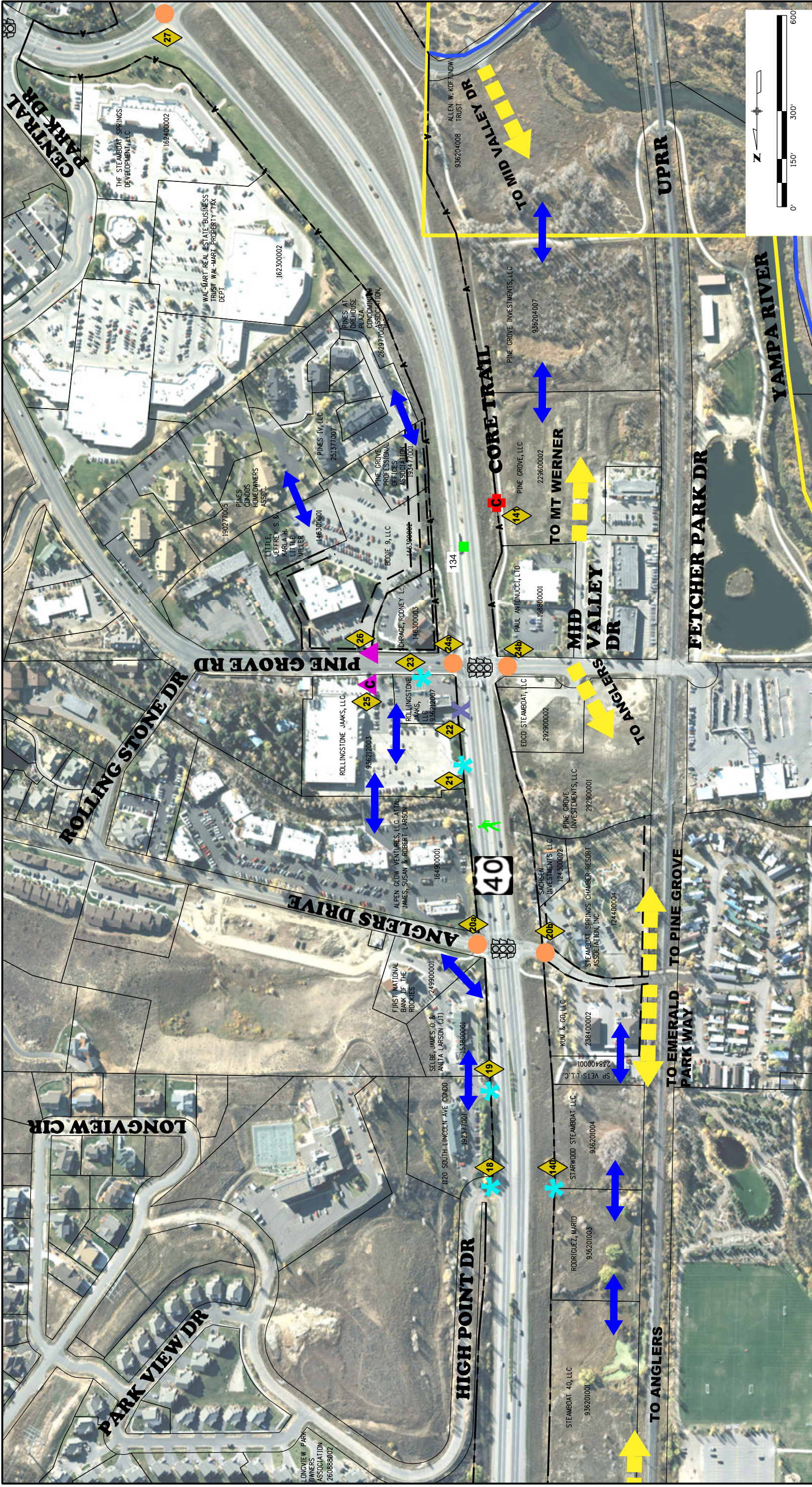
- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- Highway Right of Way
- Access Control Line
- "C" Conditional
- "F" Field Access
- "R" Residential Access
- Milepost



US 40 ACCESS EXHIBIT
1 OF 18

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RP 132.637 TO 133.450



US 40 ACCESS EXHIBIT

2 OF 18

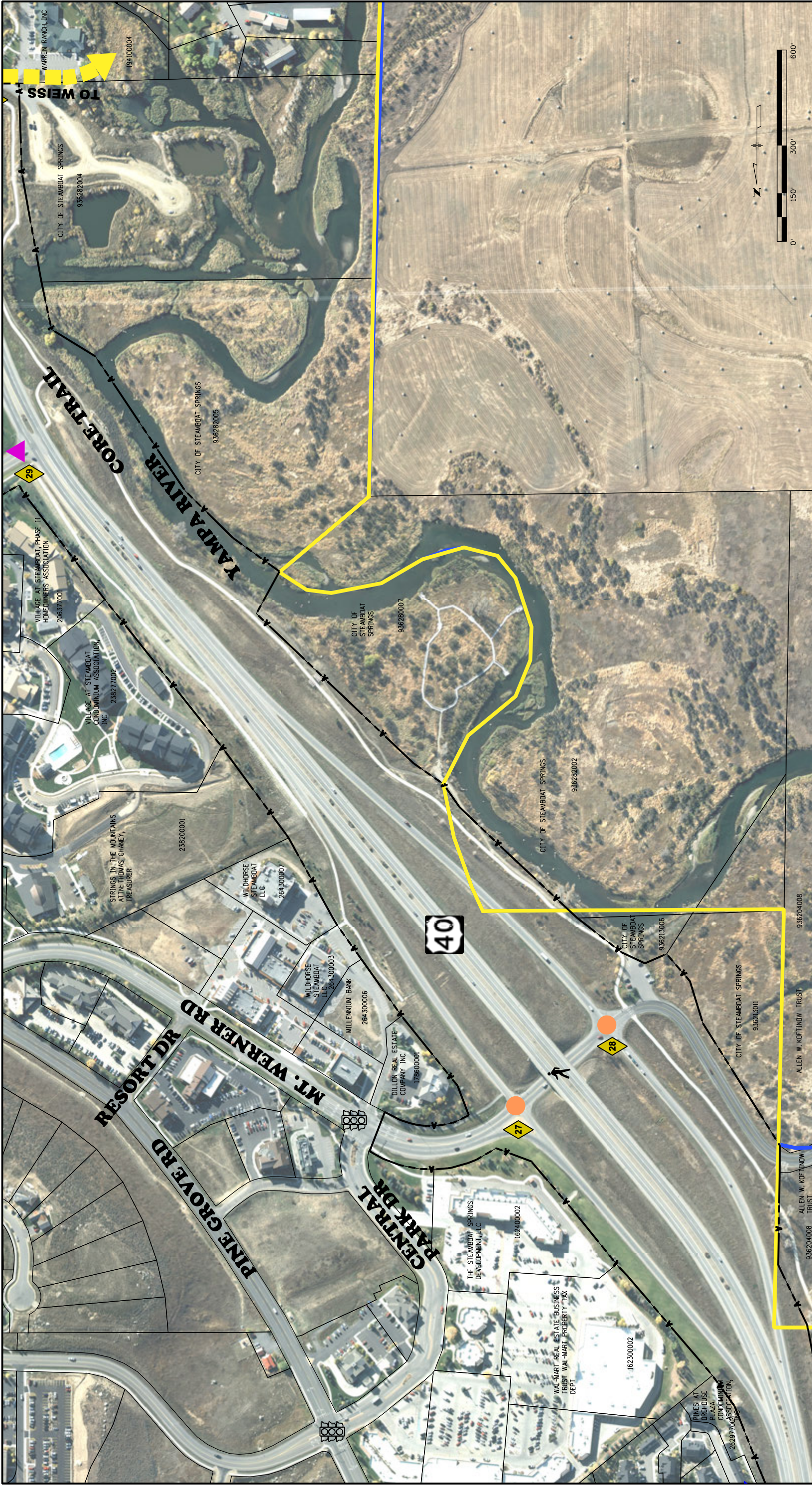
RP 133.450 TO 134.361

LEGEND:

- # Access Point
- Full Movement
- One Way Full Movement
- Existing Pedestrian / Bicycle Crossing
- ↔ 3/4 Movement Left-In
- ✱ Right-In, Right-Out
- ✕ Close Existing Access Point
- + Emergency Access
- Proposed Pedestrian / Bicycle Crossing
- ↔ Cross Access for Shared Access Point
- Existing Signalized Intersection
- ▬▬▬ Alternate Route (Conceptual)
- - - Existing Access Easement

"C" Conditional

- ▬ City Boundary
- ▬ Urban Growth Boundary
- ▬ National Forest Boundary
- ▬ Parcel Line
- - - Highway Right of Way
- - - Access Control Line
- ▬▬▬ Field Access
- ▬▬▬ Residential Access
- Milepost

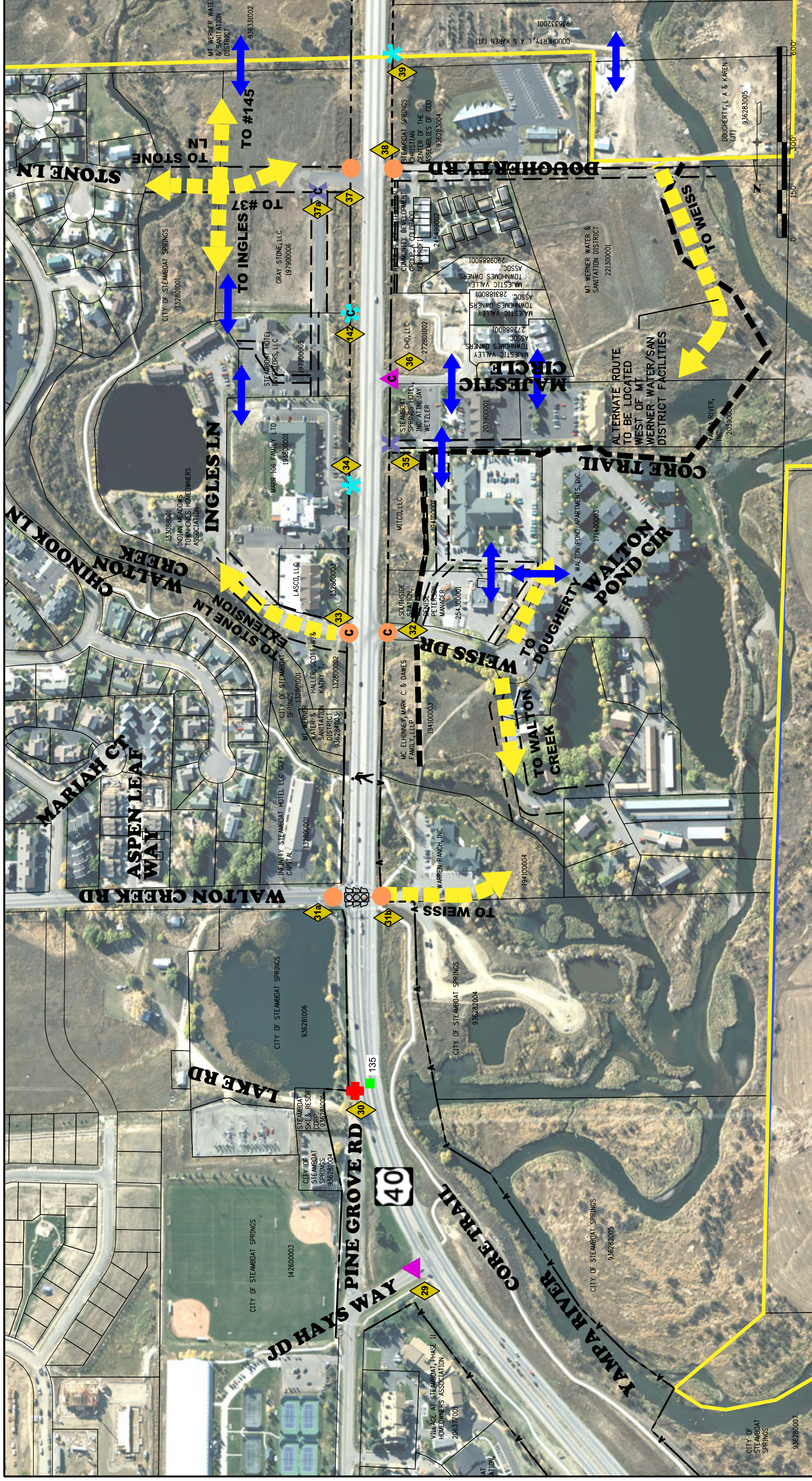


LEGEND:		"C" Conditional	
	Access Point		City Boundary
	Full Movement		Urban Growth Boundary
	One Way Full Movement		National Forest Boundary
	Existing Pedestrian / Bicycle Crossing		Parcel Line
	3/4 Movement Left-In Right-In, Right-Out		Highway Right of Way
	Close Existing Access Point		Access Control Line
	Close Existing Access Point		Cross Access for Shared Access Point
	Emergency Access		Existing Signalized Intersection
	Proposed Pedestrian / Bicycle Crossing		Alternate Route (Conceptual)
	Right-In, Right-Out		Existing Access Easement
	Close Existing Access Point		Field Access
	Close Existing Access Point		Residential Access
	Emergency Access		Milepost
	Proposed Pedestrian / Bicycle Crossing		

US 40 ACCESS EXHIBIT

3 OF 18

RP 134.361 TO 134.869



US 40 ACCESS EXHIBIT 4 OF 18

RP 134.869 TO 135.601

LEGEND:	City Boundary	"C" Conditional	Cross Access for Shared Access Point	3/4 Movement Left-In	Access Point
## Access Point					
Full Movement					
One Way Full Movement					
Existing Pedestrian / Bicycle Crossing					



LEGEND:

- # Access Point
- Full Movement
- One Way Full Movement
- Existing Pedestrian / Bicycle Crossing
- 3/4 Movement Left-In
- Right-In, Right-Out
- Close Existing Access Point
- Emergency Access
- Proposed Pedestrian / Bicycle Crossing
- Cross Access for Shared Access Point
- Existing Signalized Intersection
- Alternate Route (Conceptual)
- Existing Access Easement

"C" Conditional

- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- - - Highway Right of Way
- - - A Access Control Line

"F" Field Access

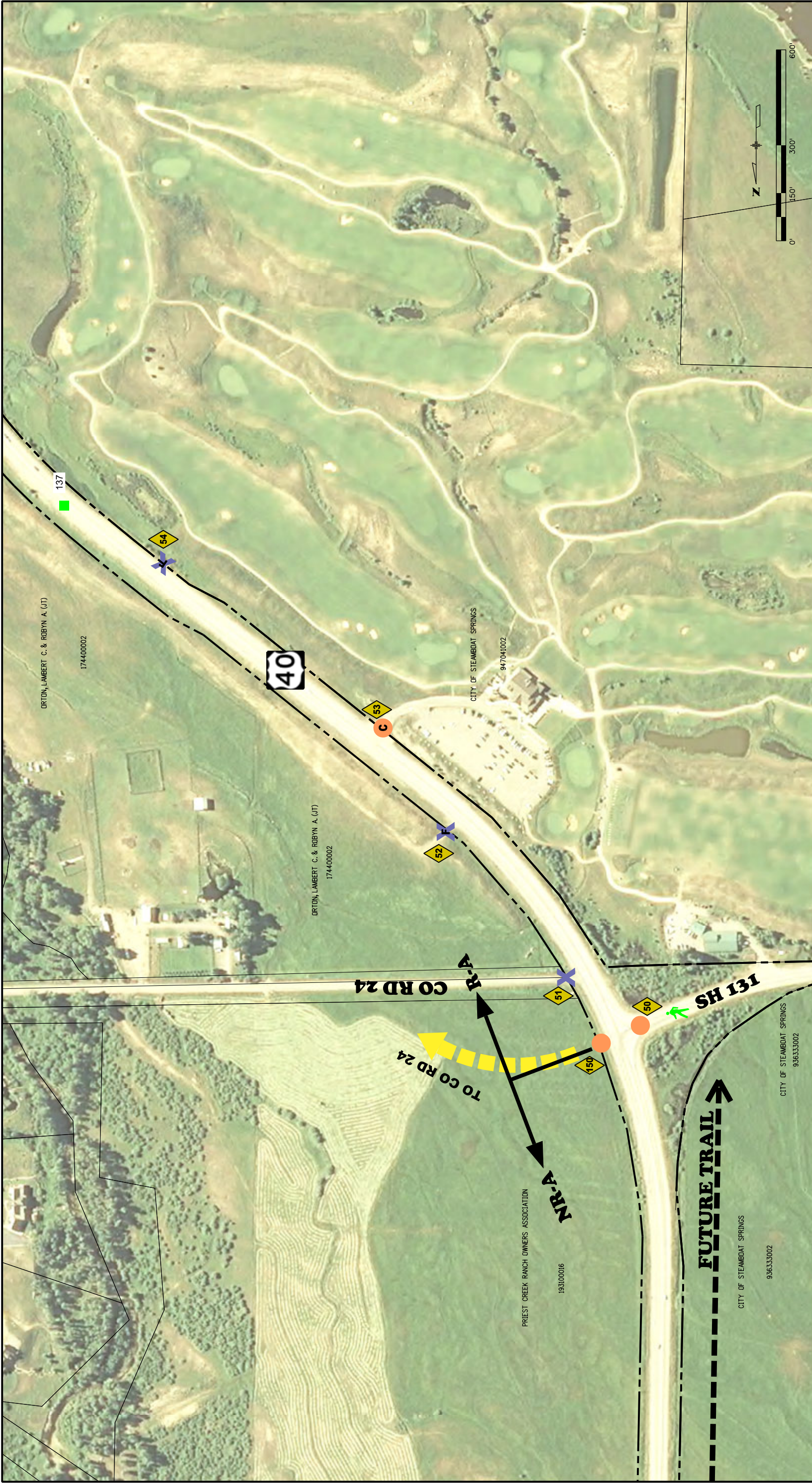
"R" Residential Access

- Milepost

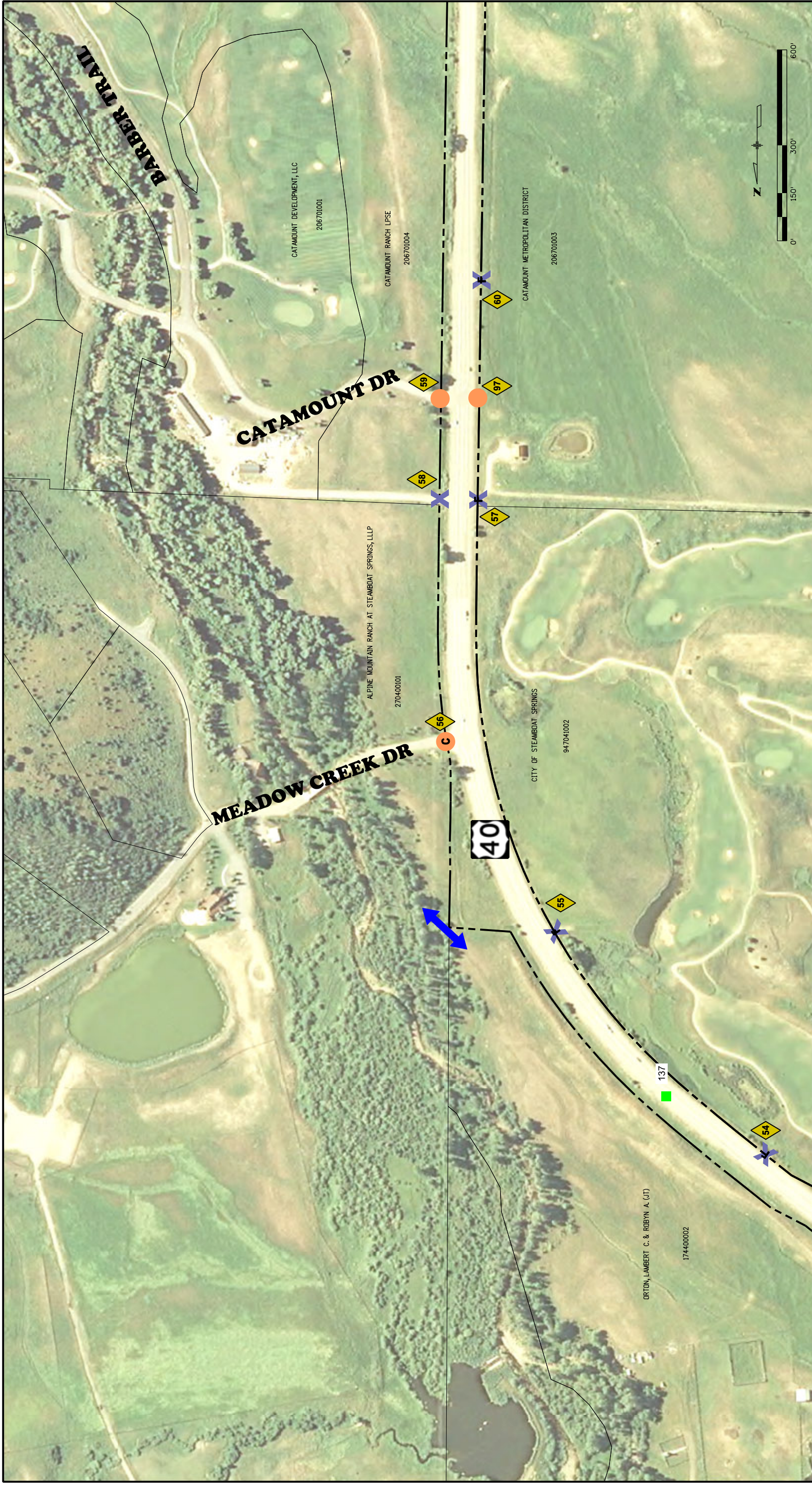
US 40 ACCESS EXHIBIT

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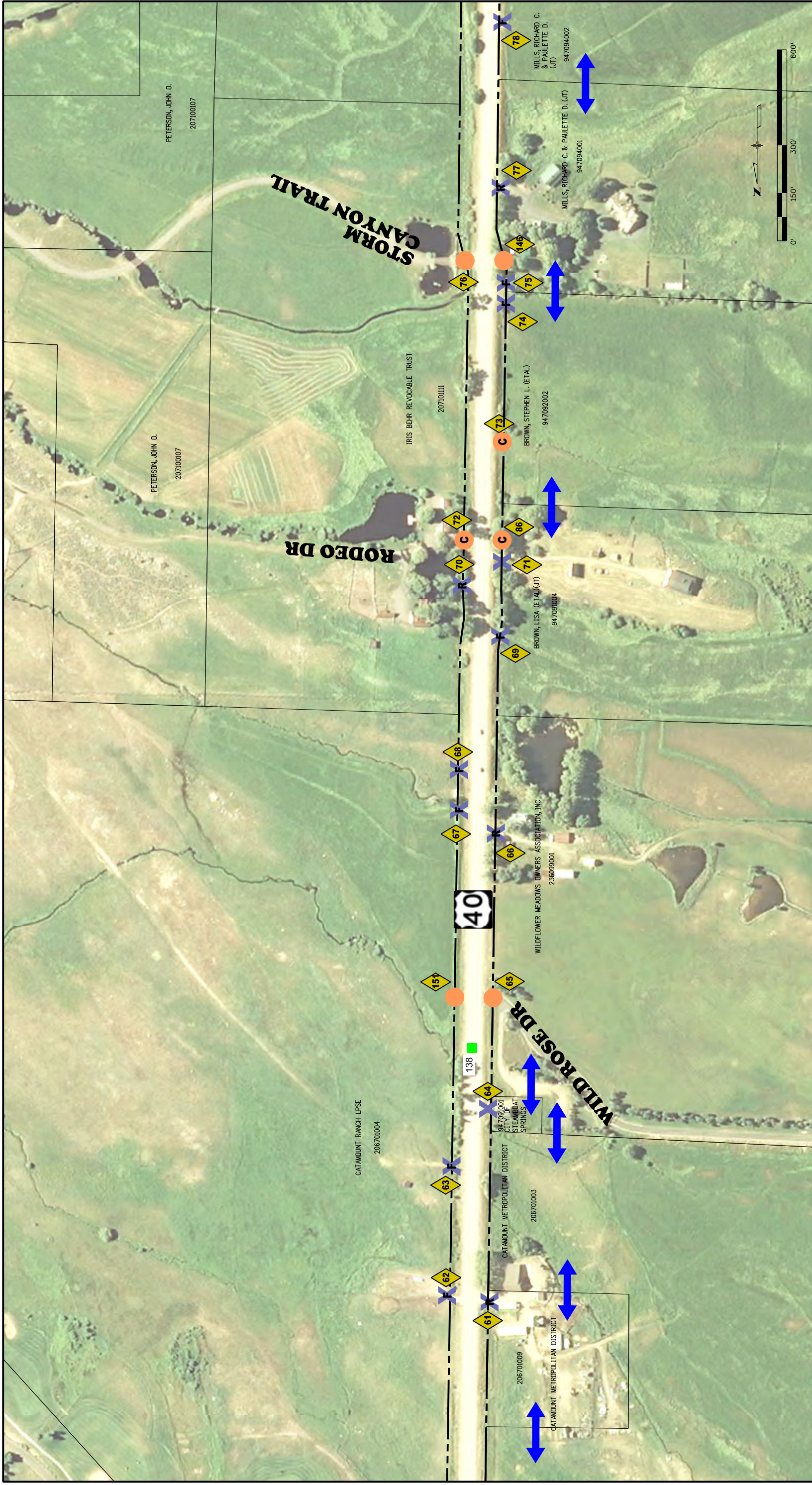
RP 135.601 TO 136.494



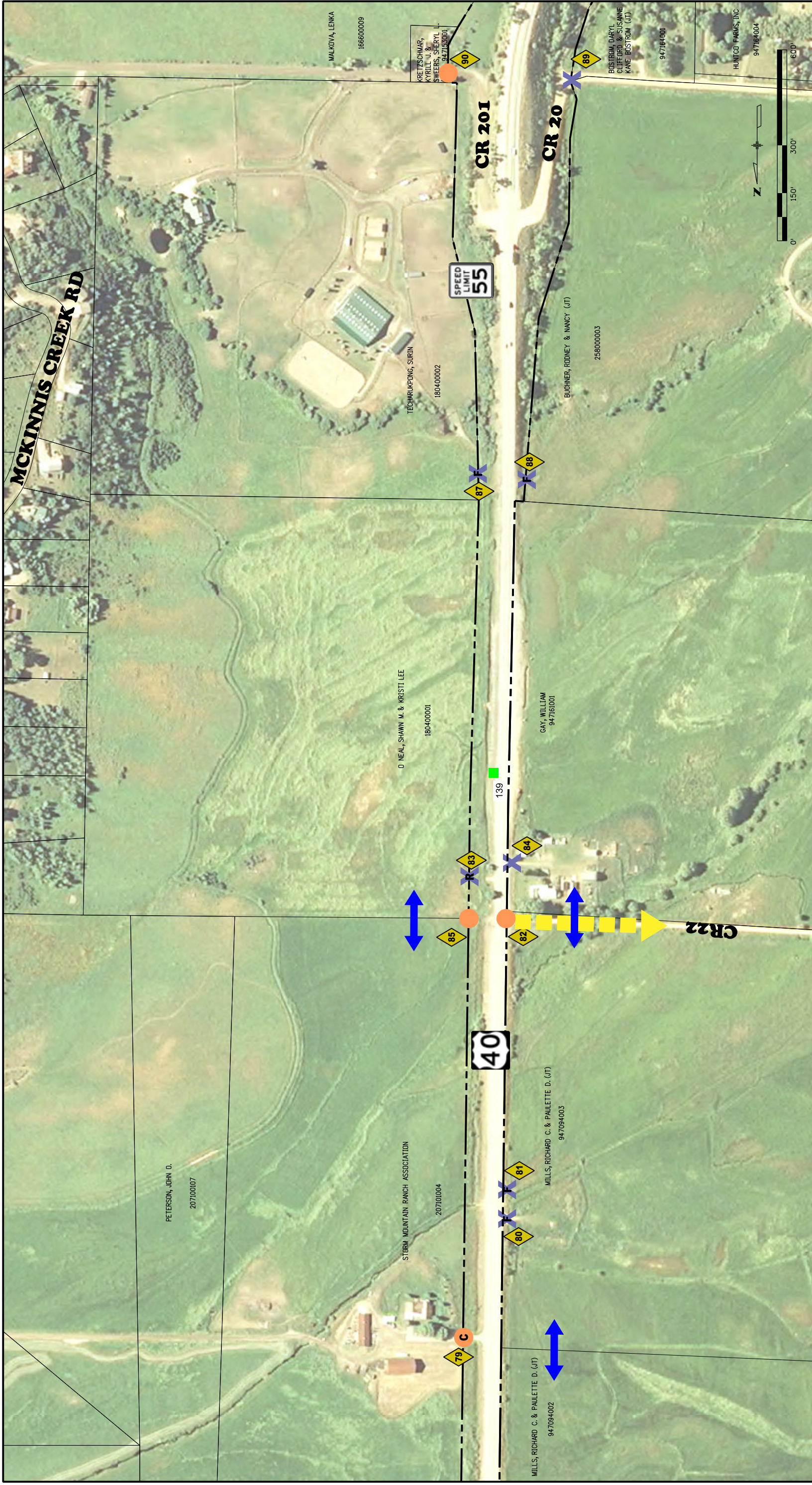
LEGEND: Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing		Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement		City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line		"C" Conditional "F" Field Access "R" Residential Access Milepost		COLORADO Department of Transportation City of Steamboat Springs ROUTT COUNTY Road & Bridge Department		US 40 ACCESS EXHIBIT 6 OF 18 RP 136.269 TO 137.035 	
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<p>LEGEND:</p> <ul style="list-style-type: none"> Yellow diamond with #: Access Point Blue star: Full Movement Green circle: One Way Full Movement Black star: Existing Pedestrian / Bicycle Crossing Blue double arrow: 3/4 Movement Left-In Black star: Right-In, Right-Out Blue star: Close Existing Access Point Red star: Emergency Access Green star: Proposed Pedestrian / Bicycle Crossing Blue double arrow: Cross Access for Shared Access Point Black star: Existing Signalized Intersection Yellow star: Alternate Route (Conceptual) Black star: Existing Access Easement 	<ul style="list-style-type: none"> Yellow line: City Boundary Blue line: Urban Growth Boundary Green line: National Forest Boundary Black line: Parcel Line Dashed line: Highway Right of Way Black line with 'A': Access Control Line 	<p>"C" Conditional</p> <ul style="list-style-type: none"> Blue line: Field Access Red line: Residential Access Green square: Milepost 	<p>US 40 ACCESS EXHIBIT 7 OF 18</p>	<p>Stolfus</p> <p>RP 136.931 TO 137.686</p>
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<p>LEGEND:</p> <ul style="list-style-type: none"> Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement 	<p>City Boundary </p> <p>Urban Growth Boundary </p> <p>National Forest Boundary </p> <p>Parcel Line </p> <p>Highway Right of Way </p> <p>Access Control Line </p>	<p>"C" Conditional</p> <p>"F" Field Access</p> <p>"R" Residential Access</p> <p> Milepost</p>	<p>CDOT </p> <p>COLORADO Department of Transportation </p> <p>City of Steamboat Springs </p> <p>ROUITT COUNTY Road & Bridge Department </p> <p>UAS </p>	<p>US 40 ACCESS EXHIBIT</p> <p>8 OF 18</p> <p>RP 137.686 TO 138.558</p> <p></p>
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US 40 ACCESS EXHIBIT 9 OF 18

LEGEND:

- ◆ Access Point
- Full Movement
- One Way Full Movement
- ▲ Existing Pedestrian / Bicycle Crossing
- ✱ 3/4 Movement Left-In
- ✱ Right-In, Right-Out
- ✱ Close Existing Access Point
- + Emergency Access
- ▲ Proposed Pedestrian / Bicycle Crossing
- ↔ Cross Access for Shared Access Point
- ↔ Existing Signalized Intersection
- ▬▬▬ Alternate Route (Conceptual)
- ▬▬▬ Existing Access Easement

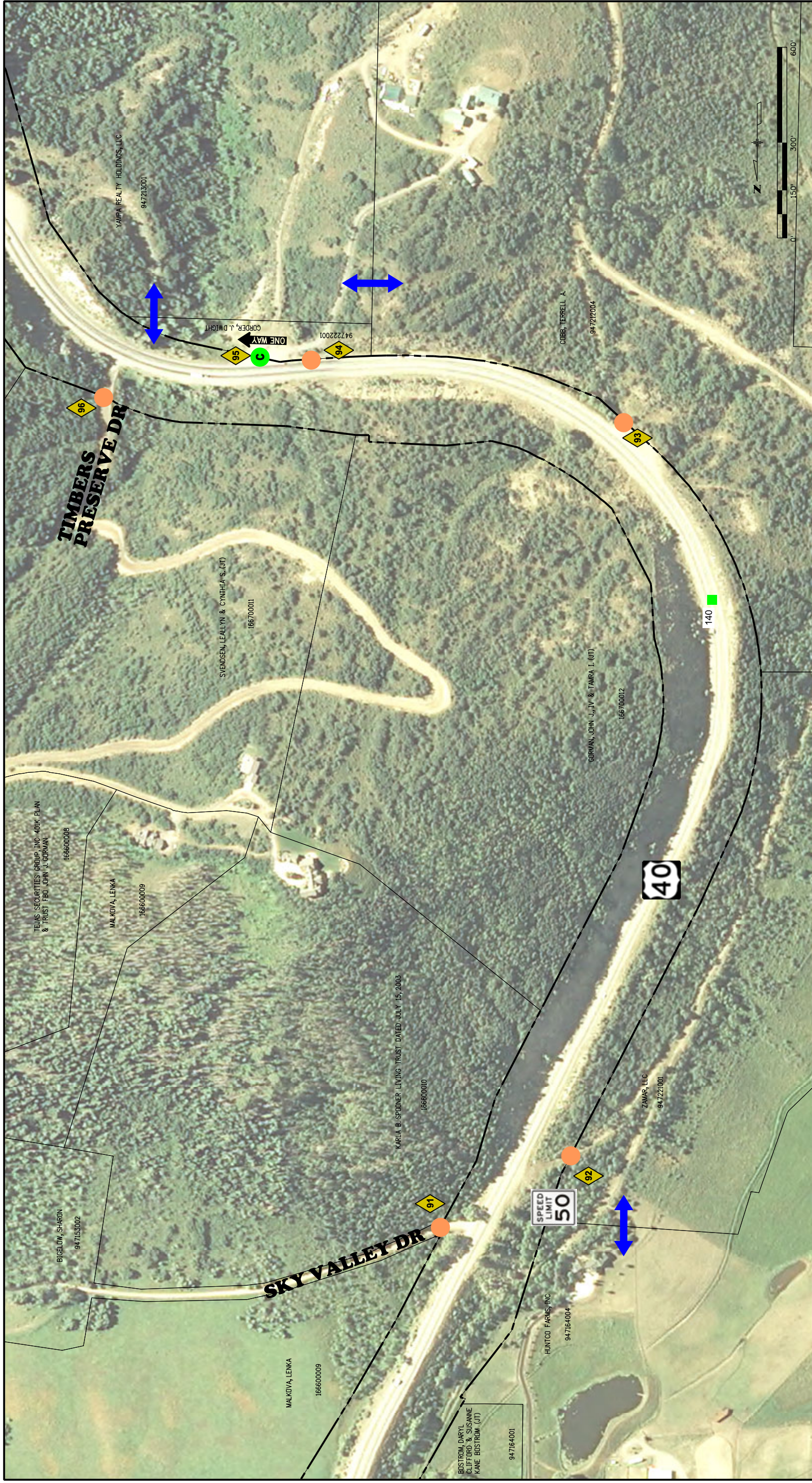
"C" Conditional

- ▬ City Boundary
- ▬ Urban Growth Boundary
- ▬ National Forest Boundary
- ▬ Parcel Line
- ▬▬▬ Highway Right of Way
- ▬▬▬ Access Control Line

"F" Field Access

- ◆ Field Access
- ◆ Residential Access
- Milepost

RP 138-558 TO 139.443



LEGEND:

- ◆ Access Point
- Full Movement
- One Way Full Movement
- ▲ Existing Pedestrian / Bicycle Crossing
- ✱ 3/4 Movement Left-In
- ✱ Right-In, Right-Out
- ✕ Close Existing Access Point
- + Emergency Access
- ➡ Proposed Pedestrian / Bicycle Crossing
- ↔ Cross Access for Shared Access Point
- 100 Existing Signalized Intersection
- Alternate Route (Conceptual)
- Existing Access Easement

"C" Conditional

- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- Highway Right of Way
- Access Control Line

"F" Field Access

- Residential Access
- Milepost

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Department of Transportation

City of Steamboat Springs

ROUITT COUNTY
Road & Bridge Department

UAS

US 40 ACCESS EXHIBIT

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RP 139.443 TO 140.556



- LEGEND:**
- Access Point
 - Full Movement
 - One Way Full Movement
 - Existing Pedestrian / Bicycle Crossing
 - 3/4 Movement Left-In
 - Right-In, Right-Out
 - Close Existing Access Point
 - Emergency Access
 - Proposed Pedestrian / Bicycle Crossing
 - Cross Access for Shared Access Point
 - Existing Signalized Intersection
 - Alternate Route (Conceptual)

- Highway Right of Way
- Access Control Line
- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- Highway Right of Way
- Access Control Line

- Conditional
- Field Access
- Residential Access
- Milepost

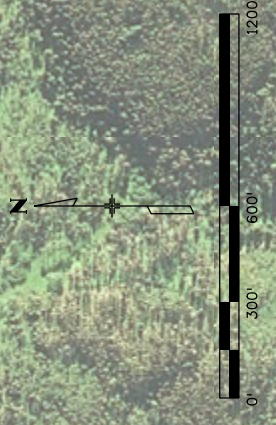


US 40 ACCESS EXHIBIT
11 OF 18

RP 140.556 TO 141.471



LEGEND: Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement		City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line		"C" Conditional "F" Field Access "R" Residential Access Milepost		COLORADO Department of Transportation City of Steamboat Springs ROUETT COUNTY Road & Bridge Department UAS		US 40 ACCESS EXHIBIT 12 OF 18 RP 141.471 TO 142.000 Stolfus	
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LEGEND:

- # Access Point
- Full Movement
- One Way Full Movement
- Existing Pedestrian / Bicycle Crossing
- 3/4 Movement Left-In
- Right-In, Right-Out
- Close Existing Access Point
- Emergency Access
- Proposed Pedestrian / Bicycle Crossing
- Cross Access for Shared Access Point
- Existing Signalized Intersection
- Alternate Route (Conceptual)
- Existing Access Easement

"C" Conditional

- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- Highway Right of Way
- Access Control Line
- "F" Field Access
- "R" Residential Access
- Milepost

CDOT
COLORADO
Department of
Transportation

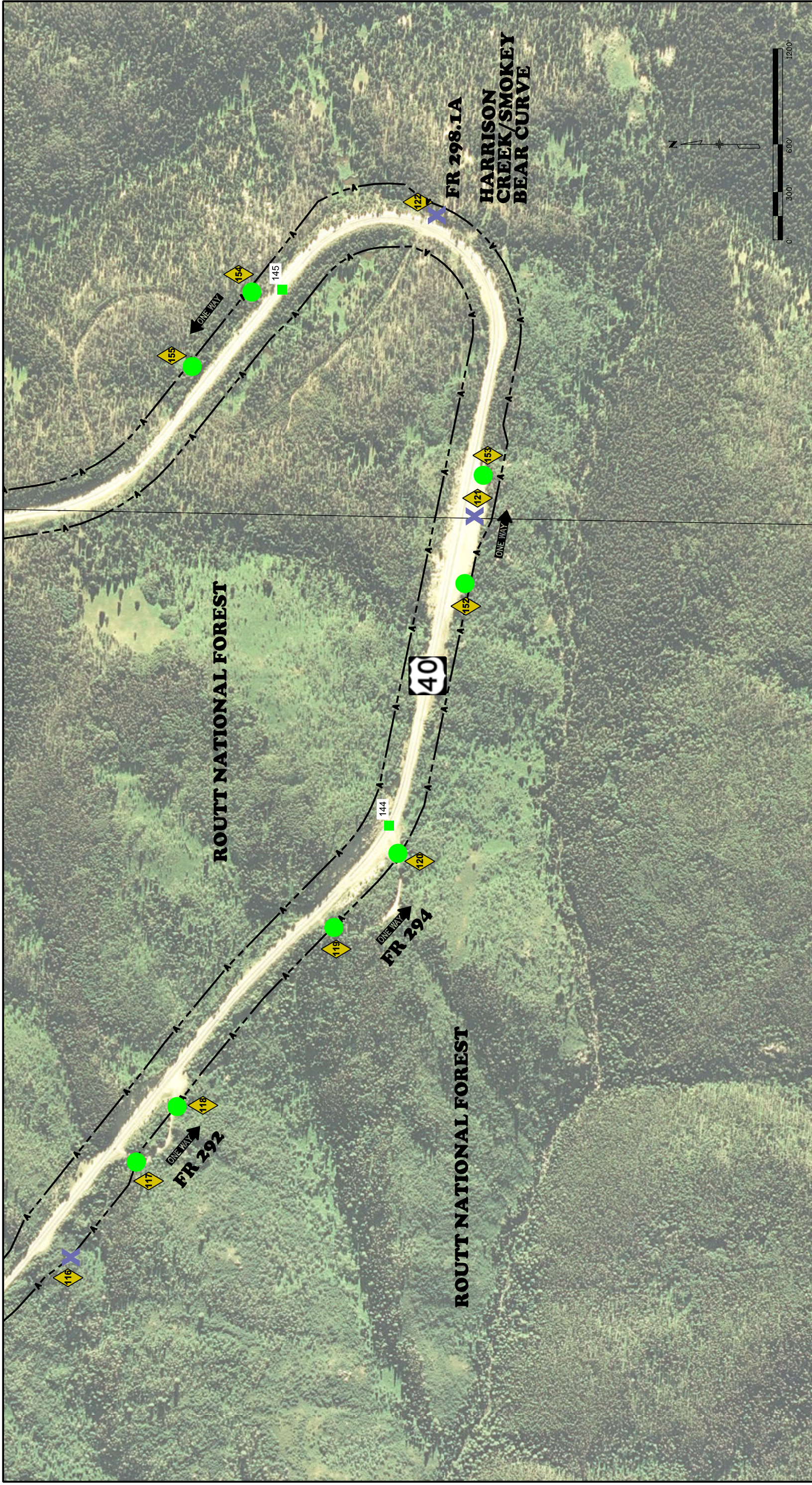
City of Steamboat Springs

ROUTT COUNTY
Road & Bridge Department

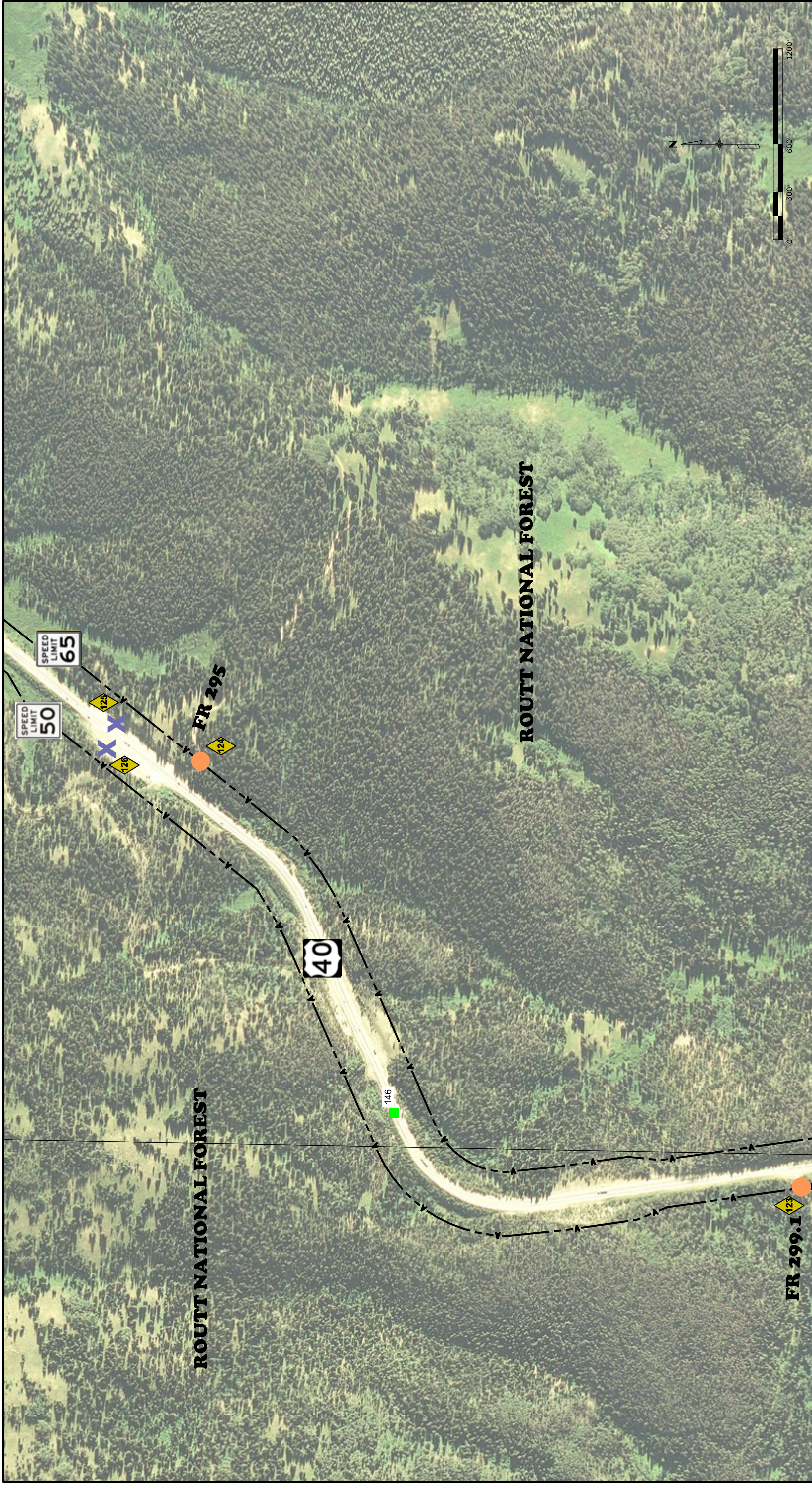
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13 OF 18

RP 141.385 TO 143.168



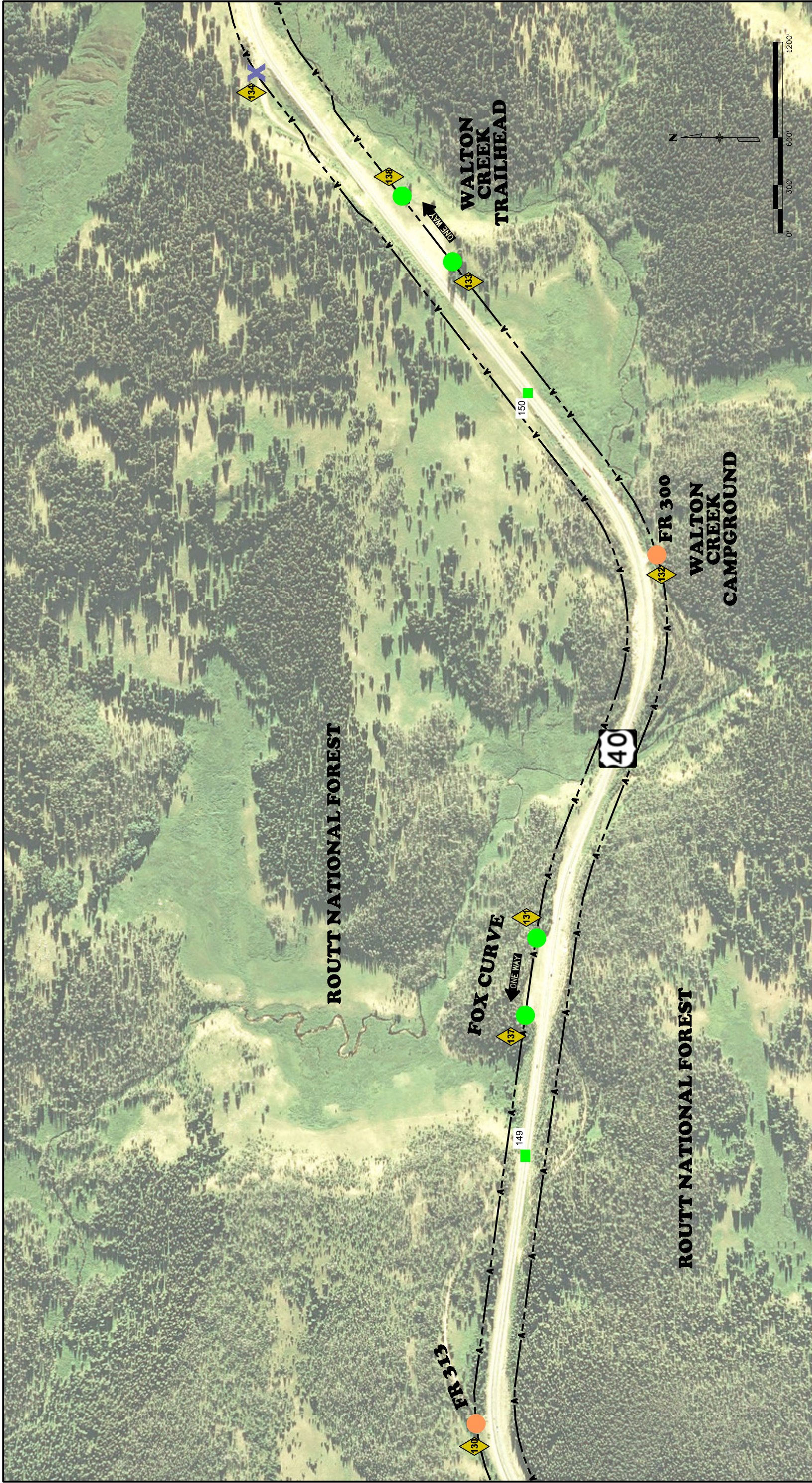
LEGEND: Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement		City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line		"C" Conditional "F" Field Access "R" Residential Access Milepost	
ROUTT NATIONAL FOREST FR 292 FR 294 FR 298.1A HARRISON CREEK/SMOKEY BEAR CURVE		US 40 ACCESS EXHIBIT 14 OF 18		COLORADO Department of Transportation City of Steamboat Springs ROUTT COUNTY Road & Bridge Department UAS Stolfus	
				RP 143.168 TO 145.426	



LEGEND: Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing		Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement		City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line		"C" Conditional "F" Field Access "R" Residential Access Milepost		COLORADO Department of Transportation City of Steamboat Springs ROUTT COUNTY Road & Bridge Department		US 40 ACCESS EXHIBIT 15 OF 18 Stolfus RP 145-426 TO 146.772	
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<p>LEGEND:</p> <ul style="list-style-type: none"> Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing Cross Access for Shared Access Point Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement 	<p>"C" Conditional</p> <ul style="list-style-type: none"> City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line 	<p>"F" Field Access</p> <ul style="list-style-type: none"> Milepost 	<p>"R" Residential Access</p>
<p>US 40 ACCESS EXHIBIT 16 OF 18</p>			
<p> </p> <p>RP 146.722 TO 148.642</p>			



LEGEND:

- Access Point
- Full Movement
- One Way Full Movement
- Existing Pedestrian / Bicycle Crossing
- 3/4 Movement Left-In
- Right-In, Right-Out
- Close Existing Access Point
- Emergency Access
- Proposed Pedestrian / Bicycle Crossing
- Cross Access for Shared Access Point
- Existing Signalized Intersection
- Alternate Route (Conceptual)
- Existing Access Easement

"C"

- City Boundary
- Urban Growth Boundary
- National Forest Boundary
- Parcel Line
- Highway Right of Way
- Access Control Line

"F"

- Field Access
- Residential Access
- Milepost

US 40 ACCESS EXHIBIT

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City of
Steamboat Springs

U.S.

ROUTT COUNTY
Road & Bridge Department

RP 148.642 TO 150.583



<p>LEGEND:</p> <ul style="list-style-type: none"> Access Point Full Movement One Way Full Movement Existing Pedestrian / Bicycle Crossing 3/4 Movement Left-In Right-In, Right-Out Close Existing Access Point Emergency Access Proposed Pedestrian / Bicycle Crossing Cross Access for Shared Access Point Existing Signalized Intersection Alternate Route (Conceptual) Existing Access Easement 	<ul style="list-style-type: none"> City Boundary Urban Growth Boundary National Forest Boundary Parcel Line Highway Right of Way Access Control Line 	<p>"C" Conditional</p> <ul style="list-style-type: none"> "F" Field Access "R" Residential Access Milepost 		<p>US 40 ACCESS EXHIBIT 18 OF 18</p> <p>RP 150,583 TO 151,695</p>
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