

# Summary of Public Comments - Issues and Concerns

## Background

On September 15, 2004 notifications were issued via news releases and on the Colorado BLM website to inform the public that the Royal Gorge Field Office beginning work on the Arkansas River Travel Management Plan (TMP) and to announce that public meetings had been scheduled to begin the scoping process. In addition to the newspaper and website notifications, letters were also mailed to approximately 150 known individuals and groups who had participated in previous travel management planning efforts.

On October 5th and 6th, public meetings were held in Canon City and Salida, respectively. The purpose of the meetings was to provide the public with an opportunity in the early stages of the planning process to assist BLM in identifying the issues and concerns that need to be addressed in the TMP. According to the registration sheets for these meetings, 76 people attended the meeting in Canon City and 59 people attended the meeting in Salida, however, unofficial head counts at both meetings indicated that more people actually attended the meetings than had signed the registration sheets.

As of December 28, 2004, the Royal Gorge Field Office has received letters and email documents from 288 individuals and organizations in response to the request for public input. Because most of the respondents expressed concerns and opinions that were shared by others, it was easily possible to segregate the respondents into seven distinctive types or groups of stakeholders based on the primary interests and concerns contained in their letters. The seven groups of stakeholders include:

**Environmental Stakeholders** - Stakeholders who are primarily concerned with protecting the natural resources, minimizing impacts on wildlife, and managing public lands for primitive and quiet uses. There were 43 respondents included in this stakeholder category. Stakeholders represented in this group included: Friends of Fourmile, The Colorado Mountain Club, San Luis Valley Ecosystem Council, Upper Arkansas and South Platte Project, Center for Native Ecosystems, Arkansas Valley Audubon Society, Environmental Action Club of Colorado College, Greater Arkansas River Nature Association (GARNA), The Wilderness Society, Rocky Mountain Recreation Initiative, The Quiet Use Coalition, The Pikes Peak Group of the Sierra Club

**Motorized Recreation Stakeholders** – Stakeholders who are primarily concerned with expanding and enhancing opportunities on public lands for motorized recreation uses. There were 106 respondents included in this stakeholder category. Stakeholders represented in this group included: Colorado Motorcycle Trail Riders Association (CMTRA), Royal Gorge ATV Club, Colorado Off Highway Vehicle Coalition (COHVCO), Colorado Association of 4Wheel Drive Clubs, Inc., Rocky Mountain Trials Association, High Rocky Riders Off Road Club, Road Bike and Dirt Bike Colorado 500 Charity Invitational Motorcycle Rides

**Non-motorized and Mechanized Recreation Stakeholders** – Stakeholders who are primarily concerned with expanding and enhancing opportunities on public lands for hiking, horseback riding, and bicycle riding. There were 120 respondents included in this stakeholder category. Stakeholders represented in this group included: Arkansas Valley Cycling Club, Chaffee County Visitors Bureau, Salida Area Parks Open Space and Trails (SPOT), Backcountry Horsemen of America, Chaffee County Running Club

**Non-Recreation Uses Stakeholders** – Stakeholders who are primarily concerned with facilitating uses that occur on public lands other than recreation uses, such as grazing, irrigation, and utility operations. There were 9 respondents included in this stakeholder category.

Stakeholders represented in this group included: The Fremont County Cattlemen's Association, Upper Arkansas Water Conservancy District

**Affected Landowners** – Stakeholders who identified themselves as owners of lands adjoining BLM lands and who are affected by activities occurring on the public lands. There were only 3 respondents who identified themselves as affected landowners.

**Government Agencies** - Stakeholders who identified themselves as representing various federal, state, county, and city agencies that are affected by activities occurring on the public lands. Only 3 letters were received from representatives of other government agencies. Stakeholders represented in this group included: City of Salida, Chaffee County Board of Commissioners, USDI Fish and Wildlife Service

**Neutral Stakeholders** - Letters were also received from 4 respondents whose comments did not reflect a strong connection with any of the above groups of stakeholders.

### Summary of Comments

The following is a summary of the public comments for each of the stakeholder groups. The group summaries are also divided into two parts. The first part is a list of the **Issues and Concerns** that were expressed by the individual respondents within the stakeholder group, and the second part is a list of the group's **Recommended Actions**.

It should be noted that some of the comments were echoed by many of the other respondents within the same stakeholder group, whereas other comments may have only been expressed by one or two respondents within the group. In those instances where the same comment has been repeated by numerous respondents it will only appear one time. Also, in order to summarize the comments into short bullet statements to reduce the size of this document, many of the comments have either been edited or paraphrased, while other statements are presented verbatim.

All stakeholders are encouraged to review these summaries and to contact the BLM if you find that a specific issue or recommendation has been omitted or inadequately described. You may do this by email at [rgfo\\_comments@blm.gov](mailto:rgfo_comments@blm.gov), or by phoning Dave Walker at 719-269-8545.

## **Environmental Stakeholders**

### **Issues and Concerns**

1. Concerned about protecting all Wilderness Study Areas and Citizens Wilderness Proposal Areas from motorized incursions
2. Opposed to any expansion of motorized and mechanized uses into roadless areas identified by the Upper Arkansas and South Platte Project
3. Supportive of limiting motorized uses in ACECs, RNAs, Colorado Natural Heritage Program Conservation Areas, and other recognized sites of biological concern
4. Supportive of maintaining conditions of the lands and resources to meet BLM public land health standards
5. Supportive of limiting recreation uses to favor protecting wildlife and wildlife habitat
6. Supportive of limiting recreation uses to favor protecting vegetation, soils, and water resources
7. Supportive of limiting recreation uses to favor maintaining natural landscapes
8. Supportive of controlling motorized access from private lands

9. Concerned about the ability of BLM to enforce off-highway vehicle restrictions and to control the proliferation of illegal routes
10. Concerned about reducing conflicts between motorized and non-motorized users
11. Concerned about the negative impacts to birds and other wildlife resulting from motorized recreation activities, including noise and increased amounts of disturbing human activity
12. Concerned about the potential degradation of environmental qualities resulting from off-highway vehicle uses, including impacts to wildlife and plant habitats, soils and water quality, and solitude
13. Concerned that greater amounts of illegal and damaging use will occur if off-highway vehicle opportunities are expanded
14. Supportive of limiting recreation uses to favor protecting federally listed endangered and threatened species
15. Concerned that there are increasingly fewer areas available to experience solitude without noise and disturbance caused by motorized recreational vehicles
16. Concerned about the degrading impacts of off-highway vehicles on landscapes and soundscapes
17. Concerned that expanding off-highway vehicle opportunities outside of a few concentrated use areas will result in expanding the impacts associated with recreational uses to larger portions of the Arkansas River Travel Management Planning area
18. Supportive of limiting recreation uses to favor maintaining wildlife habitat and landscape connectivity to avoid fragmenting areas of core wildlife habitat
19. Concerned about the potential degrading impacts to fish resulting from sediment originating from roads and trails
20. Concerned about the effects of roads and trails on wildlife, including mortality from collisions, modification of animal behavior, disruption of physical environment, alteration of chemical environment, spread of exotic species, and changes in the human use of the lands and water
21. Concerned about the increased potential for vandalism, theft, and damage to archeological and cultural sites resulting from motorized access

### **Environmental Stakeholders**

#### **Recommended Actions**

1. Avoid and eliminate motorized and mechanized recreation uses in Badger Creek, Red Gulch (Bear Mountain), and Big Hole (Texas Creek/Table Mountain)
2. Install barriers to prevent motorized incursions into Grape Creek WSA
3. Install gate near top end of Bear Gulch access road to Grape Creek WSA and limit public access to foot and horse travel only
4. Install barriers to prevent motorized incursions into McIntyre Hills WSA (Five Points Gulch)
5. Install barriers to prevent motorized incursions into Browns Canyon
6. Allow foot and horse access only in Railroad Gulch and northward to the divide with Longs Gulch (coordinate with FS)
7. Relocate mountain bike and motorized trails in Castle Gardens and Kings Canyon to protect buckwheat
8. Control uses in Longfellow Gulch to protect bighorn sheep lambing area
9. Limit motor vehicles in the Badger Creek subunit to the Sand Gulch Road and Power Line Road
10. Continue motorized closure of Bloody Gulch to protect soils, water quality, fish, and riparian communities
11. Limit motorized uses in the Texas Creek OHV area to existing boundaries
12. Increase the levels of road and trail maintenance and law enforcement in Texas Creek OHV area to limit resource damage

13. Allow no public motorized uses in the Table Mountain Roadless Area (as described in the roadless area inventory conducted by the Upper Arkansas and South Platte Project) to protect livestock, wildlife, vegetation, primitive recreation, and scientific resources
14. Disallow any proposal for a long-distance motorized trail through the Big Hole or other subunits in the planning area
15. Limit off-highway vehicles to designated routes
16. Limit mountain bikes to designated routes
17. Construct and maintain trails only with personnel who are trained in sustainable trail building techniques
18. Restrict off-highway vehicles to major existing routes only
19. Close all damaging and unnecessary routes; close duplicative, parallel and spur off-highway vehicle routes
20. Close some areas altogether to off-highway vehicles
21. Protect big horn sheep lambing areas in Longfellow Gulch by closing it to off-highway vehicles and other recreation uses during lambing season
22. Find an alternative to high school kids playing on dirt bikes on BLM lands near Salida
23. Protect bat populations in Longfellow Gulch from recreational disturbances with educational signing and protective barriers
24. Disallow motorized access to BLM from adjoining private lands
25. Protect the wildlife corridor crossing Hwy 285 south of Poncha Springs
26. Disallow off-highway vehicles in Fernleaf Gulch
27. Restrict motorcycle trials events to reduce resource damage caused by these events
28. Utilize citizen and special use volunteer groups to assist in managing off-highway vehicles, mountain biking, and non-motorized uses
29. Avoid designating any off-highway vehicle routes in a future Browns Canyon Wilderness proposal
30. Coordinate with the Forest Service in designating any routes leading to and from National Forest lands, especially at the upper end of Railroad Gulch and from Turret
31. Stop illegal motorized access from Forest Road 184 into Browns Canyon WSA
32. Do not legitimize user created routes by designating them in the travel management plan
33. Limit the distance that motorized users may travel from designated routes for purposes of camping and retrieving game
34. Protect the potential wilderness areas identified by the Central Colorado Wilderness Coalition in the Badger Creek, Browns Canyon, and Table Mountain areas
35. Clean up illegal dump sites
36. Change the OHV Open areas in Sand Gulch, Texas Creek, and Grand Canyon Hills to OHV Limited
37. Implement a monitoring program to evaluate the effectiveness of the travel management plan
38. Avoid creating "cherry stem" trails that often encourage the development of user created branches
39. Protect the eastern half of West McCoy Gulch subunit for maintaining elk habitat and migration routes
40. On travel maps, show routes that have no legal public access as being unavailable for motorized travel
41. Require the town of Salida to find motorcycle play areas off BLM lands
42. Provide adequate signage and other route information to effectively inform and educate users
43. Designate routes for off-highway vehicles only to the extent that they can be effectively monitored, maintained, and enforced within available and foreseeable levels of funding
44. Manage all forms of recreation in such a way that maintains the fundamental ecological nature and health of the land
45. Consciously plan for quiet, remoteness, and wildness to ensure that the experiential character of the landscape is maintained
46. Develop transportation plans as both travel management and recreation management plans, not just as motorized vehicle plans

47. Establish written trail objectives and desired future conditions for every designated route to assure resource protection and user satisfaction while retaining the current levels of quiet and numbers of users
48. Plan for increased numbers of users that can be expected to result from population growth
49. Base travel route designations on the spatial patterns of roads and road densities instead of basing it solely on mileage
50. Include a plan in the travel management plan for obliterating and restoring closed/excess roads
51. Only allow off-highway vehicle uses in a manner that protects natural resources, environmental values, public safety and the experience of the users
52. The travel management planning process should prescribe travel on routes that are environmentally sound, free of user conflicts, and that are manageable. Thus, in areas where designated travel routes do not exist, the analysis should begin with a blank map that does not consider existing user created routes that do not meet these criteria
53. Separate motorized and non-motorized uses as much as possible
54. Emphasize providing recreational opportunities near communities (backyard opportunities) instead of developing opportunities that will attract high numbers of users from distant population centers
55. Include management of administrative minerals (aggregate) in the travel management plan to locate and manage sources of material for maintaining roads and trails
56. Avoid motorized spurs that end in sensitive areas, such as roadless area boundaries
57. In designating travel uses, utilize demographic studies to assist in predicting the types of recreational experiences that people will be seeking in the future instead of just considering the types of recreation and travel that people are engaging in today
58. Develop a resource and recreation capacity model that establishes indicators and standards that are linked to land function and user experience
59. Consider limiting motorized access to street legal, four-wheel drive vehicles in areas where a quiet experience is the desired condition
60. Disallow exclusive private land access by signing boundaries and blocking and obliterating roads that lead from private lands
61. Do not allow any buffer off designated roads for allowing parking, camping, and game retrieval
62. Develop a program to reduce the spread of noxious weeds by recreation users
63. Ensure that the wilderness suitability of wilderness quality lands are not impaired
64. Disallow the use of any new types of recreation uses until the BLM has had the opportunity to study the effects of such uses to determine if they should be allowed or prohibited on the public lands
65. Limit off-road vehicle use and other forms of intense recreation uses in confined areas within established boundaries
66. Design and locate travel routes to minimize erosion and avoid critical ecological areas
67. Analyze the potential impacts from noncompliant (illegal) off-road vehicle use that can be expected to occur after the travel management plan is implemented
68. Consider the importance of maintaining landscape linkages for wildlife species to move between for feeding, resting, and hiding
69. Adequately consider the economic impacts of the alternatives including the costs of law enforcement, maintenance, trash removal, and monitoring resource impacts
70. Permit off-highway vehicle use only to the extent that the use is manageable
71. Analyze impacts to aquatic resources (riparian), soils, noise and air pollution, special status plants and animals, plant communities and animal habitat, and to archaeological, paleontological, and cultural resources
72. BLM should distinguish legal roads from illegal user created routes by defining a road as, "A travel route that has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road."

73. Develop a larger more visible ATV license, increase ATV license fees, and allocate a larger portion of the license fees to enforcement.
74. Convert existing two-track roads into single-track trails by placing rocks and dead trees and tree limbs to establish narrow travel ways that will eventually re-vegetate

### **Motorized Recreation Stakeholders**

#### **Issues and Concerns**

1. Supportive of expanding and enhancing motorized recreation opportunities
2. Supportive of improving safer motorized recreation experiences
3. Supportive of expanding single-track opportunities for motorcycles
4. Concerned about the potential loss of existing motorized recreation opportunities that might result from the travel management plan
5. Supportive of conducting a complete inventory of all "existing" roads and trails
6. Concerned that the travel management plan be in compliance with the provisions contained in the Multiple Use and Sustained Yield Act and the Federal Land Policy Management Act
7. Concerned about the importance of the Arkansas River travel management planning area to motorized recreation users
8. Concerned that the closures of existing motorized trails and areas will displace all users to fewer areas that will result in overcrowding and increased conflicts between various types of motorized users (4X4, ATV, motorcycle), thus increasing risks of accidents, and decreasing user satisfaction.
9. Concerned that the potential closures of existing motorized routes will reduce recreation opportunities for users with physical limitations due to age or disabilities

### **Motorized Recreation Stakeholders**

#### **Recommended Actions**

1. Expand and enhance Texas Creek OHV Area by reopening previously closed trails and constructing new single-track motorcycle and ATV trails as described in the proposal submitted by the Colorado Motorcycle Trail Riders Association
2. Preserve existing and new single-track motorcycle trails by physically barricading entry points so that they cannot be accessed by ATVs
3. Relocate trail segments out of riparian areas instead of closing trails entirely
4. Retain and develop more motorized roads and trails throughout the entire travel management planning area
5. Construct new motorized connector trails to provide loops between existing motorized roads and trails
6. Initiate meetings between private landowners and motorized recreation users to help reduce conflicts between them
7. Re-route existing trails and roads around private lands
8. Allocate more money and resources into maintaining roads and trails
9. Protect the natural resources
10. Establish small practice areas for "trials-type" motorcycle riders at Volcano Gulch, Texas Creek, and Sand Gulch
11. Allocate more funds and place higher emphasis on catching and prosecuting violators instead of taking away opportunities from legitimate users

12. Utilize existing route segments and construct some new segments to establish a long-distance multiple use trail between Parkdale and Salida for hikers, horses, bicycles, motorcycles, and ATVs (proposed Big Horn Trail)
13. Manage the area to provide as much access as possible for both motorized and non-motorized users

### **Non-Motorized and Mechanized Stakeholders**

#### **Issues and Concerns**

1. Concerned about reducing conflicts (noise and safety concerns) between motorized, mechanized, and non-motorized users
2. Supportive of managing recreation uses to protect wildlife and wildlife habitat
3. Supportive of managing recreation uses to protect vegetation, soils, and water resources
4. Concerned about maintaining opportunities for horseback riding
5. Supportive of limiting recreation uses to favor protecting federally listed endangered and threatened species
6. Supportive of preserving and expanding non-motorized trail systems around and near the town of Salida
7. Supportive of enhancing economic and social benefits (tourism) around Salida and Chaffee County
8. Concerned about ineffective enforcement of off-road use of OHVs
9. Supportive of enhancing current available trails
10. Concerned about the proliferation of user created trails Concerned about trash dumping on public lands
11. Concerned about legal access to trails from downtown Salida (will users have to cross railroad tracks to access trails?)
12. Concerned about liability to the City of Salida for trails located on city-owned property near S mountain
13. Concerned about who will maintain trail systems proposed by Arkansas Valley Cycling Club

### **Non-Motorized and Mechanized Stakeholders**

#### **Recommended Actions**

1. Limit off-highway vehicles to designated routes
2. Disallow mountain bike use in Railroad Gulch
3. Limit mountain bikes to designated routes
4. Continue to allow horseback riding in Texas Creek, Bear Gulch, Grape Creek, McIntyre Hills, Sangre Foothills, and Sunset City (Copper Gulch)
5. Close Table Mountain to off-highway vehicles and allow hiking and horseback riding only
6. Manage Badger Creek primarily as a non-motorized area
7. Develop a horse and hiking trail in East Gulch from Texas Creek to the Big Hole
8. Install BLM boundary signs on the south side of the Sunset City area (Grape Creek subunit)
9. Provide some trails for foot traffic only near Salida to eliminate potential accidents with motorized and mountain bike users
10. Develop a bicycle and hiking trail between Salida and Wellsville
11. Relocate motorized and non-motorized trails in Castle Gardens
12. Develop a non-motorized, non-fee mountain trails park for bicyclists, runners, and walkers north of Salida, near the S-Mountain area, and stretching from Dead Goat Gulch to Longfellow Gulch

13. Develop hiking and bicycle single-track loops connecting from the Power Line trail south of Salida
14. Restrict off-highway vehicles in Texas Creek to the current system of designated routes
15. Separate motorized and non-motorized users
16. Allocate the acres of land and miles of routes in proportion to the numbers of users of particular types of use
17. Comply with Public Land Health Standards
18. Provide some separate trails for mountain biking and some for horseback riding to reduce safety conflicts between bikers and horse users
19. Provide additional bicycle trails for beginner and moderately skilled riders
20. Close Castle Gardens to all motorized and mechanized uses to eliminate damage to vegetation (buckwheat)Close Railroad Gulch to motorized and mechanized uses
21. Close Longs Gulch to motorized use
22. Allow mountain biking in Longfellow Gulch with seasonal closures during bighorn sheep lambing seasons
23. Protect bat populations in Longfellow Gulch by barricading abandoned mines where they reside
24. Allow the creation of single-track non-motorized trails north of Pinion Hills and County Road 175 (Ute Trail) in the Salida subunit

### **Non-Recreation Uses Stakeholders**

#### **Issues and Concerns**

1. Concerned about protecting access to irrigation facilities for maintenance and construction of ditches and related irrigation structures
2. Concerned about maintaining access to grazing allotments for managing livestock and maintaining improvements
3. Concerned about maintaining quality big game hunting opportunities on public lands
4. Concerned about maintaining access for fire fighting and search and rescue
5. Concerned about the lack of enforcement of existing regulations to control damage by off road travel
6. Concerned about the proliferation of user created roads
7. Concerned about the lack of public education to reduce damage caused by off road travel

### **Non-Recreation Uses Stakeholders**

#### **Recommended Actions**

1. Provide alternate routes where roads have been closed to protect riparian areas so that grazing permittees can still access their grazing allotments
2. Close more roads to public motorized access
3. Address damage from motorized use by enforcement of existing rules and educating public, not by closing more roads
4. Employ more and better public education programs to reduce damage caused by off road travel
5. Include specific language in the travel management plan that will protect the rights of ditch owners to construct, operate, maintain, or enlarge any irrigation ditch as provided by law

### **Affected Landowners**

#### **Issues and Concerns**

1. Concerned about avoiding conflicts between recreation users and private landowners
2. Supportive of providing multiple use opportunities for both motorized and non-motorized recreation users

#### **Affected Landowners**

#### **Recommended Actions**

1. BLM should help with preventing trespass on private property in Sand Gulch resulting from motorized recreation uses on public lands

#### **Government Agencies**

#### **Issues and Concerns**

1. Supportive of providing multiple use opportunities for both motorized and non-motorized recreation users
2. Concerned about enhancing economic and social benefits (tourism)
3. Concerned about protecting Federally listed endangered and threatened species

#### **Government Agencies**

#### **Recommended Actions**

1. Leave current routes open to current use patterns and continued multiple use of motorized and non-motorized activities and add new routes for the use of mountain bikers and hikers
2. Develop mountain bike trails north of Salida stretching from Dead Goat Gulch to Longfellow Gulch
3. Develop a mountain bike trail from Salida to Wellsville
4. Develop a mountain bike trail along the powerline road on the south side of the Arkansas River
5. Protect federally listed endangered and threatened species

#### **Neutral Stakeholders**

#### **Issues and Concerns**

1. Concerned that public lands should be managed to benefit all users
2. Concerned that the travel management plan should be an integrated process that takes into consideration both the users and the natural resources
3. Concerned with how BLM will make decisions on trails that are not solely on BLM lands but cross onto private lands or lands administered by other agencies
4. Concerned with how BLM will complete the road and trail inventory and determine when it is completed
5. Concerned with how BLM will fund the construction, improvement, and maintenance of the trails that are included in the approved transportation system

#### **Neutral Stakeholders**

#### **Recommended Actions**

1. Create connector routes where possible to enhance the trail systems

2. Implement adequate signing and enforcement to keep travel on trails
3. Involve local clubs, groups, and interested individuals to assist in monitoring use and in maintaining the trail systems
4. Prevent motorcycles, ATVs, and 4X4 vehicles from encroaching on trails that have been traditionally used by non-motorized users
5. Implement educational signs, workshops, and brochures to gain compliance with travel restrictions
6. Involve individual users and user groups in designing trail systems

The Need for Additional Public Input from Some Stakeholder Groups The members of the BLM Travel Management Planning Team were pleased by the large numbers of responses from the Environmental, Motorized Recreation, Non-motorized/Mechanized Recreation Stakeholder groups. The Team feels confident that these groups are well-represented and that complete ranges of issues and concerns and recommendations have been identified for each of these groups. On the other hand, only a few voices were heard from those stakeholders with interests in Non-Recreation Uses, Affected Landowners, and Government Agencies and the Planning Team does not feel that the issues and concerns of these groups have been adequately identified. In order to ensure that the interests of these groups are adequately represented, the BLM Planning Team has already begun to notify known stakeholders within these groups that their assistance is needed for identifying the issues and concerns that they feel should be considered in the Arkansas River Travel Management Plan.

#### How the Stakeholder Comments will be Used

As soon as the BLM Travel Management Planning Team has adequately identified the issues and concerns of the under-represented stakeholder groups, the Planning Team will begin working on the next stage of the planning process, which is to define the goals for the travel management plan and for the individual planning area sub-units. For the Arkansas River Travel Management Plan, the goals will be written in the form of "Desired Future Conditions" (DFCs), which are brief statements that describe the physical, biological, social and management conditions that are expected to be achieved when the travel management plan has been implemented. The purpose of the DFCs is to define the kinds and amounts of activities or uses (social component) that a given land area can sustain while maintaining the area's health (physical and biological components) and complying with any special management requirements (management component) that may apply in the area. In order to ensure that the DFCs are responsive to the specific physical, biological, social, and management components of the area, it is imperative that all relative issues and concerns be considered. Therefore, the stakeholder comments are an important part of the planning process, especially for identifying social component issues, which will be considered by the Planning Team when it is drafting the DFCs for this plan. The Planning Team anticipates that the draft DFCs will be completed and made available for the public to review and comment on in a few months (April, 2005).