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RICHARD D. CIMINO
District I, Fraser 80442
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District II, Granby 80446
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District III, Kremmling 80459

E-Mail: grndcty1@co.grand.co.us
PHONE: 970/725-3100
Fax: 970/725-0565
EDWARD MOYER
County Manager
CHRISTOPHER LEAHY
County Attorney

May 25, 2021

Angela Gee, Boulder District Ranger
USDA Forest Service
Arapaho and Roosevelt National Forests & Pawnee National Grassland
2140 Yarmouth Avenue
Boulder, CO 80301
Delivered via electronic mail to: Angela.gee@usda.gov

RE: Support for additional information about re-opening National Forest Service Road 501.1 as a motorized route

Dear Ms. Gee,

Referencing the letter sent to your office April 4, 2021 by the Colorado Offroad Trail Defenders, Mile Hi Jeep Club and Rollins Pass Restoration Association, we are writing to express our support of understanding options and opening up discussions pertaining to re-opening requests of NFSR 501.1, also known as the "Boulder Wagon Road" between the Rollins/Corona Pass summit and Yankee Doodle Lake. To clarify, the exact area is currently under a year-round closure to travel by wheel-to-ground vehicles per 36 CFR 261.54a, Forest Closure Order 10-00-03: "501: Boulder Wagon from its intersection with the Rollins Pass Road at Yankee Doodle Lake west to a point 1/2 mile west of the Needle's Eye Tunnel."

At the time the James Peak Wilderness and Protection Area Act (H.R. 1576) was enacted, a corridor was created that was exempt from wilderness protection that would allow for re-connection of the Upper Corona Pass and Needles Eye areas. The Act also states that, at a County's request, the Secretary will provide technical assistance and cooperation to repair Rollins Pass road to allow two-wheel-drive vehicles travel access between CSH 119 and U.S. Hwy 40.

The Rollins Pass area has a long and storied history, and the Grand County Commissioners recognize the importance of working with a wide spectrum of groups, including but not limited to the three mentioned above, but also the Grand County Historical Association (GCHA), the Colorado State Historic Preservation Office (SHPO), Colorado Preservation, Inc., land managers, area experts, archaeologists, Boulder and Gilpin counties, and other interested parties to reach consensus.

It is the Board of County Commissioners' understanding that the Grand County Historical Association decided unanimously not to issue a letter of support regarding this proposed route as their board felt the historical significance of this proposal was being overlooked and because the area in question was located in Boulder County, not Grand County. The GCHA is a recipient of grant monies of this Board of County Commissioners and serves as a trusted advisor for—and keeper of—Grand County's rich history. The Grand County Commissioners sought to understand GCHA's apprehensions with this proposal. In response, the GCHA has relayed only their high-level

concerns, below, and this information was not intended to be comprehensive. It is also important to work with the same set of facts regarding this area. To that end, the Grand County Commissioners respectfully would like to amend the following *italicized* statements from the letter sent to the Forest Service based on information provided by the GCHA:

- 1) *"The traditional Boulder Wagon Road went straight up the ridge, but a secondary route with some additional switchbacks was built by the pipeline company to provide a gentler slope for their service trucks."*
 - a. None of these switchbacks were built by the pipeline company nor its contractors. At least one historic photograph exists and confirms the switchbacks as they appear today date to the early 1870s. High resolution imagery from the early 1950s also show these switchbacks in place before the construction and presence of a natural gas pipeline.
 - b. The *Rocky Mountain News* wrote on November 5, 1873, the wagon road "...then ascends to the top of the range by a zig-zag route..." this is in unambiguous contrast to the route running "straight up the ridge."
 - c. Points A and B are mentioned to not only correct the record and inform the Forest Service, but also to guard against the potential and sizeable loss of history should this effort proceed. The letter speaks of "possibly recontour[ing] and restor[ing]" the switchbacks that are close to 150-years-old—such restorative and/or recontouring actions must not be undertaken as these switchbacks date to the 1870s and not the 1970s as the letter states.
- 2) *"While we acknowledge that this trail was closed in the 1970s due to resource damage concerns, any damage from that time has long since been restored."*
 - a. Point 1, above, illustrates that John Quincy Adams Rollins' historic wagon road cuts from the 1870s remain visible; therefore, it seems unlikely that damage from the 1970s has been restored in the same area.
 - b. Per GCHA's records, the closure in this area described in the 1980s by the USFS, "A number of routes have developed through inappropriate use of the Rollins Pass area. Damage is now being done to fragile tundra resources by this unauthorized motorized use. Use of the West Gas Supply Company pipeline road has resulted in severe erosion of the earth cover over a 900 pound per square inch (psi) natural gas line, endangered forest visitors. These routes will be closed in order to make it difficult to use any roads except the Moffat Road and the preferred trestle closure bypass."
- 3) *"The southernmost branch is the one marked as NFSR 501.1, the main Boulder Wagon Road route. As evident from satellite imagery, that pathway is naturally reclaimed and no longer exists on the ground. The main route appears to follow NFSR 501.1B before rejoining 501.1. The route marked as 501.1A is another alternate pathway that shortcuts the broader curve. However, it appears to follow a steeper slope and is likely less sustainable. We are only requesting that one of these paths be opened to public use. The Forest Service will have to determine which pathway through this section is best."*
 - a. All pathways, while not necessarily readily visible through satellite imagery, are nonetheless still extant.
 - b. The southernmost pathway, while originating in Boulder County, does arc into Gilpin County for approximately 0.12 miles, before crossing back into Boulder County.
 - c. The proposal mentions that route 501.1A "shortcuts the broader curve... and follows a steeper slope and is likely less sustainable." This route has an average slope of ~20% and is, on average, 5% less steep than the path headed up the ridge to connect with the original railroad grade. If a 20% slope is less sustainable than other options, is a 25% slope further up this route justifiable and does the US Forest Service have any opposition to this?
 - d. While it is agreed the Forest Service will have to determine which pathway through the section is best, the Forest Service should consult archaeologists, area experts, as well as the SHPO for the preferred route.
- 4) *"[The switchbacks] are not necessary for four-wheel drive vehicles capable of climbing steep grades."* And later in the letter, *"We suggest that the most appropriate designation would be as a trail open to all vehicles, which would make it eligible for CPW OHV grants."*
 - a. Grant funding is an excellent way of preserving taxpayer funds while moving projects ahead, however such a proposed designation for all vehicles at this time seems to present more

questions than answers, particularly since the grade in this area is steeper than many of San Francisco's steep and paved streets.

- 5) *"We see reopening the Boulder Wagon Road as requiring little more than some paperwork by the Forest Service...."* and a few paragraphs later in the letter, *"The Forest Service would only have to perform the requisite level of environmental analysis (likely an EA) to designate this road as a route open to motorized use under the Forest's travel management plan."*
 - a. Grand County recognizes this this must undergo both NEPA and NHPA, typically involved and deliberate processes. To that end, Grand County offers the suggestion that both NEPA and NHPA requirements could potentially be aided by partnering with local preservation commissions recognized as Certified Local Governments, particularly those of Boulder and Gilpin counties, as the best source for information on eligible and potentially eligible historic and prehistoric properties on Rollins Pass. This is of acute importance because this route on Rollins Pass is located in Boulder County and will require access through Gilpin County should a complete route over the pass be reestablished.
- 6) *"Note that the legislation that designated these Wilderness Areas specifically cherry-stemmed the Boulder Wagon Road to allow for continued motorized use of this route."*
 - a. The James Peak Wilderness Act does allow for a motorized corridor, despite no motorized route currently connecting over the Continental Divide per Motor Vehicle Use Maps (MVUMs); however, an assumption is made here that the Indian Peaks Wilderness allows for public motorized use over Guinn Mountain. This route serves as the right-of-way for the pipeline and has been closed for 40 years. Lack of a wilderness designation in an area need not imply permissive motorized use, perhaps only bicycle traffic. This is something the Forest Service must elaborate on and clarify.
- 7) While the letter appears to have been sent on behalf of the Rollins Pass Restoration Association, the Rollins Pass Restoration Association's president, S. Eckhardt, mentioned in a Facebook post of this proposal, "...I apologize for this surprisingly untimely mention of our organization's inclusion and cooperation with this proposal. The RPRA Board isn't sure our Bylaws will even allow such a risky venture that doesn't include the Needles Eye Tunnel...."

Related to this proposal, the Grand County Commissioners have the following questions for the US Forest Service and other parties should this process proceed with the route being considered as a thoroughfare:

- What will be the service level for a motorized route over NFSR 501.1?
 - The James Peak Wilderness Act clearly calls for a road meeting a two-wheel drive standard. The costs, in dollars, time, and environmental impact, for this level of road are high. Some off-road advocates have shown interest in a more rustic road. Yet, the Act is clear on the standard of road required. How can this particular conflict be solved and who will pay to keep it at that level of service?
 - The proposal for re-opening appears to wrestle with this challenge as well: establishing a motorized route over Guinn Mountain does not satisfy the legislation as it seems unlikely that two-wheel drive vehicles could safely ascend and descend such a steep and loose slope.
- What will be the alignment for the road?
- Questions related to safeguards:
 - This pipeline appears to cross the projected uphill route at least nine times; what can be done to minimize impact to this vital conduit should this route be opened?
 - What safeguards can be put into place in this area to arrest out of control vehicles? Assuming a frictionless environment, a vehicle on a 1000-foot incline can achieve speeds of 171 MPH in 32 seconds as compared with the traditional Moffat Road route where the same distance would take 6.5 minutes for a 2% grade or 3.25 minutes for a 4% grade to achieve the same velocity.
 - The RPRA, above, called this a 'risky proposal'—what other risks exist with this plan as seen by the Forest Service and what can be done to alleviate these risks?
- What level of environmental analysis is required and who would pay for this analysis?
- Who would be considered consulting parties?
- How will the character-defining features of the National Register of Historic Places' *"Rollinsville and Middle Park Wagon Road"* be retained?

- How will the wagon road cribbing dating to at least the 1880s (if not earlier) be preserved and protected?
- Without diving into specifics, how will both wagon road and Native American artifacts in this area be studied in situ by professional archaeologists before a route is considered through this area?
- Where will interpretive signage be placed?
- Has this route ever been fully opened as a throughfare to automobile traffic?
- Grand County wishes to prioritize motorsports in this area and some in the offroading community have mentioned that a complete thoroughfare would necessitate an east-to-west flow only to ease congestion; this could have impacts on Grand County tourism should a plan be adopted as the route could not be used in the summer for Grand Adventures tours that start in Grand County and head east towards the summit. What recommendations can the US Forest Service offer to all counties for east-to-west, west-to-east, and/or bi-directional traffic flows?

Grand County is a community comprised of outdoor enthusiasts who value wildlife conservation and natural landscape preservation. As a County with 416 square miles of wilderness, we have witnessed that lack of a motorized access trail through accessible forest lands often leads to misuse and ad hoc trail creation. Indeed, to the detriment of the James Peak Wilderness and Protection Areas, due to lack of a road for motorized use, users are charting and creating their own trails, at times across the venerable trestles that have been closed for well over a generation. What can be done to both ensure safe motorized access while safeguarding history?

The commissioners would like to visit this site in the summer or early autumn to gain a better understanding of the ask to the US Forest Service and the viability of each option. It is for these reasons we fully support seeking additional information about the potential re-opening of the Boulder Wagon Road.

Sincerely,



Merrit Linke
Commissioner Chair



Richard Cimino
Commissioner



Kristen Manguso
Commissioner

Grand County BOCC / B. Travis Wright

Cc: Monte Williams at monte.williams@usda.gov
 Kevin Shea at kevin.shea@usda.gov
 Patricia Hesch at patricia.hesch@usda.gov
 Reid Armstrong at Katherine.armstrong@usda.gov
 Shoshana Cooper at shoshana.cooper@usda.gov
 Gilpin County Board of County Commissioners at wsill@gilpincounty.org, lisenhart@gilpincounty.org,
shollingsworth@gilpincounty.org, scate@gilpincounty.org
 Boulder County Board of County Commissioners at ravaldez@bouldercounty.org,
commissioners@bouldercounty.org