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Pike & San Isabel National Forests, Cimarron and  
Comanche National Grasslands  
2840 Kachina Drive  
Pueblo, Co 81008

January 30, 2008

Subject Forest Plan Revision and Travel Management Plans (TMP)

Dear Supervisor Leaverton:

This is an update of a letter to you and your staff of February 2007, and the announcement of a new organization that is interested in working with you on motorized trail opportunities. I also wanted you to know that the overall issues discussed in 2007 are still valid and important for your forest and travel planning in 2008 and beyond.

The Trails Preservation Alliance is the new trail, non-profit partner of the Colorado 500, a Colorado based off road charity motorcycle organization that has been working with the FS and BLM for over 35 years. Our primary goal is to establish responsible single track recreation in the National Forest. We have donated countless hours of volunteer labor towards this goal, and generated over \$600K worth of trail grant funding for maintenance of motorized single track trails. We have also been actively involved in the forest planning and TMP's for the RGNF, WRNF, GMUG and GNF.

We would like to provide you and your revision staff with comments that we think are important for you to consider in the new forest plan and subsequent travel management plans. The majority of these topics has also been discussed with the forest supervisors in the WR, GMUG and the GNF, during their forest planning and travel management processes. In addition we have also included some site specific recommendations for your revision staff to consider in the PSI forest plan and TMP's.

**Comments for the staff to consider:**

The 1984 PSI Forest Plan and FEIS, did not address the demographics of OHV recreation that you are encountering today. The recreation use estimates did not foresee the large increase in motorized recreation. With this in mind, the current forest plan does not adequately address the new characteristics of OHV recreation and its users. This is a changed condition since the Plan and projections and alternatives need to be updated. The new forest plan must consider the demographics that indicate motorized recreation is increasing and will double within the next six years. This combined with the aging population of the public, large increases in all types of OHV sales and less free time from work for recreation, all point to an increase in OHV recreation demands.

We strongly suggest that the new forest plan provide sufficient areas and designate route systems for this type of recreation. Complete areas of the SI NF were designated non-



motorized, yet looking at them today in light of new motorized recreation demands may indicate the need to re-open some of these areas and make them available for motorized recreation opportunities.

The 1984 Forest Plan identified and used the ROS (Recreation Opportunity Spectrum) to map and classify recreation settings forest-wide, including the National Grasslands. The issues then, as today, included the need to maintain a balance of both motorized and non-motorized recreation opportunities. The Plan and FEIS identified about 20% of the forest open to motorized use in the semi-primitive setting, or about 23% of the Forest and Grasslands outside of Wilderness. The Forest Plan indicated increased roading in support of the timber program during the life of the plan. The Plan also identified additional wilderness suitability areas including the Sangre de Cristo's, Green Mountains, Spanish Peaks, Buffalo Peaks, and Lost Creek areas.

In the intervening 24 years, much new wilderness has been legislated on the Forest and much of the anticipated new roads for the timber program that might have benefited recreational riding were never constructed. In addition, many of the forest recreation settings and accesses have changed to the roaded-natural and rural setting categories as a result of community and mountain home subdivision developments.

As a result we feel there has been a shrinkage of the of semi-primitive, motorized trail opportunities that we prefer and were provided for in the selected alternative. Increased blocked access and lack of replacement rights-of-way to public lands has compounded the problem and resulted in substantial loss of opportunity for motorized recreation. Roaded-natural settings provide opportunities for connecting routes and loops for motorized recreation; however, the real quality experiences are in the primitive and semi-primitive end of the spectrum for motorized recreationists, too. We are also deeply concerned about how the Colorado Roadless Area planning rules will further impinge on motorized opportunities

The Forest planning team needs to reapply the ROS inventory process to identify recreation areas, routes and mileage opportunities to assure that a fair balance is achieved with non-motorized demands in similar recreation settings.

All user, groups, motorized or non motorized will need to become more tolerant of each other in the future. There is only so much space available for everyone's use. Multi use trails and dispersion are the best solution to user conflicts. We are available to help convene a collaborative working group if necessary.

Those that cannot be tolerant of motorized or mechanized travel need to go into the wilderness areas. We absolutely feel that the wilderness areas in the PSINF are under utilized for any type of recreation. The Lost Creek area is a prime example.



The PSI NF does not need any more designated wilderness areas. Instead we suggest that areas be designated backcountry non motorized and backcountry motorized. This will allow for more management flexibility and success in providing a balanced set of recreation use opportunities.

As for the Browns Canyon Wilderness proposal, WE DO NOT SUPPORT THIS ACTION. There is no need for a wilderness designation in this area. We understand that it is just another effort to eliminate OHV recreation. We are extremely opposed to this proposal and adamant about the need to keep this area available for motorized use.

We are aware of some areas of resource impacts from renegade riders and subdivision users, but we think the Forest Service concern for user developed trails and roads has been overstated as a major problem on the PSINF. It is our opinion there are some cases of this, but as a whole the PPSI does not have a major problem with this issue. We base this opinion on our observations as we have ridden most areas that are open for OHV recreation. In cases where user developed trails have appeared we think this is a result of existing trails being closed to motorized recreation, that use to be open. The Salida District is a good example of this. Only one trail remains open in that area, where in the past many trails were listed as “multi use” trails.

If you look at the history of the past 20 years of the Colorado National Forest Plans/Travel Management Plans, you can see that during each cycle, more and more motorized recreation areas have been closed (single track, 2 track and 4WD). You combine this with the explosive growth in sales and OHV recreation demands, this demonstrates that the FS has not been meeting the recreation demands of a significant percentage of the Colorado public and its visitors. We hope the instructions to your planning staff for this planning cycle will update and more directly address this issue. There is documented evidence that more OHV recreation areas and designated routes need to be developed. The TPA, COHVCO and many local motorcycle clubs are available to help your staff in identifying previous and new OHV recreation trails.

The CREST TRAIL. This trail has been historically a multi use trail. But now it is on the proposed GNF TMP plan to be closed to motorized use, and re-established for non-motorized use. If this occurs, it will close off 18 other miles of motorized trails in that area. Some of this route is in the PSI, and some of it in the GNF with access to the Rio Grande National Forest. We recommend a close coordination effort between adjoining FS units to help build and maintain a motorized transportation system for OHV recreation in this historic use area. The TPA and COHVCO have been in contact with the Continental Divide National Scenic Trail (CDNST) organization (CDTA), and currently have an agreement to investigate a possible re-route of the Crest Trail, one would be non-motorized and the existing trail would remain multiple use. The Gunnison National Forest and the Regional Office are aware of this effort.

The Hayman fire destroyed a significant amount of OHV recreation areas. To date, many of these areas have not been reopened for OHV use, nor has the FS designated any new areas to offset the Hayman fire reduction in OHV recreation. A mile for mile replacement is in order or reopening of the entire Hayman fire for motorized route designation is certainly an urgent need.

The PSI forest plan should review, evaluate and accept user developed single track and two track recreation routes. These combined with old logging roads and RS2477 routes provide a viable solution for the forest plan to consider for OHV recreation. The majority of these routes have been developed out of user need or reclaimed from historic use due to delays in the planning process and lack of response to provide adequate OHV routes. This is very apparent in the SI NF area specifically from Salida to Fairplay. We strongly suggest that these user developed trails and historic logging and RS2477 routes be given a fair evaluation for inclusion in the final forest plan and TMP. Examples of this are available during further discussions.

Building new trails is not always necessary. There are sufficient user developed routes to be included in the TMP along with allowing old logging/mining roads and 4wd roads to degrade into single track/2 track trails. This, with a designation of multi-use will go a long way in meeting motorized recreation demands.

Budget constraints for the FS are understood by all, this includes building new trails, maintenance and enforcement. I think you will find that education, along with well designed, signed, mapped and maintained trails will reduce your cost of enforcement. Our organizations are always ready to cooperate with volunteers and funding.

#### **Site Specific Recommendations:**

The Pikes Peak area (south of Hwy 24) does not need any more motorized routes developed. There are several RS 2477 4wd roads south of the Gold Camp road that should be open for motorized use. WE DO NOT SUPPORT THE RING THE PEAK TRAIL SYSTEM. The current RTP utilizes several of the very few motorized single track trails; we are concerned that the RTP will cause conflict if allowed to proceed with the current plans.

The 717 Trail system, NW out of Woodland Park, should be maintained in its current configuration, along with opening of the Hayman fire area closures, or replaced with new OHV areas and routes that will allow OHV recreation from Woodland Park to the west side of the Platte River.

The west side of the Platte River (to the Lost Creek Wilderness) has OHV opportunities that need to be evaluated and open for OHV recreation. This includes old RS 2477 routes, and user developed routes. In years past, this area was open for OHV recreation but is now closed, which causes significant issues with the OHV community.



The Rampart Range trail system, (SW of Denver) needs to be maintained in its current configuration, along with opening the areas that were closed by the Hayman fire.

The entire SI NF has significant OHV recreation opportunities that have either been overlooked or closed for OHV recreation.. This includes the areas from Salida to Fairplay. The PSI plan and TMP has the opportunity to open this area, to reduce over use of the few areas that are currently open. Enlarging and dispersion of OHV recreation areas will greatly reduce user group conflicts in this prime OHV area.

The Rainbow Trail, one of the most popular single track motorized trails in Colorado, needs to be expanded to provide a complete loop for both the east and west side of the mountain range. This will require opening an OHV route near Westcliffe that allows east/west travel. This would provide a complete loop system from Poncha Pass to Salida, to Westcliffe, to Villa Grove (over Hayden Pass) or continue to the Poncha pass intersection with the Rainbow trail. This will not require any building of new trails. OHV routes area already on the ground ready to use.

These are only a few of the site specific suggestions for the PSI revision staff to consider. I would be glad to meet with you and your staff to consider other OHV recreation possibilities and help coordinate other motorized recreation groups. We have the capability to work with the FS for any GIS/GPS data that may be required to provide more OHV recreation opportunities. We look forward to working with the revision staff towards the goal of equal recreation opportunities for all user groups.

The new PSI forest plan revision process and TMP is a great opportunity to update OHV recreation opportunities that were not known or adequately address in the 1984 forest plan. We hope the revision staff will accept this challenge and make every effort to provide meaningful and adequate OHV recreation opportunities in the PSI Forests.

The Trails Preservation Alliance and COHVCO are available for discussions and planning coordination on any of the above issues and suggestions.

Sincerely,

Don Riggle  
Director of Operations  
Colorado 500 and the Trails Preservation Alliance

CC; PSI Revision staff, Pikes Peak DR, Jim Bensberg, El Paso County Commissioner, Steve Sherwood R2,, Salida DR, Fairplay DR, Leadville DR, COHVCO file, BRC file, TPA File,