



BLM GJFO RMP
2815 H Rd.
Grand Junction CO 81506

1/5/2009

Dear ID team:

The following are the scoping comments for the Grand Junction Field Office Resource Management Plan as presented by the Trails Preservation Alliance (TPA) and the Colorado off Highway Vehicle Coalition (COHVCO). These two organizations represent over 200,000 off road vehicle user in Colorado. We look forward to working with the GJFO on the RMP.

General Comments

We would like the GJFO to make finishing the implementation of the plans already completed the highest priority in the RMP.

For example, the North Fruita Desert Plan is finished, yet several trails that were analyzed and approved in the Plan have not been built. The upgrade of existing trails to the standards that were approved in the Plan has not been done.

The Bangs Canyon SRMA Plan is finished and the trails approved, but again, the implementation is incomplete. The community has a vested interest in the completion of this trail system. We encourage GJFO to work co-operatively with TPA and other interested partners to secure funding and any other support necessary to construct these important recreation assets.

We would very much like to see the GJFO finish the Gateway Plan, and not do it as part of the RMP. The Gateway resort and surrounding BLM lands have been discovered by the public. It is unrealistic to ignore the Gateway area for the several years it will take to complete the RMP. Perhaps the Gateway Plan could be completed concurrently with the RMP, so that implementation can begin as soon as possible.

Travel Management

It is unreasonable to expect the GJFO to maintain a signed and patrolled designated route system covering over one million acres for the indefinite future. The public is better served to have GJFO prioritize its resources in high use areas (SRMA's) and leave the remaining land to custodial management as instructed in the planning handbook.

We think the direction being taken by the Wyoming state office is a far more achievable approach. Wyoming is doing detailed route inventory and evaluation in SRMA's. The travel management implementation, using signs, maps, and other visitor amenities will be fully accomplished in those areas, and in all other parts of the Field Offices travel will be limited to



existing routes as defined by the inventory. We think this is a realistic way to address the expected scarcity of agency resources.

We think that the RMP process should reconsider the substantial costs of completing some of the earlier and somewhat unrealistic plans, such as the Grand Mesa Slopes and north DeBeque (Garfield County). These already have designated routes as their travel management prescription, yet the BLM has been unable to implement them. None of these areas have recognizable designated routes. Maps and signs have not been provided to guide the public. These areas receive light visitor use and are some distance from the population center. No interested partner has stepped forward to help the BLM implement either of these plans. In other words, the public has little interest in these particular management areas.

The GJFO might consider that because these areas receive light visitor use and there are no agency partners to help, the need and cost of analyzing and designating the routes, then maintaining, patrolling, signing and mapping the system, may not be the best use of the agency's limited resources. Those agency resources could be better used in the SRMA's that are closer to the population centers, such as Bangs Canyon and the North Fruita Desert. Changing that allocation of agency resources can be done in the RMP.

In other words, we would encourage the GJFO to reduce the scope of the tasks it sets for itself, instead of increasing its workload to the point where none of the RMP goals can be achieved.

Wild and Scenic Rivers

We are strongly opposed to the consideration of the Delores River and any of its tributaries for consideration as Wild and Scenic Rivers. It was not eligible in the last review, and nothing has changed to make it eligible now. The Delores is not free flowing. The flow is determined by the irrigation needs of downstream agriculture. This is not to imply that it is without value as a recreation and scenic resource. What we object to is the imposition of land use restrictions similar to those of designated Wilderness without Congressional approval. This may be the case if the subjective measure of "Outstanding Remarkable Values" is being used to determine the suitability of the Delores

Our sentiments are the same for every new W&S river nomination: None were eligible in the last review, and nothing has changed to make them eligible now.

Heritage Areas

The designation of Heritage Areas is a new and unprecedented expansion of agency authority. There is no statutory or executive authority for such a designation. This new designation implies a new category of use limitations and restrictions, and the material supplied by the GJFO does not answer that implication. We hope this new restriction on public access is dropped from



consideration in all alternatives. Cultural resources are already protected by the Archeological Resources Protection Act. We see no need for a local designation that would add yet another layer of land use restrictions.

The descriptions of the Heritage Area locations seem to coincide with the presence of T&E plants. We can see no rational connection. Like cultural resources, rare plants already have protection.

In what we are sure is an oversight: The Tabaguache Trail has not been shown on the cultural map as an historic route.

Back Country Byways

We would like to recommend the designation of two new back country byways. The designations will direct attention to the outstanding recreation experiences as well as facilitate funding opportunities from federal, state and outside sources.

The two byways are the Tabaguache Trail and the Gateway Byway. The Tabaguache Trail is the present alignment (modified to include the new connector segment). The Gateway Byway would include the Niche Road (Mesa County 6.3) and the John Brown Road to the Utah border.

Dominguez Canyon WSA

We strongly object to the expansion of wilderness designation beyond the present WSA boundaries. Any change in the presently prescribed allocation of motorized and non motorized uses would not be in the best interests of the community. Motorized intrusions into the WSA in its present form are rare. Changing the boundaries would create new and un-necessary expansion of restrictive regulations. Wilderness values are presently well protected.

North Desert/ Bookcliffs

This area reaches from the Utah border to Mt. Garfield and from Interstate 70 to the northern border of the FO.

Beginning at the east: A network of single-track trails exists along the Utah border west of Prairie Canyon Rd. The trails extend across the border into the Moab Field office. Moab has chosen to ignore the existence of these routes in their recently signed RMP. We want the GJFO to include these trails in the designated route system and to work with the Moab FO in an effort to designate the portion of the network that is in their jurisdiction.

Colorado State Parks maintains a high quality camping facility at Highline Lake. These facilities are busy in the summer when water sports are popular, but they are not busy in fall and spring when the North Fruita Desert SRMA has its highest use time. Legal motorized / mountain bike



access from the Highline Lake campgrounds is not presently possible. Only a short section of a route that already exists needs to be designated as a trail to accomplish this goal. We would like to have GJFO work co-operatively with Colorado State Parks to remedy this situation.

North Fruita Desert is a good example of shared use motorized/ non- motorized recreation as described in the plan. The only problem is that not all of the development and trail upgrades have been accomplished. We would like to see the remainder of the motorized trails constructed and the upgrades to current standards be applied to all trails as described in the plan. Specifically, we would like to see the motorized trail in Lippan Wash and the new trail that will parallel V.8 Rd. constructed. Finishing the implementation of existing plans is an RMP- level decision.

The extension of 21 Road, Hunter Canyon, is a popular area for rock crawling. The fact that it changes each year with the rock obstacles moving about as a result of the seasonal flows is an added attraction. Suitable access agreement should be made between GJFO and the legitimate rights of the private in-holder.

Moving east, the area between 21 Road and 27 ¼ Road should remain an ERMA and custodial management applied to the existing trail and road network.

The Grand Valley Open Area extends east from 27 ¼ Rd. to Mt. Garfield. This area is highly valued by hundreds of thousands of local visitors, and thousands more out-of-region and out-of-state visitors during the winter months. It functions well for its intended purpose.

We want to see that area continue as it is presently designated, which we understand, to be open to cross-country travel east of 27-1/4 Road, and limited to existing routes west of 27-1/4 Road. More signs to inform the visitors that this is the rule would be appreciated. The reason we ask for that is because the installation of the two kiosks in the last three years has helped to reduce the cross-country travel on the west side of 27-1/4 Road. This shows that people will follow the rules when they know what the rules are. We would also like to point out that the signs are not vandalized.

An even more effective improvement would be a fence on the west side of 27-1/4 Road, with clearly defined entry points. At the entry points, we would like signs that tell people what the rules are.

Considering the huge visitor numbers this area receives, the absence of any amenities whatsoever seems irresponsible.

We realize that many people access these areas who are not “recreationists,” and this makes providing sanitation and interpretive and regulatory signing difficult to maintain. However, if the amenities are placed further north on 27-1/4 Road, we feel that BLM visitor compliance would improve and enforcement would be easier.



The two shooting ranges are important recreational assets in the Grand Valley. We appreciate the work that BLM and its volunteers have accomplished to improve these sites. We would like to see the ranges continue to be maintained to safe and sanitary standards.

DeBeque

The area south and west of DeBeque presently sees little recreation pressure. The natural gas industry has a large presence with many wells, pipelines and roads. The terrain remains visually very exciting with cliffs and washes that offer extraordinary desert scenery. A system of single-track trails connects many of the gas industry roads with quality trail opportunities and access to the washes and slick rock. We would like to have these trails designated as single-track motorcycle and mountain bike trails. Little infrastructure is necessary due to the present level of use. It is foreseeable that additional recreation pressure and the growth of the town of DeBeque, over the life of the RMP may have impacts on the area. An improved partnership with the town and the energy companies would be a feasible source of support for trail and infrastructure development in the future.

Bangs Canyon SRMA

The Bangs Canyon SRMA is a project in progress. We at TPA hope to be able to further our partnership in order to assist GJFO in the successful completion of the trails and infrastructure in Bangs. To that end, we offer to help secure financial and in kind support for this project. It is important that the internal GJFO resources and priorities be focused on accomplishing the goals set out in previous decision before new projects are undertaken. Prioritization for implementation of existing plans is an RMP level decision

Cactus Park/ Dominguez Canyon WSA

Cactus Park is adjacent to the Bangs Canyon SRMA, the Dominguez WSA and the Uncompaghre NF. The existing system of travel routes serves the ATV and 4X4 communities well. The Tabaguache Trail also goes through the area. Dispersed camping and wood gathering has left a poor imprint on the vegetation and routes. Designation of the existing through routes and the establishment of a developed campground will go a long way to reduce the impacts and retain the recreation opportunities. In addition, a developed campground will help accommodate the foreseeable increase in visitors as the Bangs Canyon and Tabaguache Trail improvements come on line.

We would like to see greater restrictions on residential wood gathering and Christmas tree harvesting on the sparse, desert pinion forests. The removal of these very, very old pinion pines should be more closely monitored, and both of these activities encourage cross country travel by large vehicles during times when the soils are wet. We hope that these activities will be better managed in the future.



Gateway

We recommend that the mesa tops and access to the mesa tops be allocated to shared use primitive motorized recreation. The existing network of routes needs to be designated as shared use for all visitors. In addition we would like to have a system of single-track trails to enhance the quality of the trail experience, which will in turn coincide with the destination quality of the Gateway region. The designation of a Back Country Byway in the Gateway region (see Back Country Byways) will increase the ability to compete for federal, state and private funds to implement and maintain a quality system of recreation routes on Delores, Calamity, Outlaw, Blue and Tenderfoot Mesas.

We also want the travel plan to include trail and road connections to the neighboring Uncompaghre National Forest.

Granite Creek

The routes along the Utah/Colorado Border near Granite Creek cross back and forth between states and BLM jurisdictions. It is important for commercial and recreation access that routes on both sides of the border are open to vehicle access. Please co-ordinate with the Moab Field Office to be sure that these important routes remain open to public access.

Both the TPA and COHVCO are ready to work with the GJFO in all aspects of the RMP. The resources of both organizations can be utilized to assist in a recreation plan that helps all user groups. Volunteer personnel as well as OHV grant development to support the GJFO are areas that both the TPA and COHVCO can assist on.

We look forward to reviewing the next stage of the RMP development.

Sincerely

Don Riggle
Director of Operations