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Executive Summary of BLM's Kremmling Office Proposed Resource Management Plan.

The Kremmling Field Office ("KFO") of the BLM located in Kremmling, CO has released the proposed Resource Management Plan ("RMP") for the office and is looking for public comment by January 17, 2012. The Kremmling Office manages BLM lands located north of I-70 between the eastern boundaries of the Medicine Bow/Rout National Forest and western boundaries of the Arapahoe Roosevelt National Forest. The RMP proposes to:

1. Decrease cross-country travel currently allowed on 307,300 acres to 200 acres;
2. Decrease designated route mileage for full-size vehicles from 1,739 miles to 872 miles;
3. Decrease designated route mileage for ATVs from 73 miles to 14 miles;
4. Decrease designated single-track route mileage for motorcycles from 53 miles to 21 miles;
5. Decreasing mileage for mechanized/ non motorized from 99 miles to 72 miles; and
6. Decreasing mileage for foot/horse traffic from 33 to 6 miles.

Alternative D is the best alternative for OHV recreation but this Alternative fails to address usage trends on the Office and fails to provide a viable plan for realistic management of the lands over the expected life of the RMP. The RMP could be outdated at the time the final decision document is released. COHVCO and TPA are opposed to Alternative C as the Alternative lacks scientific basis and violates both state and federal planning guidelines.

COHVCO, TPA and CSA's concerns are:

1. The RMP provides a large amount of information regarding uses which are very disorganized and hard to review. The lack of basic organization will limit the amount and effectiveness of public comment provided, which will result in oversights and inaccuracies in the RMP which will not be discovered until such a time when the remedy for the issue will be far more difficult to implement. The Organizations believe that combining travel management and resource management plans is simply not a viable management process, and these issues should be addressed separately. There is simply too much information to be analyzed under a combined plan.
2. The economic impact of the proposed closures in the travel management portion of the RMP has been overlooked, such as examination of the economic impact of closing approximately 50% of the motorized routes on the planning area. A lack of access has already been identified as a hunting management issue on the KFO, and closing 50% of routes will clearly impact many uses outside motorized recreation. The RMP asserts that closing 50% of the motorized trails will result in no negative economic impacts to Colorado communities. This simply is not correct.
3. There is no meaningful analysis of travel management issues in the RMP. The travel management portion of the RMP is covered in 51 pages addressing four alternatives for 378,884 acres. This analysis of the proposed range of issues is significantly smaller than most decision documents for travel management plans, which are hundreds of pages discussing the final alternative for areas that are less than 1/10 the size of the KFO planning area. The basic size discrepancy has to cause concern regarding any sufficiency of analysis. For comparison, the White River National Forest travel plan decision provided a 61 page route specific outline of changes. The KFO RMP simply omits even a summary of why 50% of the motorized routes are being closed. The lack of this information will directly impair the ability of the public to comment on specific routes as the public simply is not aware of why the route is being closed.
4. The Travel Management Plan proposed simply does not reflect current usage levels, future usage projections developed in the numerous state planning documents which must be reviewed and incorporated in federal public lands management. The failure to accurately address demands on the KFO going forward will result in a plan that rapidly loses utility for on the ground management.
5. While the initial closures proposed in the RMP are painful for the OHV community, many of the standards and guidelines proposed lay the groundwork for significantly more closures in the future, if area specific travel management plans are developed to address site specific issues. The issue specific travel management standards (ie: big game habitat, lynx and sage grouse habitat) are often not supported by scientific research and often directly conflict with regional management guidelines for the species. The RMP standards almost always seek to exclude motorized access first, even if it is not identified as a concern in regional planning documents.

6. The RMP moves to a fully designated trail system for all users but the benefits of the designated trail system change simply are not addressed. The RMP does not analyze why the habitat protection of a designated trail system is not sufficient to achieve RMP objectives and why the RMP finds further closures are necessary, when most habitat management plans identify a designated OHV trail system as the single biggest step towards protecting habitat.

7. The RMP proposes significant number of standards to manage issues in absolute terms, which fail to provide any flexibility to address multiple usage concerns that might conflict with the management standard. An example of this lack of flexibility is the proposed standard to “optimize big game habitat”. This standard is of significant concern as most of the planning office is mule deer habitat and optimizing this habitat would require removal of any use that could impact the mule deer, such as inadvertent striking of deer by motor vehicles on arterial roads. This lack of analysis for travel management related issues is a violation of NEPA’s requirements for a detailed statement of high quality information of why decisions in the Plan have been made. If the required NEPA analysis had been undertaken, the fallacy of these positions would have been revealed to the persons who developed the RMP.

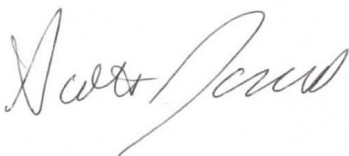
8. The RMP proposes closure of all roads and trails on landlocked parcels to all motorized travel. No management issue is identified as the basis for this closure and this blanket closure will worsen issues on the significantly restricted trail system proposed in the future, as these landowners will now be forced to use other motorized recreational opportunities in the planning office.



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