



November 13, 2012

BLM Grand Junction Field Office  
Attention: Chris Pipkin  
2815 H Road  
Grand Junction, CO 81506

RE: Bangs Canyon Preliminary EA

Dear Mr. Pipkin;

Please accept this correspondence as the comments of the above Organizations in vigorous support of the multiple use trail proposal ("The Proposal") in the Bangs Canyon area of the Grand Junction BLM Office. The Organizations believe a brief description of each Organization will assist in understanding of these comments. COHVCO is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

TPA is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an

advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public land access to trail riding.

Collectively, COHVCO and TPA are referred to as "the Organizations" for purposes of these comments. The Organizations believe the proposal is a significant benefit for multiple use trail users. Maintaining multiple use opportunities on the entire trail network is a significant benefit to all users seeking to enjoy the trail network and access to other resources that this network will provide.

The predominate trail type to be developed under the Bangs Canyon proposal is single track multiple use trails, a trail type of which there is currently a critical shortage in the state of Colorado. While the largest shortages of routes has been found in the single track motorized trail networks, there have been large scale closures of motorized routes on other planning offices, which has heightened the importance of any new trails that are opened for all motorized users. The White River National Forest is currently implementing a travel plan that closes over 30% of their routes, the GMUG National Forest is implementing closures of 35% of their motorized routes, the Colorado River Valley BLM Office proposes closure of over 40% of their routes. These closures are being undertaken as the population of Colorado continues to increase at rates far above the national average and the demand for multiple use access continues to increase. Obviously these closures will not be absorbed completely by the Bangs Canyon area, but the Organizations believe these closures will clearly heighten the value of any new trails to all multiple use users of public lands.

## **2. The Proposal will generate a significant positive economic impact**

Given the closures of routes on adjacent public lands, the Organizations believe that any calculations regarding the economic impact of the Proposal at this point are probably low. The Organizations vigorously believe that the proposed trail network will be a significant economic benefit to the Colorado economy and the communities adjacent to the Bangs Canyon area. COHVCO's 2009 OHV Economic Impact Study concluded that registered OHV recreation provides over \$1 billion dollars a year to the Colorado economy and the communities in and around Bangs

Canyon experience an annual economic benefit of over \$40 million dollars and directly create over 500 jobs annually in these counties. A copy of the COHVCO economic impact study is enclosed with these comments for your reference.

Other sources have identified multiple use trails as a significant economic contributor to rural economies. Forest Service research indicates that a multiple usage trail network is an effective tool for the development of local economies. This research specifically concluded:

"Recreation and tourism economies are the mainstay for rural counties with high percentages of public land. Actions by public agencies to reduce or limit access to for recreation have a direct impact on local pocket books. Limiting access by closing roads, campgrounds, RV parking, and trails for all or one special interests group will impact surrounding communities. Visitors to public lands utilize nearby communities for food, lodging and support facilities."<sup>1</sup>

The Forest service targeting of trail networks as an effective tool for local economic development is based on the long track record of success that surrounds these types of projects. The Hatfield McCoy trail network in West Virginia added over 10 million dollars of spending a year to one of the poorest counties in the US.<sup>2</sup> The Paiute Trail System in southern Utah, which has become a destination for Colorado riders seeking single track trail experiences contributes, contributes similar amounts to the communities the trail network travels through.

The Organizations believe the Proposal will be a benefit to the local economy. While the scale of this benefit is unclear, the Organizations believe that the clear benefit of the Proposal weighs in favor of moving forward with the Proposal.

---

<sup>1</sup> Humston et al; USFS Office of Rural Development; *Jobs, Economic Development and Sustainable Communities Strategizing Policy Needs and Program Delivery for Rural California*; February 2010 at pgs 51-52

<sup>2</sup> Marshall University Center for Business and Economic Research; *Final Report; The Economic Impact of the Hatfield~McCoy Trail System in West Virginia*; October 31, 2006 at pg 3.

**3. The minimal impacts to various resources outlined in the preliminary EA are consistent with research which indicates OHV users are a highly law abiding user group on public lands.**

There are numerous sections of the preliminary EA regarding various resource concerns, which must be more completely addressed in the development of the Bangs Canyon trail network. The Organizations believe protection of these resources is a critical component of any multiple use area. The Organizations believe that the proposed trail network will effectively minimize resource impacts both through trail layout and notice of restrictions to the users of the trail networks to the public. The Proposal and multiple use trail network are entirely consistent with Bangs Canyon SRMA designation and requirements, which have been made to locate trail networks in the proper locations in the Grand Junction BLM office.

The Organizations now can provide concrete information regarding the high compliance with posted restrictions that is exhibited by the OHV community as preliminary findings have been released relative to the Colorado OHV law enforcement pilot project. The law enforcement pilot program developed by Colorado Parks and Wildlife to analyze alleged law enforcement concerns with OHV recreation with the use of professionally trained law enforcement officers. This Pilot was developed in partnership with the Forest Service and Bureau of Land Management and is providing some of the first concrete information regarding law enforcement concerns involving OHV recreation. A copy of the preliminary findings of the report are enclosed with these comments to allow for a more complete understanding of the pilot methodology and veracity of its findings.

The OHV law enforcement pilot program was created to address assertions of a compelling need to stop resource damage from OHV misuse at locations identified as violation "hotspots" by those seeking to limit public access to public lands. While the Bangs Canyon area was not identified as a hotspot for targeted enforcement, the Organizations believe these findings remain highly

relevant to this discussion. The law enforcement pilot program deployed additional trained professional law enforcement officers, funded by monies from the OHV registration funds, at these "hotspots" during heavy usage times to supplement existing law enforcement resources in these areas. As part of the pilot, the additional officers we required to keep logs of their contacts for reporting purposes.

The findings of this pilot clearly identify that these "hotspots" for OHV violations were anything but "hotspots". Over last summer, officers involved in the pilot program contacted over 10,000 people. This is an astoundingly large sampling as there are only 160,000 registered OHVs in Colorado. This pilot program found that less than 5% of riders committed any violations. The overwhelming percentage of these violations were people not registering their OHV. **Only 1.5% of contacts involved activities, other than failing to register OHVs, where the officer found the activity serious enough to warrant the issuance of a citation.**

Additional research from the BLM's Alpine Ranger program outside of Durango also indicates that OHV users are highly compliant with posted restrictions. These reports found similar exceptionally low levels of violations from OHV activity, even when an area is targeted for law enforcement activity. A copy of those reports are enclosed with these comments for your review.

The Organizations believe the conclusions of this groundbreaking research are highly relevant here and will provide a high degree of comfort to those with concerns about law enforcement or resource concerns and the Proposal.

#### **4. Wildlife Concerns**

The possible impact of recreation on wildlife is addressed in the Proposal, and is an issue that has been extensively researched by the Forest Service's Rocky Mountain Research Station. While the Research Station has centered on winter motorized recreation, these findings are completely relevant to

addressing management of summer recreation as researchers agree that any negative impacts to wildlife would be more easily recognized during winter periods when stress is greater on the animals. This research has uniformly concluded usage of OHV's has little to no impact on wildlife and Forest Service studies repeatedly and specifically stating:

**“Based on these population-level results, we suggest that the debate regarding effects of human winter recreation on wildlife in Yellowstone is largely a social issue as opposed to a wildlife management issue.”<sup>3</sup>**

The Organizations are very aware that often closures to motorized recreational access are based on a desire to "do something" to address public outcry on a perceived wildlife issue rather than a clear scientific basis tying recreation to a particular management issue or species. The Organizations believe these "do something" decisions often results in limited agency resources being directed to management of issues that simply will never actually address the concern or issue with the species. While we are not aware of significant public opposition to the Proposal, "do something" management for species must be avoided and management decisions must be based on good science to allow the decision to remedy the true issues that may be impacting a species in the area.

## 5. Conclusion

The Organizations are vigorous supporters of the Proposal and vigorously believe the trail network must remain a multiple use trail network to allow for the largest benefit to the largest user group. The Proposal would provide a significant economic benefit to the adjacent communities and would have minimal resource risks as newly released research specifically concludes that the OHV community is a highly law abiding community when they are notified of the restrictions.

---

<sup>3</sup> PJ White & Troy Davis. *Wildlife responses to motorized winter recreation in Yellowstone. USFS 2005 Annual Report* at Pg 1.

If you would like a copy of any of the reports relied on in these comments or have questions please feel free to contact Scott Jones at 508 Ashford Drive, Longmont CO 80504. His phone is (518)281-5810.

Sincerely,



John Bonngiovanni  
Chairman and President  
Colorado OHV Coalition



D.E. Riggle  
Director of Operations  
Trails Preservation Alliance

Scott Jones, Esq.  
COHVCO CO-Chairman