



January 29, 2014

Brush Creek/Hayden RD
Att: Brian Waugh
PO Box 249
Saratoga WY 82331

RE: Western Snowy Range Travel Management

Dear Mr. Waugh;

Please accept this correspondence as the comments of the above Organizations in regarding the proposed travel management process for the western portions of the Snowy Range. The Organizations would like to thank the Brush Creek/Hayden Ranger District for this opportunity to provide input at this early time of the planning process. While the planning area is technically outside the Colorado political boundaries, the planning area provides an important riding opportunity for many of our members, and as such is an important resource for the Organizations. As such the Organizations are requesting to be included in any further planning that occurs in response to the scoping letter.

The Organizations believe a brief description of each Organization will assist in understanding of these comments. COHVCO is a grassroots advocacy organization representing the approximately 200,000 registered OHVs in Colorado 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.

It is the Organizations understanding that many of our local members are contacting the Ranger District in response to the scoping request to identify important trails and opportunities. The Organizations are not attempting to provide a summary of these trails and their importance but rather the Organizations would like to provide updates on several wildlife issues and research on user conflicts for use in the planning process moving forward.

1. Management standards for wildlife.

The Organizations would like to start with a summary of recent research into the effectiveness of travel management in addressing wildlife concerns, as the Rocky Mountain Research Station is now releasing their preliminary analysis of data obtained after implementing travel plans throughout the region. The Research Station's findings are as follows:

"Actions such as limiting grazing or closing OHV trails have historically been some of the primary tools used by land managers in southern Nevada to reduce the effects of anthropogenic stressors on species of conservation concern.... Too often research jumps immediately to mitigation strategies without first determining what specific factors pose the greatest threats and are the most important to mitigate. In addition, the evaluation of potential threats typically focuses upon the usual anthropogenic suspects (e.g. OHVs, livestock grazing, invasive species, and climate change) without first carefully considering which factors are most likely to pose the greatest threats. Finally, fundamental science associated with the life history characteristics and habitat requirements of species typically receives the least attention, even though these topics are where research programs should actually start."¹

Dispersed motorized recreation's possible impact on elk, deer and numerous other herd animals has been extensively studied by the National Park Service in addressing winter usage of Yellowstone Park. The Organizations believe these analyses are completely relevant to any analysis of dispersed motorized recreation in the planning area and provide further support for the work of the Rocky Mountain Research Station. If there were an impact to elk and deer, the

¹ Chambers, Jeanne C.; Brooks, Matthew L.; Pendleton, Burton K.; Raish, Carol B., eds. 2013. **The Southern Nevada Agency Partnership Science and Research Synthesis: Science to support land management in Southern Nevada Executive Summary**. Gen. Tech. Rep. RMRS-GTR-304. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 79 p. at pg 38.

ongoing research in Yellowstone Park would have noted this impact. These analyses have repeatedly found:

“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. Effects of winter disturbances on ungulates from motorized and non-motorized uses more likely accrue at the individual animal level (e.g., temporary displacements and acute increases in heart rate or energy expenditures) than at the population scale. A general tolerance of wildlife to human activities is suggested because of the association between locations of large wintering ungulate herds and winter recreation. Habituation to human activities likely reduces the chance for chronic stress or abandonment of critical wintering habitats that could have significant effects at the population level, especially when these activities are relatively predictable.”²

It is the Organizations long standing position that wildlife management is a valid and proper use of public lands and best available science should be supported, but too often these wildlife management issues are lost in the discussions or used as a surrogate for other issues. While designated trails and seasonal closures are effective at mitigating site specific issues for wildlife, these tools are not effective for management of many other issues such as the impact of the mountain pine beetle on habitat quality. The Organizations believe any travel management planning action is merely one tool the planners tool box, and that use of any tool should not occur without addressing how the tool relates to the primary threats to any species. Often travel management tools are poorly suited to address the primary threats to species.

2. Recent changes in Lynx management must be incorporated in the west snowies plan.

A review of the current Medicine Bow NF RMP reveals that extensive analysis of lynx related issues has occurred on the planning area.³ The large scale overlap of lynx habitat areas to the planning area forces the Organizations to believe lynx management may be an issue moving forward. Lynx management is an issue that there have been significant recent developments in research and agency planning mandates. As a result of these new management changes a copy of these planning documents have been included with these comments for your reference.

² US Park Service; White and Davis; *Wildlife response to motorized recreation in the Yellowstone Park; 2005 annual report*; at pg 15.

³ See, Map I-2 of the RMP

The Organizations would like to summarize many of the changes to recreationally related management standards that are provided in this document:

- Recreational usage of lynx habitat is a second level threat and not likely to have substantial effects on the lynx or its habitat. Previous theory and management analysis had placed a much higher level of concern on recreational usage of lynx habitat;⁴
- Lynx have been known to incorporate smaller ski resorts within their home ranges, but may not utilize the large resorts. Dispersed motorized recreational usage certainly does not create impacts that can be equated to even a small ski area;⁵
- Road and trail density does not impact the quality of an area as lynx habitat;⁶
- There is no information to suggest that trails have a negative impact on lynx;⁷
- Snow compaction from winter recreational activity is not likely to change the competitive advantage of the lynx and other predators;⁸
- Snow compaction in the Southern Rocky Mountain region is frequently a result of natural process and not recreational usage;⁹
- Winter recreational usage of lynx habitat should only be "considered" in planning and should not be precluded given the minimal threat this usage poses to the lynx; and¹⁰
- Failing to manage habitat areas to mitigate impacts of poor forest health issues, such as the spruce and mtn pine beetle, is a major concern in lynx habitat for a long duration.¹¹

Given the significantly lower levels of concern for possible impacts to lynx habitat from recreational usage of lynx habitat, the Organizations believe this should be an issue of minimal concern moving forward in planning in the West Snowy Range area.

⁴ 2013 LCAS at pg 94.

⁵ 2013 LCAS at pg 83.

⁶ 2013 LCAS at pg 95.

⁷ 2013 LCAS at pg 84.

⁸ 2013 LCAS at pg 83.

⁹ 2013 LCAS at pg 26.

¹⁰ 2013 LCAS at pg 94.

¹¹ 2013 LCAS at pg 91.

3. Water quality is very good in the planning area.

The Organizations are very concerned with possible water quality issues that may be involved with any trail. Our members are multiple use recreational users and often are active hunters and fisherman and truly appreciate a quality and healthy forest. As such, the following comments are made to support the effectiveness of mitigation measures on the various routes, such as hardening, culverts and other activities. It appears that the encampment river watershed area is very healthy and is not being significantly impacted by recreational activities in the area.

In addition to the Proposal area not being a Watershed of concern under the existing LRMP, the USGS has prepared a water quality analysis for the encampment river, which is immediately adjacent to the planning area. Much of the USGS data was acquired before designated trail system, if there was a water quality issue as a result of OHV recreation in the area the Organizations must believe it would have been apparent in this report.

4a. User conflicts often cannot be resolved with travel management.

User conflict is another issue that often is significantly involved in travel planning and proper analysis of this issue is critical to insure that an accurate basis for the conflict has been determined and that the proper management tools are being applied to remedy the basis of the conflict. User conflict is often a very localized event and expansion of this local management issue to a landscape level issue fails to address the true nature of the conflict. Research indicates that landscape level socially based user conflicts can only be resolved with education of users and this option must be addressed if user conflicts become a significant issue.

User conflicts often exist outside motorized recreation, such as between skiers and snowboarders, heli-skiers and back country skiers, hunters and non-hunters, hunters and other hunters, hikers and bikers, runners and dog walkers on urban trails, and hikers and farmers. Despite the ongoing nature of these conflicts, motorized recreation on public lands is the only area for which closure has been asserted to be properly be the first method for remedying perceived conflicts. This position is completely arbitrary as user conflict, especially personal user conflicts often exist between users in the same general category and often occur regardless of the method of transport used to get to the area.

The Organizations believe that after a brief summary of research into user conflict, the difference in the using travel management as the primary tool to address user conflict and best available science on the issue will be clear. Researchers have specifically identified that properly determining the basis for or type of user conflict is critical to determining the proper method for managing this conflict. Scientific analysis defines the division of conflicts as follows:

“For interpersonal conflict to occur, the physical presence or behavior of an individual or a group of recreationists must interfere with the goals of another individual or group....Social values conflict, on the other hand, can occur between groups who do not share the same norms (Ruddell&Gramann, 1994) and/or values (Saremba& Gill, 1991), independent of the physical presence or actual contact between the groups.....When the conflict stems from interpersonal conflict, zoning incompatible users into different locations of the resource is an effective strategy. When the source of conflict is differences in values, however, zoning is not likely to be very effective. In the Mt. Evans study (Vaske et al., 1995), for example, physically separating hunters from nonhunters did not resolve the conflict in social values expressed by the nonhunting group. Just knowing that people hunt in the area resulted in the perception of conflict. For these types of situations, efforts designed to educate and inform the different visiting publics about the reasons underlying management actions may be more effective in reducing conflict.”¹²

Other researchers have distinguished types of user conflicts based on a goals interference distinction, described as follows:

“The travel management planning process did not directly assess the prevalence of on-site conflict between non-motorized groups accessing and using the yurts and adjacent motorized users....The common definition of recreation conflict for an individual assumes that people recreate in order to achieve certain goals, and defines conflict as “goal interference attributed to another's behavior” (Jacob & Schreyer, 1980, p. 369). Therefore, conflict as goal interference is not an objective state, but is an individual's appraisal of past and future social contacts that influences either direct or indirect conflict. It is important to note that the absence of recreational goal attainment alone is insufficient to denote the

¹² Carothers, P., Vaske, J. J., & Donnelly, M. P. (2001). *Social values versus interpersonal conflict among hikers and mountain biker*; Journal of Leisure Sciences, 23(1) at pg 58.

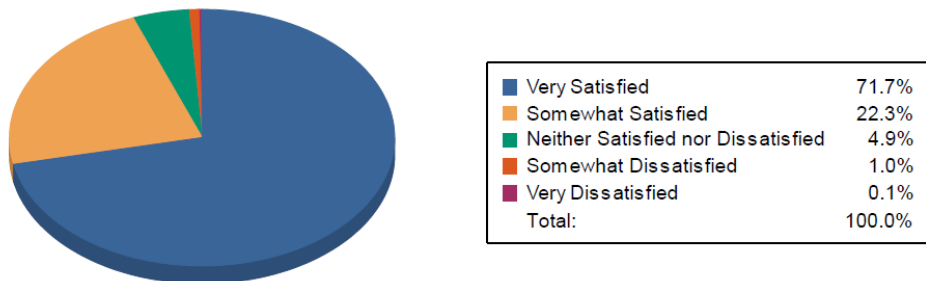
presence of conflict. The perceived source of this goal interference must be identified as other individuals.”¹³

It is significant to note that Mr. Norling’s study, cited above, was specifically created to determine why travel management closures had not resolved user conflicts for winter users of a group of yurts on the Wasache-Cache National forest. As noted in Mr. Norling’s study, the travel management decisions addressing in the areas surrounding the yurts failed to distinguish why the conflict was occurring and this failure prevented the land managers from effectively resolving the conflict. The Organizations believe that travel management planners must learn from this failure and move forward with effective management rather than fall victim to the same mistakes again. As such this issue has been brought forward in scoping to avoid confusion later in planning.

4b. NVUM analysis indicates user conflicts are a minimal concern in the Routt National Forest.

The Organizations also must address the high quality nature of recreational experiences that are currently provided to visitors to the Routt National Forest as found in NVUM analysis. A complete copy of the Round 2 NVUM analysis has been provided with these comments for your reference. The high quality recreational opportunities on the Routt NF have been extensively analyzed in the USFS NVUM process, which yields the following conclusions:

Figure 5. Percent of National Forest Visits by Overall Satisfaction Rating



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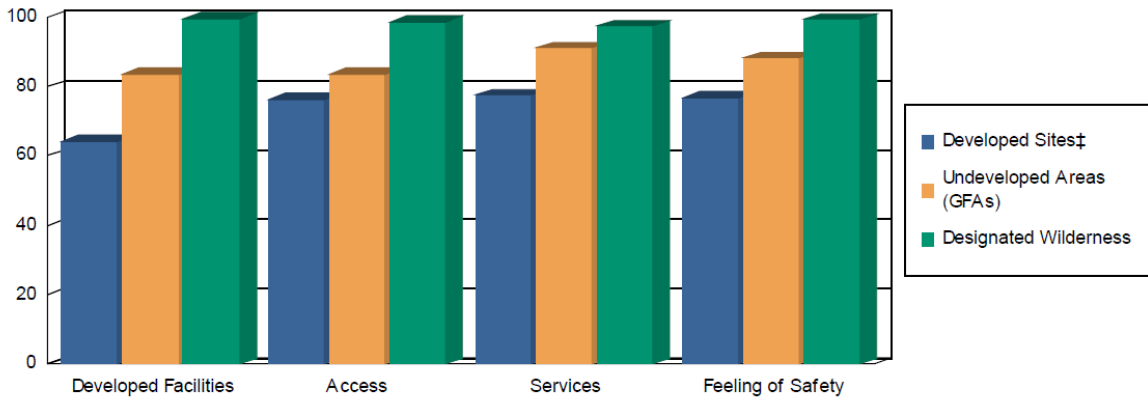
¹³ Norling et al; Conflict attributed to snowmobiles in a sample of backcountry, non-motorized yurt users in the Wasatch –Cache National Forest; Utah State University; 2009 at pg 3.

¹⁴ See, Routt National Forest NVUM research Round 2 at pg 31 (hereinafter referred to as NVUM research).

The Organizations will note that providing a 94% rating of somewhat or very satisfied response from any user groups is impressive. The Organizations believe preserving these high levels of satisfaction is an important factor to be preserved in the proposal and directly rebuts any claims of user dissatisfaction with recreational opportunities. These issues are clearly a very minimal planning concern and should be managed as such.

NVUM analysis further finds that those using developed and GFS sites are often less satisfied with the levels of access to these sites. NVUM analysis states the conclusions on this issue as follows:

Figure 6. Percent Meets Expectations Scores*



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The Organizations believe addressing the perception of access as an issue when using these facilities must be a priority in any planning for the western portion of the Snowy Range area.

The Organizations would like to note that often poor conditions of roads and signage is a major concern for forest users. The Organizations believe addressing these concerns in the proposal area is a significant issue to be addressed in the proposal area moving forward. The NVUM analysis provides the following summary of these concerns:

¹⁵ NVUM research at pg 32.

Figure 7a. Satisfaction with Forest-wide Road Conditions & Signage Adequacy

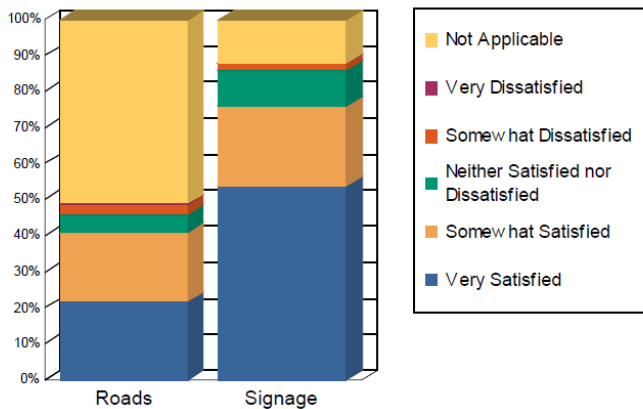
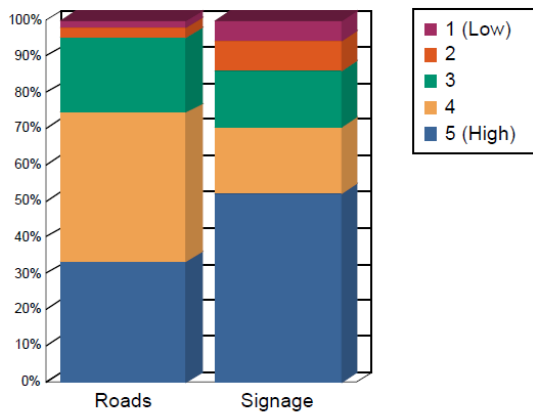


Figure 7b. Importance of Forest-wide Road Conditions & Signage Adequacy



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The Organizations believe that any planning that is undertaken in the Western Snowy Range area must address a preliminary question of what are the concerns of users in the area and how does the planning assist in resolving these concerns. As noted above maintaining the current levels of access and opportunity is a significant concern for users moving forward and closures will not help resolve concerns for limited access of users.

5. Expanded funding for roads and trails is now available

In several locations in the scoping notice, there are concerns raised about the limited funding available for maintenance of roads and trails in the proposal area. The Organizations completely understand this concern and impacts to recreational opportunities and management that can result from limited budgets. These Ranger District level budgetary

¹⁶ NVUM research at pg 35.

concerns in Wyoming can now be partially addressed through the newly created OHV grant program that has been developed by the Wyoming State Trails Committee, which is designed to assist in offsetting exactly these types of funding issues with money from both the Recreational Trails program and OHV registrations in the State.

The Wyoming OHV grant program just completed its second grant cycle and awarded almost \$1 million dollars in grants for projects such as the one proposed. The Organizations would hope these resources would allow more trails in the proposal area to remain open and would encourage any proposals for the area to be developed to address this additional funding. More information on this program is available on the Wyoming State Trails grants website, which is <http://wyotrails.state.wy.us/Grants/RTPGrants.aspx>

6. Conclusion

The Organizations welcome this opportunity to provide input on the Western Snowy Range travel plan. As previously noted many of our members and clubs are preparing route specific comments, and our comments are submitted to be a resource in moving forward with the management of this area. The Organizations believe there are minimal wildlife, water and user conflicts in the area along with new funding programs which provide a realistic opportunity for maintaining current levels of usage and satisfaction to recreational users of the area.

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,



Scott Jones, Esq.
COHVCO Co-Chairman
CSA Vice President

D.E. Riggle
Director of Operations
Trails Preservation Alliance



John F. Lane
COHVCO Co-Chairman & President

