



March 11, 2015

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

Re: Tabeguache Trail-Highway 141 Connector Route
Project #: DOI-BLM-CO-130-2013-0042 EA

Dear Mr. Pipkin;

Please accept this correspondence as the comments of the above noted Organizations **vigorously** supporting the opening of a route connecting the Tabaguache Trail to Highway 141, hereinafter referred to as "the Proposal". Prior to addressing specific comments on the project, a brief summary of the Organizations is necessary to provide context for these comments. COHVCO is a grassroots advocacy organization representing the 150,000 plus registered OHVs in the State of Colorado. COHVCO is 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 of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. For the purposes of these comments, COHVCO and TPA will be referred to as the Organizations.

The Organizations vigorously support the preferred alternative of the EA, as the Organizations believe this connector trail will significantly increase the overall quality of multiple use recreational trails in the planning area. While the connector trail will significantly increase loop

opportunities for trail riders in the planning area, the Organizations do not believe that these new connections will greatly increase visitation to the area. The Organizations also believe that the completion of this project, which has been under analysis for an extended period of time, will be a significant step forward in mending relations between the multiple use community and the GJFO which have been strained after the release of the DRMP. The Proposal provides an exceptionally complete review of the planning that has occurred over the decades of management documents that have addressed this project.

The Organizations further support the closure of the existing route in the planning area to all usage upon completion of the new connector trail. The Organizations believe this closure will avoid management of redundant trails that infringe on private property and are difficult and costly to maintain and may be negatively impacting natural resources in the planning area. The Organizations further believe that closure of the route will simplify management of all travel in the planning area by providing a single high quality route for all recreational usage and increased access for land managers performing maintenance in the area.

The Organizations submit that wildlife populations will not be negatively impacted by the proposal, as the Proposal addresses less than 1 mile of trail. A review of the CPW wildlife management plans in the proposal area reveals that deer populations are below targets but that threats to the species are completely unrelated to recreational activity. These threats consistently include private land development and interspecies competition. The herd management plans also note that many in the hunting community are seeking better access to the planning area for hunting, which is entirely consistent with the scope and intent of the Proposal.

While the population of big horn sheep on the GJFO has not warranted the development of a herd specific management plan by CPW, CPW has developed a statewide management plan for the big horn sheep. This plan clearly notes that motorized routes are a low priority management issue, as the primary threat to big horn sheep is a virus easily transferred from domestic herd animals. The CPW statewide big horn sheep plan explicitly states:

"Bighorn sheep managers generally agree that bacterial pneumonia (also called "pasteurellosis") is the main reason for Rocky Mountain bighorn sheep population declines across much of the west in recent decades.... There are a number of strains of *Pasteurellaceae* commonly carried by domestic sheep and goats that are highly pathogenic to bighorns, and introduction of a pathogenic strain or another novel pathogen into populations can cause all-age die-offs and lead to low lamb recruitment.

Based on a substantial volume of literature, one of the most important aspects of wild sheep management is to keep these species separated from domestic sheep and goats."¹

The statewide sheep management plan does discuss other factors that maybe impacting sheep. These factors are summarized as:

"Other problems such as unregulated harvest, overgrazing, competition with other livestock, plant community succession and forestation of native ranges, and increasing human development of winter ranges have been identified as contributing to bighorn sheep declines either historically or presently."²

Given the clarity of this document , any assertion that the Proposal would negatively impact big horn sheep would be difficult at best and falls well short of creating a sufficient basis to restrict access or not move forward with the Proposal. Given that motorized recreation is unrelated to the primary threats to the big horn sheep, the Organizations believe that the proposed monitoring of populations for impacts related to motorized recreation provides more than sufficient protection for these species.

In conclusion, the Organizations vigorously support the preferred alternative and would hope that trail construction could be completed this summer on the project. While the connection is a short distance of trail, the construction of the connector would be highly valued by the recreational community as the connection would significantly improve the quality of multiple use recreation in the proposal area.

If you have questions please feel free to contact: Scott Jones, Esq., 508 Ashford Drive, Longmont CO 80504. His phone is (518)281-5810 and email is scott.jones46@yahoo.com.

Sincerely,



Scott Jones, Esq.
COHVCO Authorized Representative

D.E. Riggle
Director of Operations
Trails Preservation Alliance

¹ George et al; Colorado Division of Wildlife; *Colorado Bighorn Sheep Management Plan 2009-2019*; February 2009 at pg 2

² *Id* at pg 1.