



June 7, 2016

Rio Grande National Forest
Attn: Dan Dallas, Forest Supervisor
1803 W. Highway 160
Monte Vista Co 81144

**RE: Rio Grande National Forest Plan Revision – Forest Inventory
Comments**

Dear Supervisor Dallas:

As the Rio Grande National Forest commences the Forest Plan exercise, we understand the need for the Forest to inventory, evaluate, analyze, and potentially recommend additional wilderness as part of this process. Our organizations feel strongly that the RGNF has an excess of wilderness already, and any further recommendation and designation would be to detrimental both within the Forest boundaries and beyond them.

Many of the critical reasons not to recommend additional wilderness in general and for specific areas in particular are most appropriate to the evaluation and analysis phases, so with that in mind, please accept these comments in regard to the inventory step in the process.

- 1) We recognize the importance of the inventory process, however, the approach revealed is excessively broad and inclusive. Within the areas recommended for inventory are ditches and dams that are part of the active utility system of the San Luis Valley, roads and trails that are that are visible from space, and structures that are less part of the historic and cultural landscape of the area than the unintended consequence of generations of human interaction and resultant diminished “wilderness character”. Taken individually, each of these characteristics is “significantly noticeable” in our view, but taken together, they should disqualify many areas from even being considered. We believe that the Forest should apply a filter to the inventory process that includes attributes such as ditches, dams and diversions, structures, motorized trails, etc. and

remove from consideration such polygons that fall below 5000 acres when including these man-made features and attributes.

- 2) The need for change document lays out nine requirements for the Forest Plan revision process. Beyond the requirement to consider new wilderness, any recommendation of additional wilderness would be counterproductive when to at least six of these evaluation criteria. While this may be a subject better handled in the evaluation and analysis phases, it would seem critical to start the process with a recognition that precisely because of the uncertainties of climate change, biodiversity, and human needs, Wilderness designation is the wrong approach for good stewardship. Such designation would tie the hands of agencies to manage, at the moment when such management and agency flexibility may be needed most.
- 3) Finally, and critically, the RGNF is already managed as 52% wilderness, roadless or other special, restrictive designation. At the same time, only 4.6% of forest visitors go to wilderness, and these areas do almost nothing to support industry and commerce outside the forest. Logically, if there are two equally “wild” areas in the forest, and one is designated as wilderness, the other must not be or else the forest will have effectively discriminated against the vast majority of visitors, as well as adversely impacting the remaining undesignated area by focusing 95% of traffic on a smaller and smaller area.

In summary, while we recognize that the RGNF is required to work through this exercise during the Forest Plan revision, we feel that the logic which disqualified additional Wilderness recommendations in the 1996 Forest Plan remains valid. These areas have not become more “wild” in the following years. We appreciate your efforts to guide this complicated and drawn-out process. Our organizations intend to be involved at each step of the Forest Plan process, please keep us informed of all findings and opportunities for comment and input.

The Trails Preservation Alliance would welcome a discussion of these comments at your convenience. Please feel free to contact Don Riggle or Mr. Ned Suesse at 719-338-4077 or ned@nedsuesse.com.

Sincerely,



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