



October 14, 2016

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

**Rio Grand National Forest Plan: Proposed Action
Comments**

Dear Supervisor Dallas:

Please accept these comments on the Rio Grande National Forest, Forest Plan Revision Project on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to insure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail multiple-use recreational opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users in Colorado seeking to represent, assist, educate, and empower all motorized recreationists in the protection and promotion of multiple-use and 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 and COHVCO are referred to collectively in this correspondence as "The Organizations." The Organizations generally support the Proposed Action but offer the following comments and concerns regarding this project. We have generally organized our comments relative to the primary areas of proposed change.

These comments do not supplant any of the rights and privileges of our members' and associated clubs to submit comments of their own to retain their individual standing.

1. Fire Management (Re: Forest-Wide Goal 2):

- a. The Organizations recognize the benefits of fire to the forest and the associated forest resources. However, we have concerns regarding the typical exclusion of public access post fire. We understand the desire for public safety, but too often we feel post fire landscapes have been closed to the public for excessive periods of time. We feel that an appropriate goal of returning public access to post fire zones is one year. That all roads and trails be re-opened to unfettered public access within one year of fire suppression.
- b. Similarly for large-scale beetle kill areas, we recommend that instead of broad closing of these areas and the associated closing of trails and routes within those areas, that public access to these areas remain open. That hazard trees and snags in close proximity to multiple-use trails and routes be felled, thereby reducing and mitigating the hazard. For those routes that are open to OHV recreation, this felling activity could be considered for Colorado State OHV grant funding.
- c. An adequate network of forest roads and trails is necessary to provide access in times of emergency. The USFS is a world-renowned expert on wildland firefighting and knows firsthand the importance of good access, redundant routes and routes in key places and the impact of those routes on the safety of the firefighters, the public and successful wildland firefighting. Demands for reduced road inventory, for reduced route density and increased decommissioning of roads is not collectively and universally in the best interest of neither the forest nor the public. The premise that decommissioning roads will reduce human caused fires is unfounded and unsubstantiated and should not be utilized as a criteria for any decisions regarding the elimination or closure of any multiple-use or motorized route.
- d. With few exceptions, the roads and trails within the Rio Grande National Forest have been in existence and providing public benefits for decades. History has shown that each of these routes provides a level of tangible recreational, economic and/or forest access value. The recent West Fork Complex Fire in 2013 demonstrated firsthand the advantages of having a robust and interconnected network of routes. Continuing to have an adequate network of forest roads and trails will be truly beneficial and necessary in providing sufficient access for future timber management, continuing forest visits and recreation, emergency egress and wildland firefighting efforts.

2. Sustainable Recreation (Re: Forest-Wide Goal 3):

- a. The Organizations feel the proposed forest plan lacks emphasis on recreation. We offer that forest recreation needs to be a more prominent focus area when developing

alternatives. Similarly we ask that multiple-use and motorized recreation be specifically addressed in the General Forest Geographic Area.

- b. As the State of Colorado's population has grown, so have the sales of Off-Highway Vehicles (OHV's), bicycles, hiking equipment, camping units and other forms of outdoor recreation increasing the demand for recreation sites within the Rio Grande National Forest. It is estimated that approximately 8.5% of the households in Colorado participate in OHV recreation and that between 2000 and 2014, resident OHV registrations have increased by 119% with Non-resident permits increasing by over 1,607%!¹ The need and demand for OHV recreational opportunities are growing and will continue to grow, we ask that Forest roads and trails be considered as critical infrastructure for recreation.
- c. We fully recognize that this action proposes to revise and update the Forest Plan for the Rio Grande National Forest and is not a Travel Management decision. However, the implications for Travel Management into the future are significant and cannot be disregarded or ignored. Just as the Forest Plan revision made in 1996 resulted in significant reductions in opportunities for multiple-use and motorized recreation, we feel strongly that this new, revised Forest Plan (along with the required *Desired Conditions, Objectives, Standards and Guidelines*) will have implications aimed at, and will "set the stage" for multiple-use and motorized recreation for many years to come. Each of the Proposed Management Areas on page 14 of the Proposed Action, must be carefully and deliberately analyzed for the impacts to multiple-use and motorized recreation and the affects upon both the existing and future inventory of recreational opportunities available for multiple-use and motorized recreation. Consequently, "Multiple-use and Motorized Recreation/Travel" should be included into Table 1.4 as an Allowable Activity and the matrix annotated accordingly.
- d. As stated above, Forest Plan revisions regularly have direct, intended and often times unintended consequences on the number of and quality of opportunities available for multiple-use, motorized and OHV recreation. The Organizations believe that trails and routes within the Rio Grande National Forest have been closed improperly in the past and without proper consideration for NEPA. Specifically the following lists of routes (listed by Ranger District) were improperly closed during the last forest plan revision and should be reconsidered and re-evaluated for multiple-use access (i.e., re-opened accordingly). These routes all have a prolonged history of providing multiple-use recreation and have provided access for decades. Each of these routes traverses very

¹ DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016. *This study is nearing completion and will be finalized in the very near future.*

remote regions of the Forest, experience very minimal and intermittent use and therefore cause diminutive impacts. Many of these routes enhance connectivity and looping opportunities for all categories and groups of forest users. We would offer that several local motorcycle trail rider groups and associations have a desire and willingness to adopt these trails and assist the USFS in the maintenance and management of these routes:

i. Saguache Ranger District:

1. 766.1
2. 768
3. 771
4. 793

ii. Divide Ranger District:

1. 908
2. 787
3. 779
4. 804
5. 887
6. 881

- e. The Organizations would encourage and support the Forest's decision to convert most any existing National Forest Service Road (NFSR) to a Full Size Trail or another trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication². Conversion of roads to multiple-use, motorized trails could make those routes eligible for Colorado Parks and Wildlife OHV grant funds (*which can specifically be used for the construction, reconstruction or maintenance of OHV routes or multiple-use trails that allow for motorized use and other activities*). These conversions will thereby help reduce the direct financial burden and

² A copy of this publication has been provided to the Rio Grande National Forest by the TPA/COHVCO. Additional copies are available upon request.

back log to the USFS and can supplement agency funding with user provided funds that were previously unavailable for these routes. Conversion from roads to trails will also reduce the required maintenance level and reduce the necessary amount and back log of funding. Likewise by providing an adequate and varied inventory of routes and trails that fulfills the user's spectrum of needs (today and the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance requiring less expenditures on maintenance, signage, enforcement, etc. We recognize that existing routes all require maintenance; OHV funds have been and will continue to play an important role in meeting USFS operations and maintenance (O&M) costs (*when supporting routes open to OHV recreation*). These maintenance activities funded by OHV users, in turn benefit all categories of forest/trail users. **Closing routes to OHV use does not eliminate the need for maintenance, but takes away one of the available funding sources and tools that can be used to provide O&M resources and also eliminates opportunities for user groups, clubs and associations to partner with the Forest to help provide resources, volunteer labor, etc.** Finally, the lack of fiscal capacity by the USFS should not be criteria for, or lead to closures and reductions in public recreational opportunities, closure of routes or elimination of public access to the National Forest.

- f. In the past there have been unfounded concerns for American elk and mule deer as a reason to close and limit multiple-use and motorized recreation on public lands. The premise that "large animals, especially deer and elk, are sensitive to traffic and activity along roads" is not supported by published scientific research. Extensive studies completed as recently as 2005 by the National Park Service (NPS) in Yellowstone Park stated that "Effects of winter disturbances on ungulates from motorized and non-motorized uses more likely accrue at the individual animal level than at the population scale". Even the biologist performing the research stated that the debate regarding effects on human recreation on wildlife is largely a "social issue" as opposed to a wildlife management issue. This NPS research would certainly seem relevant to wildlife in the Rio Grande National Forest and does not support a premise for closures and reductions in multiple-use recreational opportunities.³ Additional research published by Mark Rumble, Lahkdar Benkobi and Scott Gamo in 2005 has also found that hunting invokes a more significant response in elk than other factors in the same habitat area (e.g. roads or trails).⁴ Likewise research by Connor, White and Freddy in 2001 has even

³ Wildlife Response to Motorized Winter Recreation in Yellowstone, 2005 Annual Report, White, Davis & Borkowski

⁴ Rumble, Mark A; Benkobi, Lahkdar; Gamo, Scott R; 2005. Elk Responses to Humans in a Densely Roaded Area; Intermountain Journal of Sciences

demonstrated that elk population increases on private land in response to hunting activities.⁵ This research again brings into question why multiple-use trail recreation (specifically motorized recreation) might be cited and used as the justification for any closures or modification to public access.

- g. Colorado Roadless Rule. The Organizations are also concerned that the Roadless Rule is often used as a lever for the expansion of Wilderness areas. This is a misapplication of the Roadless Rule, as Colorado has developed its own rule that specifically identifies motorized trails as a characteristic of a Colorado Roadless area; 1) While Roadless areas have limitations on road construction and heavy maintenance, trails are entirely outside the scope of the Colorado Roadless Rule, 2) as trail networks may be constructed and expanded in a Colorado Roadless Area. Page 11 of the Proposed Action lists “Unroaded Areas” as a Desired Condition for Social Resources. We are unclear as to what this condition is or what it might imply and how it fits with the specified Geographic Areas (i.e. General Forest, Roadless, Wilderness, and Special Designations).
- h. Wilderness Areas. We certainly understand that only Congress can designate Wilderness areas per the Wilderness Act of 1964. However, we also understand that the Forest staff has the ability to recommend areas for Wilderness designation. The Organizations do not support any additional Wilderness designated areas within the Rio Grande National Forest. Any additional Wilderness areas would concentrate use on shrinking multiple-use lands and reduce the ability to remove fuels, fight fires or actively manage the lands to promote forest health. Furthermore additional Wilderness will concentrate use, shrink the future reservoir of lands for multiple-use, increase environmental impacts and reduce user satisfaction. The continued loss of multiple-use lands will reduce the capacity of the land for future generations to use and recreate on, violating the intent of the Planning Rule for sustainability. This concentrated use will decrease user satisfaction and harm tourism, which so many of our rural communities depend upon.
- i. For proposed Management Area 5.41 - Deer and Elk Winter Ranges we offer the following comments for considering the use of seasonal closures:
 - i. Minimization of the closure period to maximize availability of the routes and areas for recreational uses.

⁵ Connor, White & Freddy; Elk Movement in response to early-season hunting in Northwest Colorado; The Journal of Wildlife Management; Volume 65, Number 4; October 2001

- ii. Consistent and uniform closure dates to minimize confusion within the individual Ranger Districts and throughout the Forest. Multiple dates will likely be more difficult to communicate to Forest visitors and more challenging to enforce.
 - iii. Natural route closure generally occurs during the winter season due to snow. Coincidence of the required closure periods with the winter season will help minimize impacts to multiple-use of the specified routes. Wherever possible, if the seasonal conditions on the ground are likely to represent an effective barrier to travel, the Forest should avoid implementing seasonal closures that create confusion and create an unnecessary enforcement and financial burden.
 - iv. Seasonal closures that affect only motorized users are inconsistent with the best available science for protecting habitat⁶ and seasonal closures should be made universal to all users.
- j. The Organizations recognize that technology is changing with regard to propulsion of vehicles, namely the use of electrically powered devices. In general we support the use of electrically assisted bicycles wherever bicycles are currently authorized. And, that electrically powered motorcycles be grouped with other motorized uses and allowed for travel on routes designated for motorized use.
- k. The Organizations support motorized cross-country travel, limited to snow machines in the winter within the following Proposed Management Areas:
- i. 3.3 – Backcountry
 - ii. 3.5 – Colorado Roadless Area
 - iii. 3.6 – Upper Tier Colorado Roadless Area
 - iv. 4.3 – Dispersed and Developed Recreation
 - v. 5.11 – General Forest and Intermingled Rangelands
 - vi. 5.41 – Deer and Elk Winter Range area (with reasonable management)
- l. Table 1.4 should be revised such that the Allowable Activity of **“Trail construction/reconstruction”** is allowed in Management Area 4.3 - Dispersed and Developed Recreation.

⁶ Sime, Carolyn A; 1999. Domestic Dogs in Wildlife Habitats, Effects of Recreation on Rocky Mountain Wildlife,

- m. OHV recreation should not be cited as a threat for any Species of Conservation. If the analysis chooses to cite OHV trail tread as having negative impacts on species, then the analysis must also disclose that non-motorized trail tread have a identical negative impacts on species. The impacts from non-motorized trail tread will greatly exceed that of the motorized trails, since there are far more miles and therefore more acres of non-motorized trail tread. The analysis should not include OHV Recreation as a threat to species of conservation, since trail tread should be excluded from being considered habitat, and plants do not grow on the trail tread that OHV use is confined to.

3. Social and Economic support of local communities and connecting citizens to the land (Re: Forest-Wide Goal 3):

- a. The Organizations believe that continued multiple-use access and motorized recreation within the National Forest is vitally important to the preservation and conservation of our public lands and the well being of our citizens. The Organizations acknowledge that as America becomes more urbanized and populations rise, our younger citizens are becoming less connected to and are less likely to identify with the outdoors in their daily lives. Our organizations have worked diligently and continuously to help Coloradans and visitors to our State to be able to access and enjoy our public lands in a safe and responsible manner. We recognize that there is a bona fide correlation between an individual's personal health and their participation in outdoor activities. We continually strive to get youth and families excited about visiting, seeing and experiencing all that our public lands have to offer. We have a history of partnering with the USFS to protect our forest resources while reducing and eliminating barriers that are continuing to make it difficult for Americans to get outside and travel on a multiple-use trail or share a road as part of their outdoor recreational experience. A good example of this is the TPA's annual Trail Awareness Symposium (AKA Colorado 600). An event that each year brings nearly a hundred motorcyclists and enthusiasts to Colorado, the Town of South Fork and the Rio Grande National Forest. The Organizations feel that this project must work diligently to ensure that a balanced spectrum of opportunities are provided in the Rio Grande National Forest to properly serve the diverse cross section of our population and meet their recreational needs.
- b. It is well recognized that the average age of our country's population is increasing and the number of persons aged 50 and older is steadily increasing. As the average age grows, so is the number of people still choosing to recreate outdoors but more and more will be less able to use non-motorized methods of travel or participate in high-energy, high-skill sports. As this demographic group grows, so will their needs for access to the Forest by motorized or other assisted methods. If we collectively fail to recognize and plan for this changing demographic, we will be deliberately excluding a significant

and growing segment of the population from the opportunities to experience and enjoy the Rio Grande National Forest. Many of us hope to retain our individual mobility into the “Golden Years”, but many will not, and they will need to rely upon some sort of motorized or mechanized assistance to access the places we all enjoy and cherish.

- c. The economic impacts of multiple-use and motorized recreation within the counties and communities encompassed by or adjacent to the Rio Grande National Forest cannot be overlooked. Many of the visitors that choose to visit the Forest combine their recreational activities and often include using forest routes to access camping sites, setting up a camp and then employing motorized means to travel and explore the surrounding environment. Significant economic benefits are realized by all of Southern Colorado as the public travels to and from their valued destinations within the Rio Grande National Forest. As an example, motorized recreational enthusiasts were responsible for approximately \$1.6 billion in direct expenditures relating to motorized recreation in Colorado during the 2014-2015 season⁷. As popular as motorized recreation is within the Rio Grande National Forest, the economic benefits to local economies and the nearby communities must not be undervalued. A copy of this economic report is available upon request and should be used in the revision of this Forest Plan.
- d. Page 11 of the Proposed Action lists “Special Interest Areas” and “Heritage Resources” as Desired Conditions for Social Resources. Both of these Desired Conditions need to include language to provide for access if their unique benefits are to be realized. In order to promote “connecting citizens to the land”, access to these areas, especially multiple-use access, must be provided, remain a priority and be stated as part of the Desired Conditions. A similar comment is also made regarding the Desired Condition of “Scenery”.
- e. “Desired Recreational Experiences” is subjective and will vary from individual to individual. A call to decommission roads to return areas into more natural states and enhance recreational experiences is mostly subjective. Very few will be able to enjoy the forest and all of the resources the forest has to offer if adequate motorized access is not provided. Multiple-use and motorized recreation is indeed a bona fide form of recreation and not one to be minimized or eliminated on public lands. Just as it is important to maintain the quality of visitor experiences for non-motorized use, it is equally important to maintain the quality of visitor experiences for motorized use.

⁷ DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016. *This study is nearing completion and will be finalized in the very near future.*

- f. The Organizations realize that this Forest Plan revision does not specifically address Travel Management. However, we feel it is important to spotlight the following principles regarding multiple-use recreation planning and are important considerations when evaluating any modifications to recreational uses on the Forest⁸:
- i. Generally forest visitors participating in multiple-use activities will use routes that exist and adequately satisfy their needs and desires.
 - ii. Non-system/user created routes should be reviewed on a case-by-case basis to determine if any non-system routes will fulfill a valid need and can be altered to meet recreation and resource considerations.
 - iii. Route networks and multiple-use trail systems should meet local needs, provide the desired recreational opportunities and offer a variety of quality experiences. We are not asking that this be done at the expense of other important concerns, but a system of routes that does not meet user needs will not be used properly and will not be supported by the users. Occurrences of off-route use, other management issues and enforcement problems will likely increase if the system routes do not provide an appropriate and enjoyable opportunity.
 - iv. Recreational enthusiasts look for variety in their various pursuits. For multiple-use to include motorized/OHV users, this means looped routes are a priority. An in-and-out route may be satisfactory if the destination is so desirable that it overshadows the fact that forest visitors must use the same route in both directions (e.g., access to dispersed camping sites, overlooks, historic sites, geologic sites, etc.). However, even in these cases, loop systems will always provide better experiences.
 - v. Adequate legal parking and dispersed camping areas are necessary to fulfill the needs and desires of the recreation community
- g. Adaptive Management Domain. In general the Organizations support the use of Adaptive Management methods and techniques. However, we have concerns with the process outlined on page 36. Specifically we have concerns regarding how an adequate and representative cross section of the public will be notified and an effective dialog conducted. We are especially concerned about connecting with the forest users that do not reside in the neighboring communities or counties and that travel from locations distant from the Forest to recreate on the Rio Grande National Forest.
- h. The Organizations support maintaining status quo public access to **Mt. Blanca** and the **Natural Arch** areas.

⁸ Management Guidelines for OHV Recreation, National Off-Highway Vehicle Conservation Council, 2006

4. Mitigating the affects of Climate Change (Re: Forest-Wide Goal 2):

- a. There has been little actual research quantifying how outdoor, forest based recreation will be affected by climate change and how to mitigate for climate alterations in a meaningful and productive manner. There is little scientific research, and far more opinion, on how climate change should be regarded, planned for and implemented. Some benefits may actually be realized through climate change such as an increased number of recreation days per year, longer growing seasons, etc. The analysis of the effects of climate change, specifically upon forest recreation, and how to properly address effects (if indeed there are any) remains a fledgling science at best, and subject to individual opinions. As a change in climate occurs (as it has in the past) there is no doubt that the forest ecosystems will adapt and our socioeconomic habits and factors will also change and adapt. To restrict or limit accessibility and the recreational use of the Rio Grande National Forest would be impulsive, unjustified, reckless and impossible to enforce. The shear growth of our population, uncertainty about incomes and spending, changes in future building materials, and the demand for forest products (domestic and imported) just to name a few will likely have far more impacts on the forest compared to the effects of climate change. Properly constructed roads and trails within the forest coupled with sensible timber management will all help to mitigate any effects of climate change both on the existing and future road and trail infrastructure. Minor adjustments to USFS design criteria to include values such as Design Storm Frequency, Rainfall Intensity, Runoff Coefficients coupled with appropriate sizing of the supporting drainage infrastructure (e.g. ditch sizing, culvert sizing, rip rap sizing, re-vegetation practices, trail/road alignment, etc.) can all be used to mitigate more extreme weather events and any increased flows that might be attributed to climate change. We feel it is interesting to note that one of the cited effects of climate change is an increase in wildfires; this concern would seem to actually support an argument for an even more extensive and robust transportation network to facilitate emergency response to wildfire. We also feel it is important to point out that trends have already begun to replace internal combustion engines with electric motors in OHV's, a trend we expect to continue and increase and thereby reduce OHV's collective emissions footprint.

5. Proposed Forest-wide Desired Conditions for OHV Recreation:

- a. Motorized vehicle use will occur on USFS system roads, trails and areas, except as authorized by permit or for administrative uses. Opportunities exist in appropriate places for responsible motorized recreation with varying experiences for a variety of

vehicle classes and types. Forest visitors enjoy semi-primitive motorized recreation and explore the backcountry in OHVs along designated routes. Sound from motorized vehicles is infrequent, away from areas of higher road and motorized route density.

- b. A motorized system of routes provides: a variety of route widths and levels of challenge for a diversity of users, scenery and wildlife viewing, a variety of terrain and conditions, and dispersed camping. Multi-use trails are more common than those available for only one class of vehicle or user and may interconnect with roads or other routes to make loops. Motorized routes are easily identified on the ground and the Motor Vehicle Use Map (MVUM). Single-track trails emphasize solitude from other types of motorized vehicles, to the extent practical, and challenge.
- c. Adequate signing is provided to advise users of motorized restrictions. Information kiosks are located at main entryways onto the Forest with pertinent OHV recreation information. Information is provided for OHV recreationists and trail users, including maps and signs that provide road and trail information and explain USNF regulations for such activities as OHV travel, camping, and trail opportunities. Orientation information and interpretation is provided at sites that receive high levels of visitation.
- d. Resource damage from unauthorized motorized routes is minimal and existing user-created roads and trails are rehabilitated to prevent future access by the public and to mitigate long-term soil and water impacts. Roads and trails are located with minimal impact to cultural sites, soil, water, and wildlife resources. Poorly located routes are redesigned or relocated.

6. Proposed Objectives, Guidelines and Standards for OHV Recreation:

- a. Objectives
 - i. No net decrease in the total existing mileage of roads and multiple-use/motorized system trails during the period/lifetime of the revised plan with two modifications; 1) provide a 15% increase in total trail mileage available for motorized/multiple-use single track, with an emphasis on providing additional opportunities for “novice” single track riders and 2) provide designated recreational opportunities (e.g. loops and routes) for UTV’s (AKA side by sides).
 - ii. Rehabilitate 10 to 20 miles of user-created routes (including both motorized and non-motorized routes) per year until evidence of non-system trails is minimized Forest-wide.
 - iii. Convert existing National Forest Service Roads (NFSR) to Full Size Trails or another trail designation (e.g. Trail open to Motorcycles, or open to Vehicles 50”

or less in width) whenever the primary purpose of the road is recreation and the road does not provide a direct access from one area to another. *(Note: Conversion to Full Size Trails will help solve the problem of insufficient funds for road maintenance and make those routes eligible for Colorado Parks and Wildlife OHV grant funds. We also encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication⁹).* Complete conversions from NFSRs to trails suitable for motorized recreation within 10 years of plan approval.

- iv. Within the first 5 years of plan approval, consider inclusion and adoption of quality “non-system” routes to help meet the Forest’s transportation and recreational needs and demands.

b. Guidelines

- i. Off-route use of any kind (i.e., both non-motorized and motorized) should be limited to prevent loss of vegetative cover and prevent soil erosion.
- ii. Seasonal access restrictions and closures are minimized in order to maximize the availability of the forest routes and areas for OHV recreational uses. Consistent and uniform closure dates are utilized to minimize confusion within the individual Ranger Districts and throughout the Forest.

c. Standards

- i. Prohibit motor vehicle use beyond the designated system of roads, trails, and areas, as defined on MVUMs, except for those uses authorized by law, permits, and orders in connection with resource management and public safety.
- ii. Discourage off-trail use by all other categories of trail users.

7. Proposed Management Approaches:

- a. Establish long-term partnerships with motorized recreation organizations to help the Forest maintain motorized trails and foster a low-impact conservation ethic.
- b. Establish interpretive messages and programs with the TPA, COHVCO, volunteers and OHV users, including improved signing, information kiosks, and interpretive messaging.

⁹ A copy of this publication has been provided to the Rio Grande National Forest by the TPA/COHVCO. Additional copies are available upon request.

Provide signing and information focused to prevent riders from becoming lost; to show OHV riding and recreational locations; and to identify dangerous and/or closed areas.

8. The Organization's staffs are available and willing to assist the Rio Grande National Forest staff should you have any questions or need additional information. We would like to highlight that our staffs have personnel that are uniquely qualified in the following specialties:
 - a. OHV and snowmobile recreation.
 - b. The Colorado Roadless Rule.
 - c. Forest and timber management.
 - d. Civil Engineering to include road and trail design, alignment, construction and maintenance, construction management, stormwater management and drainage.
 - e. Water Resources Engineering to include erosion and sediment control, hydraulics, floodplain mapping, fluvial geomorphology, low impact development, watershed studies along with stream restoration methods and techniques, stream bank stabilization, and habitat enhancement.

We thank you for reviewing and considering these comments and suggestions. The Organizations would welcome a discussion of these opportunities at your convenience. Our point of contact for this project will be William Alspach, P.E. at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259, e-mail: williamalspach@gmail.com.

Sincerely,



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