



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 - EXECUTIVE SUMMARY**

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.

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 feel that an appropriate goal of returning public access to post fire zones is one year. 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 with hazard trees and snags in close proximity to multiple-use trails and routes being felled.

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 and we ask that multiple-use and motorized recreation be specifically addressed in the General Forest Geographic Area.
- b. We fully recognize that this action proposes to revise and update the Forest Plan is not a Travel Management decision. However, the implications for Travel Management into the future are significant and cannot be disregarded or ignored. “Multiple-use and Motorized Recreation/Travel” should be included into Table 1.4 as an Allowable Activity and the matrix annotated accordingly.
- c. 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 that there are routes that 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).
- d. 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). Conversion of roads to multiple-use, motorized trails could make those routes eligible for Colorado Parks and Wildlife OHV grant funds.
- e. Wilderness Areas. The Organizations do not support any additional Wilderness designated areas within the Rio Grande National Forest.
- f. 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)

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 Forest is vitally important to the preservation and conservation of our public lands and the well being of our citizens.
- b. 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. 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 undervalued¹.

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.*

4. 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.

5. 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 publication². 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.

6. 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. 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.
7. 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.

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.

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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