



November 14, 2016

Gunnison Ranger District,
Attn: Dispersed Camping Comments
216 N. Colorado St.,
Gunnison, CO 81230

RE: Dispersed Camping closures on Tincup pass and in Irwin area

Dear Sirs:

Please accept these comments as the comments of the above Organizations expressing vigorous opposition to the proposed closure of large portions of the Tincup Pass and Irwin areas of the Gunnison Ranger District to dispersed camping opportunities (Hereinafter referred to as "the Proposal"). The Organizations are vigorously opposed to the blanket closures of these areas to dispersed camping and submit that all options must be explored prior to moving forward with blanket closures, as the Organizations are aware that management by closure may look good for an issue in the short term, it rarely is effective in resolving issues in the long run. Rather it has been the Organizations submit that management by closures often results in negative long term impacts to partnerships between land managers and the recreational user communities.

Prior to addressing the specific concerns with the Proposal, a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization seeking to represent, assist, educate, and empower the more than 150,000 registered 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.

The Trail Preservation Alliance ("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 purposes of this document, Colorado Off-Highway Vehicle Coalition and the Trail Preservation Alliance will be referred to as "the Organizations" in this document.

First, the Organizations submit that dispersed camping opportunities are an important component of the high quality recreational opportunities that are synonymous with Tin Cup Pass and the Taylor Park area for a wide range of user groups. Many users strongly prefer the dispersed camping opportunities that are provided on USFS lands over the more intensive camping opportunities provided by private camping sites. They simply want to get away from the hustle and bustle of daily life and are willing to use a generator and carry water for their dispersed camping opportunities to avoid more intensive camping experiences where basic services might be provided. Preserving these high quality recreational opportunities must be the first priority in development of a management plan for the area.

Closures of large areas to all camping simply does not provide protection of these highly valued opportunities or resources in the long term. The closures simply will never stop people seeking to avoid the hustle and bustle of the Front Range every weekend by seeking recreational opportunities on the Urban Interface Forests. Experience has already taught that when an area is closed the recreational users simply move to other areas and they don't stay home. The Organizations are very concerned that we might be having a similar discussion about closing of areas where dispersed camping has moved to after implementation of the closure in the Proposal.

The Organizations are also very concerned that the immediate loss of these opportunities sends the wrong message to the recreational community who have partnered with land managers for extended periods of time to proactively address a wide range of management issues on the GMUG. The Organizations are aware that this partnership has provided hundreds of thousands of dollars in funding directly to land managers on the GMUG in order to provide basic services to all recreational users under the basis that such a partnership was the most effective manner to avoid management by closure type situations. These types of partnerships are only effective when both sides commit to resolving issues in a collaborative manner and work hard to avoid management by closure. Given that management by closure appears to be the first step in addressing dispersed camping in the Proposal area, the Organizations must express serious concerns about the basic direction of the partnership that has proven so effective in addressing a wide range of issues on the GMUG.

The Badger Flats Project provides a great example of management that still provides high quality sustainable camping opportunities.

The Organizations are aware that the visitation to the Tin Cup and Irwin areas has significantly increased over recent years due to the proximity of the areas to large population centers such as Colorado Springs. These increased population pressures have impacted the ability to provide unmanaged dispersed camping opportunities in many other locations, such as in the Badger Flats area of the South Park Ranger District.¹ The Organizations believe that the management direction, mainly site specific analysis and moving to designated dispersed camping sites applied in the Badger Flats area must be explored in the Proposal as it represents a viable alternative to complete closure of these areas. When the issues facing the two areas are compared, the list of management challenges are almost a mirror image of each other.

There can be no argument that the current situation and lack of camping management is creating site specific resource impacts on the Proposal areas. It is also without contest that extensive opportunities are available in areas where resources are **not** negatively impacting resources and these areas represent viable resources designation of camping sites along routes in the Tin Cup Pass area. The Organizations are also aware that many sites could be subject to minimal maintenance and educational efforts for users and public access to the site could be continued. The Organizations submit these opportunities must be fully utilized in the designation of camping sites. The Organizations would note that the Badger Flats proposal has been partially funded with CPW OHV grants in order to inventory the areas and develop a plan that designates sites where resources are not impacted and to provide maintenance of these designated sites moving forward.

Any opportunities that might be lost due to closures of dispersed camping should be replaced with designated sights in the area as there currently is a shortage of camping opportunities in the area.

The Organizations vigorously assert that any camping opportunities that are lost on the Tincup/Irwin areas must be replaced with dispersed camping opportunities within the planning area. The Organizations are aware that levels of recreation have increased in the Proposal area as a result of its proximity to major population centers. These impacts have been compounded by the complete closures of other locations that had previously provided dispersed camping opportunities to the public in the vicinity of the planning area. The Organizations submit that such increases on the opportunities provided by sites in the Proposal, as a result of the closures

¹ The documentation regarding the Badger Flats proposal are far too extensive to include in these comments but can be accessed at <http://www.fs.usda.gov/project/?project=48069>

in other locations is proof that the management by closure policy being applied in the Proposal area simply does not work. The Organizations submit that land managers should develop a plan for sustainable opportunities in the Proposal area rather than push usage to other areas, that are not equipped to provide opportunities, which will result in further resource impacts and the long term closure of the areas where usage is pushed too. This is simply unacceptable to the Organizations because opportunities are lost and resources are impacted.

Educational materials should be developed to mitigate impacts and preserve access.

The Organizations welcome the references in the scoping notice regarding the development of educational materials as part of the Proposal. The Organizations submit that educational materials are simply not being correctly directed under the Proposal. Rather than educate the public regarding lost opportunities, the Organizations submit that educational resources should be directed towards use of designated sites in the area and other areas where designated camping sites can be found. Moving the public to other areas where unmanaged camping opportunities are provided will not provide a long term management solution to the dispersed camping usage. The Organizations vigorously submit that the public wants to do the right thing on public lands and when they are informed of what the right thing is the public will overwhelmingly comply with those educational materials.

Conclusion.

The above Organizations are expressing vigorous opposition to the proposed closure of large portions of the Tincup Pass and Irwin areas of the Gunnison Ranger District to dispersed camping opportunities in these comments. The Organizations are vigorously opposed to the blanket closures of these areas to dispersed camping and submit that all options must be explored prior to moving forward with blanket closures, as the Organizations are aware that management by closure may look good for an issue in the short term, it rarely is effective in resolving issues in the long run. Rather it has been the Organizations submit that management by closures often results in negative long term impacts to partnerships between land managers and the recreational user communities. Rather than manage by closure, the Organizations vigorously assert that the management planning exemplified in the Badger Flats area must be explored as an alternative to the current proposal, as the Badger Flats model provides better recreational opportunities and far better resource protections in the long run.

Please feel free to contact Scott Jones at 518-281-5810 or via email at scott.jones46@yahoo.com or traditional mail at 508 Ashford Drive, Longmont CO 80504 if you

should wish to discuss these matters further or if you should wish to have further information regarding these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Don Riggle".

Scott Jones, Esq.
COHVCO/TPA Authorized Representative

D.E. Riggle
Director of Operations
Trails Preservation Alliance