



May 4, 2017

Royal Gorge Field Office
3028 E. Main St.
Cañon City, CO 81212

**Bureau of Land Management - Eastern Colorado RMP
Comments**

Dear Members of the Management Team for the Eastern Colorado RMP:

Please accept these comments regarding the Bureau of Land Management - Eastern Colorado RMP 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 offer the following comments and concerns regarding this project and will focus our comments primarily on Travel Management topics.

1. We acknowledge that the BLM in Eastern Colorado has wrestled with some propagation of non-system trails on BLM lands. However, we feel much of this stems from an increasing need and demand for multiple-use recreational opportunities on public lands in general and especially near urbanized areas along the Front Range of Colorado. The Decision Area of the Eastern Colorado Resource Management is unique in that most of the area is within close proximity to major population centers along Colorado's Front Range. 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 lands managed by the BLM. 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, please consider roads and trails as critical infrastructure for recreation.

2. The economic impacts of multiple-use and motorized recreation within the counties and communities encompassed by the BLM lands included in the Eastern Colorado Resource Management Plan cannot be overlooked. Many of the visitors that choose to visit these BLM lands combine their recreational activities and often include using BLM 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 the lands included in the Decision Area as the public travels to and from their valued destinations within the BLM managed lands. 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 season². As popular as motorized recreation is within many of the lands managed by the BLM, the economic benefits to local economies and nearby communities must not be undervalued by the Eastern Colorado Resource Management Plan.
3. The Organizations believe that continued multiple-use access and motorized recreation within the lands managed by the BLM is vitally important to the preservation and conservation of our public lands and the well being of our citizens, and easily fits with the BLM's mission to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations. 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 BLM to protect our public land 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. The organizations feel that this project must work diligently to ensure that a balanced spectrum of opportunities are provided in the Eastern Colorado Resource Management Plan to properly serve the diverse cross section of our population and meet their recreational needs. This Eastern Colorado Resource Management

¹ DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

² DRAFT Economic Contribution of Off-Highway Vehicle Recreation in Colorado, July 2016

Plan must fairly and adequately improve the management of motor vehicle use while providing an Environmentally, Economically and Socially sustainable end state.

4. 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 BLM lands 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 public lands managed by the BLM. 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 assistance to access the places we all enjoy and cherish.
5. With few exceptions, the roads and trails within the Eastern Colorado Resource Management Plan 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 public lands access value.
6. The Organizations feel the following general comments are important and relevant to the Eastern Colorado Resource Management Plan in meeting the purpose of this project along with protecting the environment and minimizing impacts:
 - a. We feel it is important to spotlight the following principles regarding multiple-use recreation and are important considerations when evaluating any modifications to the existing routes and networks³:
 - i. Generally visitors participating in multiple-use activities on BLM lands will use routes that exist and adequately satisfy their needs and desires.
 - ii. 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.
 - iii. 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 public lands visitors must use the same route in both

³ Management Guidelines for OHV Recreation, National Off-Highway Vehicle Conservation Council, 2006

directions (e.g., access to dispersed camping sites, overlooks, historic sites, etc.). However, even in these cases, loop systems will always provide better experiences.

- iv. Adequate legal parking and dispersed camping areas are necessary to fulfill the needs and desires of the motorized recreation community

- b. Not all dead end roads are necessarily of low value and in need of closure. Many dead end spurs and “low value” routes provide access to picnic areas, dispersed camping sites, overlooks, etc. Although the values of these roads is less than that of main roads, connectors and loops, (i.e., “higher value” routes) their individual, overall benefit and value must be individually considered. We acknowledge that these roads will likely not generate much positive public interest and comment, however these routes can still have substantial importance to the public.

- c. Duplicative roads and trails may on the surface appear redundant and not needed. This is often the cry from those unfamiliar with multiple-use and motorized recreation (an activity some of those individuals choose not to participate in) or simply seeking to eliminate or reduce public use of these routes. However, we would challenge that some duplicative routes may in fact offer unique benefits for distributing the use rather than concentrating use to a single route or may offer looping and other recreational opportunities. Therefore, any proposed route closures need to be evaluated not only at the level of the individual route or habitat, but also at a broader level of evaluating where a potential closure would displace affected users to and the resultant impact to both/all areas.

- d. “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 certainly subjective. Very few will be able to enjoy BLM Lands and all of the resources these lands have 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.

- e. The Organizations would offer that the BLM should shift from an attitude and policy of segregating users and providing infrastructure for select groups at the cost of others, the landscape is just not big enough for each and every user group (i.e. hikers, mountain bikes, equestrians, motorized users, etc.) to have their own exclusive set of trails and associated infrastructure. The BLM can set the example in the Eastern Colorado Resource Management Plan for the coexisting of users, promoting tolerance and diversity of users on true multiple-use trails.

- f. An adequate network roads and trails on BLM lands will be necessary to provide access in times of emergency. The BLM is one of country's experts 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. The 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 public lands nor the public. The demand for more and more closures of multiple-use and motorized access is often based upon self-serving desires and an unwillingness to share our natural resources with others, intolerance of mixed public lands uses and an unwillingness to coexist in our individual pursuits of recreation. Likewise the premise that decommissioning roads will reduce human caused fires is absolutely unfounded and unsubstantiated and should not be utilized as criteria for any decisions regarding the elimination or closure of any multiple-use or motorized route.
- g. 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 some lands included in the Eastern Colorado Resource Management Plan and does not support a premise for closures and reductions in multiple-use recreational opportunities.⁴ 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).⁵ Likewise research by Connor, White and Freddy in 2001 has even demonstrated that elk population increases on private land in response to hunting activities.⁶ 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.

⁴ Wildlife Response to Motorized Winter Recreation in Yellowstone, 2005 Annual Report, White, Davis & Borkowski

⁵ Rumble, Mark A; Benkobi, Lahkdar; Gamo, Scott R; 2005. Elk Responses to Humans in a Densely Roaded Area; Intermountain Journal of Sciences

⁶ 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

- h. The Organizations are aware of demands regarding a perceived inadequacy of the BLM to provide enforcement of regulations pertaining to multiple-use and motorized recreation in particular. We would challenge that based upon several studies, pilot projects, etc. by the Colorado Parks and Wildlife Division, the USFS and the BLM to analyze if indeed an enforcement issue exists, and without exception those projects have shown there are minimal problems due to a lack of enforcement. Unauthorized off-route travel can be an issue for law enforcement, but the answer for this comes by providing an adequate system of routes that meets the needs of the motorized recreation community. The State of Colorado's OHV funds have been used to subsidize law enforcement programs and the detailing of law enforcement officers to OHV areas only to come back with consistent results that this cry for the need for enforcement is unfounded, unsubstantiated and just plain inaccurate. In 2011 the Colorado Parks and Wildlife Division initiated an OHV Law Enforcement Pilot program to address the accusations, questions and concerns raised by critics of OHV recreation on public lands in Colorado. The data and observations gathered from this Pilot program in 2011, 2012, and 2013 repeatedly demonstrated excellent compliance with OHV rules and regulations throughout Colorado by OHV users. It was estimated that over 10,000 individual OHV users were stopped and inspected during the Pilot Program and 94% of those users were found to be fully compliant with Colorado OHV laws and regulations.⁷
- i. Sound. Motorized and non-motorized uses are equally legitimate uses of public lands and especially on BLM roads and multiple-use/motorized trails. Sound from motorized use is to be expected in areas open to motorized use. The Organizations would offer that the State of Colorado already has strict standards for any and all sound emanating from OHV's. This very detailed standard has proven to be effective since 2006 and governs vehicles produced as far back as 1971. OHV users themselves have funded efforts to educate, test and "police" themselves for sound level compliance. We feel that complaints of noise and demands for sound reduction are once again unfounded and will often be used as a selfish excuse to try and reduce or eliminate motorized access and use of public lands.
- j. Climate Change. There has been little actual research quantifying how outdoor, public lands 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 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 public lands recreation, and how to properly address effects (if indeed there are any) remains a fledgling science at

⁷The 2014 Off-Highway Vehicle Law Enforcement & Field Presence Program, Colorado Parks and Wildlife Division, March 2014

best, and subject to individual opinions. As a change in climate occurs (as it has in the past) there is no doubt that the ecosystems on BLM lands will adapt and our socioeconomic habits and factors will also change and adapt. To restrict or limit accessibility and the recreational use of lands included in the Eastern Colorado Resource Management Plan would be impulsive, unjustified, reckless and impossible to enforce. The sheer growth of our population, uncertainty about incomes and spending, changes in future building materials, and the demand for natural resources (domestic and imported) just to name a few will likely have far more impacts on lands managed by the BLM compared to the effects of climate change. Minor adjustments to BLM 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.

7. The TPA, along with COHVCO, fully intends and hopes to be a cooperative and constructive partner with the BLM as the Eastern Colorado Resource Management Plan continues forward.

We thank you for reviewing and considering these comments and suggestions. The Organizations would welcome a discussion of these comments at your convenience. Our point of contact for this project will be William Alspach, PE at 675 Pembroke Dr., Woodland Park, CO, cell 719-660-1259.

Sincerely,



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