



May 16, 2017

Gunnison Field Office
Att: Jim Lovelace
210 West Spencer Ave, Suite A
Gunnison CO 81230

RE: Signal Peak Trails Plan

Dear Mr. Lovelace;

Please accept this correspondence as the comments of the above Organizations with regard to the Signal Peak Trail Proposal. At the landscape level, the Organizations vigorously support two foundational principals: 1. that development of multiple use trails; and 2. trails should not be developed only to benefit a small user group. These foundational principals cause serious concerns with the specific trail development allocation in the Signal Peak Proposal, especially when the Gunnison FO has had such success with multiple use areas such as the Hartman Rocks area. **The Organizations vigorously support the development of multiple use single track trails in the Proposal.** While we support the multiple use trails there is serious concern with both the basic need and direction that has been adopted for the management of other routes in the Proposal. There simply needs to be a far more balanced allocation of routes being developed. This balance can be achieved by allowing multiple use on routes proposed or by working with local motorized users to determine where additional trails would be appropriate.

The development of what is essentially an advanced mountain bike trail network is very concerning in the Proposal given the tenuous position of funding for all recreational activities on federal lands, the heavy usage of the Signal Peak area already, limited benefit from the trail network to the overall recreational experience in the area. The Organizations would note that single track trail is some of the most sought after recreational opportunities and also some of the hardest to find in Colorado due to very limited amounts being available. It is the Organizations position that if trails are developed in the Proposal area, they must be overwhelmingly multiple use, as there is simply insufficient funding available to allow each user

group to have a separate trail system on public lands and such a model does not reflect the multiple use model in place on public lands.

Prior to addressing the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization the 150,000 registered OHV users in Colorado seeking to represent, assist, educate, and empower all 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 for trail riding to receive a fair and equitable percentage of access to public lands. For purposes of this document COHVCO and TPA are identified as "the Organizations".

1a. History.

The Organizations are very familiar with the recreational opportunities that are provided by the Gunnison Planning area and the heavy utilization of these opportunities that is currently being experienced for all recreational activities when compared to even 5 years ago. The Proposal references the significant increases in all types of usage for this area in the introduction and this increased visitation would be consistent with our experiences. It has also been our experience that usage of this area is from a widely diverse group of users including the OHV community, those camping, fishing, picnicking and generally relaxing. It has been the Organizations experience that the Gunnison Planning is an overwhelmingly multiple use area. The Organizations must also state that it has been our experience that while there are clearly mountain biking visitors to the Gunnison Planning area, this visitation is certainly not disproportionate to other usages of the area. It has also been our experience that most of the mountain bikers utilizing the Gunnison Planning area are families and at best intermediate riders. The Organizations are very concerned that while the expanded usage of the area for a very small user group is identified, the Proposal simply never addresses how the basic management issues is the Signal Peak area will be improved when the Proposal is implemented. The Organizations submit that any project in this area must benefit all users as this is truly a multiple use area.

The Organizations must express a high level of frustration at both the lack of funding for development and operation of the trail network. Merely drawing routes on a map does not make a successful trail network in the long run. The Organizations are further concerned that the desires of a small user group have been placed well ahead of other long term partners who have directly funded and supported the greater good of all recreational usage in Colorado for decades. The Organizations have been highly supportive of a wide range of programs and efforts through the CPW trails and OHV grant programs, such as the law enforcement program and good management crews, which directly fund more than \$8,000,000 per year to land managers to benefit all recreational efforts. We are aware that the Gunnison Field Office has participated in each of these programs for an extended period of time. The multiple use organizations have also been annually identified as the single largest source of volunteer labor for trail maintenance.

While the Organizations are aware these efforts are targeting all recreational usage, the Organizations would expect that all other user groups would be brought into alignment with the concept of greater good of recreation in their proposals. If one partner is forced to pay the lion's share of the bills and others are allowed to develop proposals that exclude the other partner, that is simply not a partnership. This type of alignment simply has not been provided in this Proposal given the overwhelming benefit of the Proposal to a single user group.

1b. The continued large scale expansion of single user group trails is creating significant user conflict in areas where there has not been conflict before.

The Organizations vigorously assert that motorized single track is one of the most sought after recreational experiences in the state due to the limited number of miles available. Frustration at intention exclusion of numerous user groups from development of the Signal Peak initial project Proposal.

"Motorized vs Non-Motorized Gunnison Trails prefers that the proposed singletrack trails in the Signal Peak trail system be non-motorized. However, this determination will be made exclusively by the BLM. The BLM also asked Gunnison Trails to confine outreach to Gunnison Trails constituents and not try to engage the broader interested community, including motorized trail users and sportsmen."¹

The Organizations must express high levels of frustration at the intentional lack of collaboration on the development of this Proposal as in many areas collaborative efforts that are supported

¹ See, Gunnison Trails - Signal Peak Master Plan December 2016 at pg

by the land managers have been effective at developing a quality recreational opportunity that can be supported by all and avoiding unnecessary conflict between users, such as the Gunnison FO has shown with the Hartman Rocks area. The Grand Valley Trails Alliance in Grand Junction would be another such collaborative effort. When single usage trail proposals are moved forward without significant collaborative efforts across user groups that have already partnered, the progress across user groups from efforts such as Hartman Rocks can be lost very easily.

The Organizations are also concerned that the entire Gunnison Planning area has been managed as designated routes for motorized and mechanized since 2010.² As a result of this decision there is significant concern that we are moving many illegal non-system trails on to the system in direct contradiction of decisions to close these routes as they are illegal in many instances. Again this type of a decision could easily be construed as favoring one group over another and create user conflict that is entirely unnecessary.

The Organizations would like to be able to support all trails proposals from all user groups but this simply is not realistic given agency budgets and the unwillingness of many user groups to self tax in a manner similar to the programs that have been in place as a result of the motorize users self taxing a long time ago. This failure to provide a funding stream for site development has impaired these user groups ability to partner in development of projects such as the project now sought to be developed. Collaboration of all user groups, such as has already occurred in the Hartman Rocks area, is the model we feel will be the norm moving forward.

1c. More than 2 dozen communities have opened all or part of their county road network since passage of HB 1030 two years ago.

The Organizations are also aware that many communities (almost all) in the GFO planning area have voted to open all or part of their county road network to OHV travel and this list is growing daily. A complete list of these communities is included with these comments for your reference. The Organizations submit that these decisions express a clear desire in these communities to embrace all recreational opportunities. These communities have noted significant economic drivers for local businesses and expanded tax revenue. They have not noted major negative impacts from the expanded access, such as ordinance violations, noise or other concerns. Clearly there is a demand for OHV opportunities in Colorado.

2a. Funding must be identified for development and management of the proposed trail network.

² <https://www.blm.gov/press-release/blm-finalizes-supplemental-rules-gunnison-basin-travel-management-plan>

The Organizations are aware that there is a funding crisis in terms of recreational activities on public lands and the motorized community is the only user group that has partnered with federal land managers to attempt to offset these issues. These efforts have resulted in a program that is approaching an annual budget of \$8 million annually that overwhelmingly benefits federal land managers from the registration of OHVs. The motorized community has also been consistently identified as the largest source of volunteer labor for maintenance and development of trails in Colorado. No other user group has approached this type of active support for recreation. Given the current funding situation for federal land managers, the Organizations must express serious concerns when funding for both development and maintenance for all facets of any Proposal is not clearly identified.

The lack of funding for trail systems and recreational usage of public lands is an issue that has been extensively addressed in recent years. A GAO review of the USFS has identified that there is a \$314 million dollar national backlog on trail maintenance on USFS lands.³ The GAO also concluded that only 25% of the existing trail network is financially sustainable. While this report specifically identified the major role that OHV grant programs play in mitigating this issue, the report specifically found that a lack of funding for non-motorized trails is a major contributor to the issue. While the GAO report does involve analysis of issues not relevant to the current proposal, like trail maintenance in Wilderness, the basic determination of the report must not be overlooked. Routes that are exclusively non-motorized are entirely unsustainable financially and the OHV communities efforts in maintaining multiple use routes is an important tool in addressing this issue. It is the Organizations position that the current proposal exacerbates a known and unresolved problem and fails to integrate a known and effective funding source. This simply makes no sense.

In addition to the GAO report, the Organizations are also aware that many other user groups have identified the complete lack of funding for basic maintenance that is currently facing trails in Colorado. The Colorado 14ers group recently issued a statewide report card that gave front range trails to 14,000 ft. peaks a "D" in terms of maintenance.⁴ While volunteers have worked hard on these trails, this report again highlights the need for ongoing funding to support these trail networks. If existing non-motorized routes are not being maintained with volunteers, the Organizations must question why this model would be allowed to be the basis for new trail development. The basic model appears to be broken. The Organizations submit that making

³ See, Government Accountability Office report to Congressional Requestors GAO-13-618; *Forest Service Trails- Long and Short term improvements could reduce maintenance backlog and enhance system sustainability*; June 2013 at pg.

⁴ http://www.14ers.org/wp-content/uploads/SustainableTrails-14er-Report-Card-Final-6.9.2015_Page_1.jpg

these routes multiple use would expand volunteer support and directly make significant funding available to perform basic maintenance and off-set operational expenses.

2b. Soils in the Gunnison Planning area are decomposed granite and will need ongoing maintenance.

The Organizations are aware of several mountain bike only proposals that have been built and then not maintained in Colorado already as was expressly recognized by BLM representatives in recent news coverage of the Oil Well Flats trail system outside Canon City⁵ Weekly trash removal and toilet cleaning are often projects not well supported by any volunteer community. The Organizations submit that directing funds to a project that has not been clearly identified as successful is putting those limited funds at risk of loss if the project should fail.

The Organizations are very familiar with the Gunnison Planning area and are aware that most of the soil is made up of decomposed granite. The Organizations are aware that even the best designed trails are going to need ongoing maintenance in these soil conditions and that without maintenance the Signal Peak area could quickly proceed the direction of the Oil Well Flats network and this would be unfortunate as there is such a broad scale demand for recreation in Colorado and limited funds.

3a. The purpose and need of the Proposal does not reflect limited demand for bicycle routes on federal public lands.

Compounding the Organizations concerns about a lack of funding for the project is the fact that the Proposal provides a very grim picture when looked at purely from a cost/benefit analysis for any money that might be available from the agency. The Organizations must question that even if agency funding is identified for the Proposal, is the development of an extensive trail network for the benefit of a very small user group the best allocation of the funding. We submit that it is not as the benefits of the Proposal are very limited for most users as the overwhelming percentage of visitors to the Gunnison Planning area are multiple users and not dedicated mountain bikers.

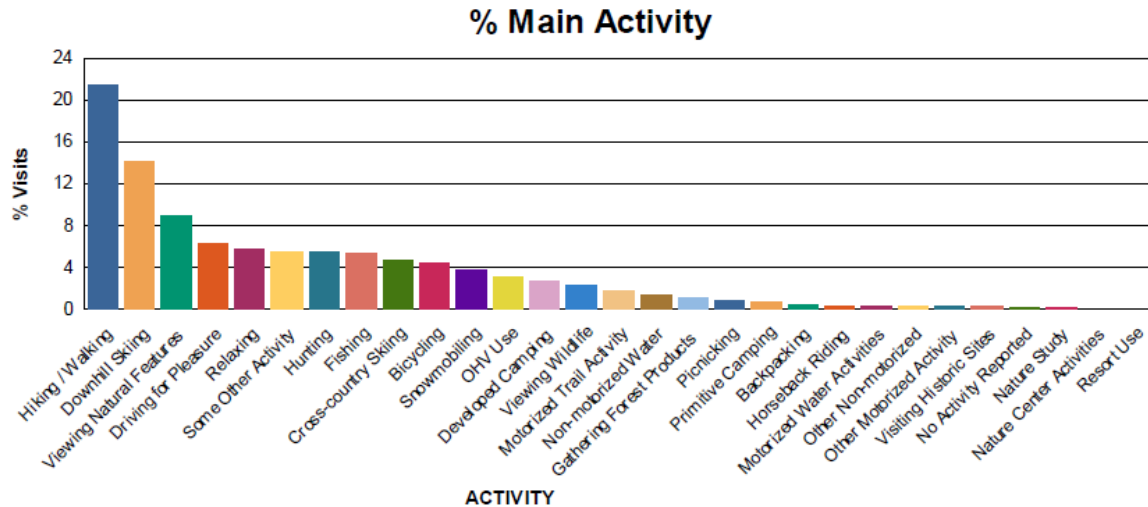
The Organizations are aware that the USFS has an active monitoring system in place for the monitoring of all types of recreational visitation to public lands. This information is now highly relevant to adjacent BLM lands as USFS and BLM have adopted an interagency memorandum adopting NVUM as the official visitation measure on both USFS and BLM lands.⁶ A review of

⁵ <http://gazette.com/mountain-bikers-taking-notice-of-new-cycling-hot-spot-in-southern-colorado/article/1571878>

⁶ A summary of these efforts is available here:

http://www.blm.gov/wo/st/en/prog/Recreation/national_recreation/visitor_use_surveys.html

this information at the regional level reveals that **ALL** bicycle usage is 10th on the list of why people visit federal lands. The 2014 regional level NVUM research provides the following breakdown of visitation to federal public lands:



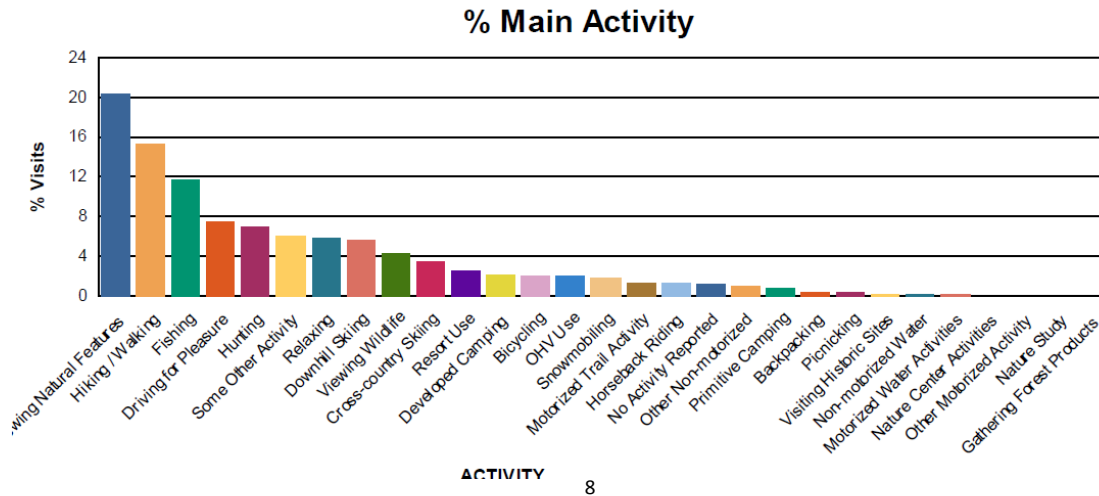
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Given that all bicycle usage is 10th on the regional list of reasons people visit federal public lands, the basic direction of the Proposal seeking to primarily benefit a small user group becomes an immediate cause for concern as almost every other user group ahead of bicycle users on the visitation scale is excluded from using the proposed trail network. This makes any cost benefit or compelling need for single use trails difficult to justify as research indicates there are not a lot of users seeking these opportunities in the region.

The Organizations submit that a major reason for the low visitation of bicycle users to federal public lands is that many local communities have developed high quality bicycle based recreational opportunities with greenway trails and urban corridor based trail systems. While local communities have been very effective in developing these bicycle based opportunities, the desired recreational experiences of many other users groups simply do not match well with recreational opportunities in these urban interface areas. Given the large opportunity for this type of recreation already in place, many of the public simply own bicycles that are not able or not well suited to be ridden off a paved or smooth hard surface trail. Many of the public simply have limited desire to ride in the backcountry due to their desire to ride with family members making opportunities on federal lands a poor match to the recreational opportunities they are seeking.

⁷ See, USDA Forest Service; National Visitor Use Monitoring Report for USFS Region 2, Round 2, Last Updated May 23, 2012 pg 21.

As the Organizations have already identified, there is limited demand for bicycle opportunities on federal public lands in the region, which will result in limited benefit from a single user group trail network. When more localized data is reviewed, the NVUM research clearly indicates that demand for bicycle recreation is lower on the Pike/San Isabel NF than it is on the regional level.



Given the comparatively low demand for bicycle trails on federal public lands, the Organizations vigorously assert that the current allocation of routes simply cannot be defended when it is looked at from a cost benefit analysis. The Organizations submit that the purpose and need of the project must be realigned to reflect the multiple use nature of the area and to return a positive cost benefit analysis of any agency money that might be allocated to the project. Research simply does not support the current allocation of routes.

3b. Benefits from the Proposal will be further limited by the advanced nature of the trails to be developed.

The possible benefit of the Proposal to the general public becomes more of a concern when the nature of the trails to be developed are reviewed. Many of the public own bicycles and frequently use them for recreation, but most are far from a more or most advanced type of rider. While most bicycle users are intermediate at best, the overwhelming portion of the trails to be constructed are “more advanced” or “most advanced” given the longer loops and somewhat remote nature of the trails. This means that the overwhelming portion of the public will simply be unable or not equipped to ever traverse these routes. Again this small target market gives the Organizations significant concerns that any funding that might be directed towards the project would result in very limited benefits. Given the huge demand for opportunities in the Gunnison Planning area and budget issues facing federal land managers,

such an allocation of resources should be a concern. Any federal funding must be applied in a manner that benefits the most users. It is the Organizations position that a multiple use trail network in the area would significantly alter the cost benefit analysis in favor of developing a network.

3c. A lack of access is a major barrier to Hunters in the Gunnison Planning area as well.

The National Shooting Sports Foundation recently released an extensive study on the factors limiting persons from entering or continuing to participate in hunting related activities. The NSSF report specifically concluded a lack of motorized access is the single most important factor for agency influence, stating as follows:

"Difficulty with access to lands for hunting has become not just a point of frustration, but a very real barrier to recruiting and retaining sportsmen. Indeed, access is the *most* important factor associated with hunting participation that is not a time-related or demographic factor—in other words, the most important factor over which agencies and organizations can have an important influence (Responsive Management/NSSF, 2008a)."⁹

The NSSF report also specifically identified that motorized access is largest mode of hunting transportation, as the following percentages of hunters relied on the following modes of transportation:

1. Car & truck 70%
2. Walking 51%
3. ATVs 16%¹⁰

The NSSF report further found that 56% of hunters experienced hunting related restrictions due to limitations on motorized access and that 54% of hunters states that closures of public lands by government agencies. Similar sentiments to the NSSF report are echoed by the CPW herd management plans for both deer and elk in the planning areas, which identify that continued limitations on access due to private land development are a major concern.¹¹

These are issues that could be resolved in the Proposal area by addressing true multiple use recreational access issues, rather than advancing a single user group. The Organizations would

⁹ See, National Shooting Sports Foundation; Issues related to hunting access in the United States; Final Report 2010 at pg 7. This document will be referred to as the NSSF report for purposes of these comments.

¹⁰ See, NSSF Report at pg 56

¹¹ See, Colorado Parks and Wildlife; Jack Vayhinger CRIPPLE CREEK DEER MANAGEMENT PLAN DATA ANALYSIS UNIT D-16; GAME MANAGEMENT UNITS 49, 57, 58, 581 November, 2007.

note that any bike related travel means failed to make this list of hunter related transportation devices. The Organizations would note that mountain biking only routes will result in a minimal benefit to the hunting community, as these routes would be very difficult to retrieve game across.

4a. OHV recreation is a major economic driver for local Colorado communities as research indicates more than \$2.3 billion in economic contribution.

The Organizations have included a copy of the new released research done regarding the economic benefit of OHV recreation to Colorado communities. This study performed in partnership between COHVCO, the US Forest Service, BLM and Colorado Parks and Wildlife found that more than \$2.3 Billion in economic contribution results from OHV recreation which results in more than 16,000 jobs and more than \$100 million in badly needed tax revenue to local communities. This research concluded that more than \$322 million is spent in the GFO planning area on motorized recreation which accounts for more than 3600 jobs and more than \$53 million in tax revenue to all forms of government.¹²

Multiple use access is a major factor involved in many other activities, such as hunting, fishing and private lands ownership. By limiting the scope to just mountain bike trails, the economic benefit of any new trails in the planning area is artificially limited and limits the amount of resources that might be available to support the area long term.

BLM scoping documents clearly identify that economic benefits to the Signal Peak area are also an objective of the Proposal. Again the Organizations must question how the Proposal relates to this objective as the Organizations are intimately aware that for an activity to be an economic driver, the resource must be utilized by a large number of visitors and these visitors must spend money. The Organizations are very concerned that accurate economic analysis be relied on for the proposal as resources that might be otherwise available for multiple use recreation are being diverted towards the Proposal in a manner that simply will never achieve this goal. As the Organizations have already identified, extreme mountain biking is not a large sport in terms of the number of participants. When the spending profile of the mountain biking community is addressed, there are many other user groups that spend far more per day than mountain bikers who will be excluded from the trail network. These issues directly undermine any chance of the Proposal becoming a true economic driver.

¹² See, Pinyon Environmental; *Economic Contribution of Off-Highway Vehicle Recreation-2014-2015 Season in Colorado* at pg 20.

The Organizations are intimately aware that multiple use is true driver. The Colorado Office of Tourism has also undertaken a review of the economic contribution of tourism in the planning area. This report found that multiple use tourism results in Chafee County alone results in \$82 million in revenue and 995 jobs.¹³ CPW undertaken a review of the economic contributions of hunting and fishing in Colorado which determined that \$55 million in spending and 385 jobs result from these activities in the Gunnison Planning planning area.¹⁴ The hunting and fishing community has also identified that a lack of access is the single largest barrier to the development of new participants in hunting and fishing and also the largest barrier to those wanting to undertake these activities. These are user groups that currently would basically be precluded from obtaining any benefit from the Proposal.

As part of the NVUM process the USFS has a developed analysis process for comparative spending profiles of recreation activity and visitation in the NVUM analysis process. The low levels of visitation to federal public lands from mountain bike recreation has already been addressed in previous portions of these comments. The conclusions of NVUM research regarding the comparative spending profiles of user groups are summarized as follows:

Table 3. Visitor spending for high, average, and low spending areas by activity, \$ per party per trip (\$2007)

Activity	Non-Local Day Trips			Non-Local Overnight Trips ^a			Local Day Trips			Local Overnight Trips ^a		
	Low	Avg	High	Low	Avg	High	Low	Avg	High	Low	Avg	High
Downhill skiing	\$126	\$130	\$181	\$468	\$798	\$893	\$68	\$64	\$69	\$359	\$386	\$489
Cross-country skiing	\$87	\$97	\$135	\$315	\$537	\$951	\$26	\$27	\$31	\$242	\$259	\$329
Snowmobile	\$116	\$129	\$180	\$377	\$642	\$1,139	\$72	\$74	\$74	\$289	\$311	\$394
Hunting	\$79	\$88	\$122	\$253	\$368	\$652	\$41	\$51	\$51	\$230	\$248	\$314
Fishing	\$52	\$55	\$77	\$214	\$331	\$548	\$36	\$38	\$38	\$154	\$161	\$205
Nature-related	\$56	\$65	\$90	\$269	\$473	\$826	\$36	\$37	\$42	\$182	\$195	\$247
OHV-use	\$98	\$109	\$151	\$219	\$277	\$491	\$63	\$58	\$58	\$125	\$134	\$170
Driving	\$42	\$54	\$75	\$338	\$576	\$1,021	\$28	\$32	\$30	\$259	\$278	\$353
Developed camping	n/a	n/a	n/a	\$183	\$206	\$300	n/a	n/a	n/a	\$178	\$171	\$217
Prim. camping/bpack	n/a	n/a	n/a	\$108	\$134	\$196	n/a	n/a	n/a	\$121	\$120	\$153
Hiking/biking	\$53	\$50	\$64	\$228	\$473	\$765	\$20	\$21	\$18	\$126	\$150	\$190
Other	\$60	\$72	\$100	\$216	\$330	\$569	\$36	\$40	\$32	\$170	\$187	\$237
Total	\$58	\$65	\$90	\$214	\$366	\$648	\$34	\$34	\$29	\$165	\$177	\$224
Ratio to average	0.90		1.39	0.59		1.77	0.98		0.84	0.93		1.27

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The Organizations vigorously assert that these spending conclusions support significantly lower economic benefits from mountain bike recreation and correspond to the significantly higher

¹³ See, Colorado Tourism Office Study Dean Runyan and Associates at pg. 38.

¹⁴ See, CDOW study the economic impact of hunting, fishing and wildlife watching performed by BBC Research and Consulting (September 2008) section IV at pg 16.

¹⁵ See, UDSA Forest Service NVUM Analysis; Stynes and White; Updated Spending Profiles for National Forest Service Visitors by recreational activity; November 2010 at pg 6.

economic benefits that accrue from other visitation to the planning area. The Organizations submit that creating a single use trail network for a small user group that spends significantly less than the user groups that are being excluded will not result in the activity being an economic driver. Rather this type of planning could actually result in lower economic benefits flowing to the planning area after the proposal.

Many motorized and multiple use trail based projects have been highly effective in driving local economies, such as Paiute Trail System in Utah and Hatfield McCoy Trails in West Virginia. The Paiute Trail System has experienced over \$1 million in annual contribution from the trails network and the Hatfield McCoy trail network provides approximately \$8 million per year to those local communities. Given the concrete contributions of these highly successful multiple use trail projects, the Organizations would be hesitant to support the projected \$81 million that the Proposal asserts as a benefit, given these differences and the differences that are clearly evident between this estimate and the benefits that have accrued to the City of Whisler. Again the Organizations believe this type of accurate information and analysis is the cornerstone to any partnerships that might be developed in the future.

4b. Economic analysis of mountain biking recreation must be carefully reviewed.

The Organizations are very aware that the mountain biking community likes to rely on an economic contribution study from Whisler BC to establish that mountain bike based recreation is a significant economic driver. The Organizations have reviewed this document and have serious concerns regarding the relevancy of this document to most trails development proposals and that the study often is simply not accurately summarized.

The Organizations obtained a copy of the Western Canada Mountain Bike Study of mountain bike recreation ("Whisler study") that was the basis for the economic analysis portions of the Proposal. A complete copy of this study has been included with these comments for your review. After reviewing the Whisler Study, the Organizations are very concerned about the accuracy of the contributions estimated in the Proposal, as the Whisler conclusions that generate contributions at \$133 per day are based on significantly different types of recreational activities than the usage to be developed in the Proposal. The Organizations believe the Proposal has provided significantly misleading economic analysis by not correlating the usages addressed in the Whisler Study with the usages in the Proposal.

A brief outline of the Whisler Study will exemplify these concerns. The Whisler Study addressed four distinct riding areas and recreational mountain bike experiences in and around Whisler,

BC. The Study refers to these areas as the Whistler Bike Park, Whisler Valley, Squamish and the North Shore and briefly summarizes these areas as follows:

"Trails on 'the Shore' are challenging for even the most experienced freeriders, Squamish has a multitude of trails for epic cross-country rides as well as freeride trails. Whistler features both cross-country trails throughout the Whistler Valley and the Whistler Bike Park features 44 lift accessed downhill trails for all skill levels."¹⁶

The Whisler study specifically states that the Whisler Bike Park is significantly different recreational experience than the other three riding areas and that there is little cross over between users of the Whisler Bike Park with other areas. The Organizations do not contest that Whisler Bike Park generates \$16.5 million annually as a result of the 44 lift accessible bike runs and that this spending accrues at an average rate of \$133 per night per user.¹⁷ The Organizations do question the relevance of these conclusions to the Proposal, as the Organizations are unable to find any reference to the use of ski lifts or other high developed facilities available in the Proposal area.

The Whisler study clearly finds there are very different levels of economic contribution that result from usage of the other three riding areas that are far more relevant to the Proposal in terms of levels of development. The economic benefits that result from the less intensively developed trail network in the Whisler area only results in \$10.3 million in economic benefit,¹⁸ which accrues at significantly lower per day rates (\$39 to \$93) than more intensive development and usage.¹⁹ These spending profiles range from 25% to 70% of the estimates that are relied on for all usage in the Proposal. The Organizations vigorously assert that the economic contributions of the Proposal must be based on the spending profiles found in the less developed areas researched in the Whisler analysis as this most accurately reflects the direction and intent of the Proposal.

4c. Single use trail development projects have had limited success as an economic driver.

The Organizations are aware that many communities have targeted an overly narrow vision for economic development based on downhill mountain biking and that these economic development projects have become somewhat less successful than anticipated. Several such

¹⁶ See, Western Canada Mountain Bike Tourism Association; *Sea to Sky Mountain Biking Economic Impact Study- Overall Results* (undated) at pg 5. For purposes of these comments this document will be referred to as the Whisler Study.

¹⁷ See, Whisler Study at pg 5.

¹⁸ See, Whisler Study at pg 1.

¹⁹ See, Whisler Study at pg 11.

examples would be such as Mt Snow and Killington ski areas in Vermont or Mammoth Mountain in California. These ski areas embraced extreme mountain biking to the exclusions of other user groups in an effort to stimulate summer economic activities. These efforts did not yield anticipated results and Killington is now actively seeking out the motorized community for events such as the Jeepers Jamboree, now held annually at Killington.

The Organizations would be concerned that any single minded economic development plan that would be based on mountain biking to the exclusion of other uses would be significantly limited by the high quality opportunities that area already available in other locations in Colorado. Unlike Whisler BC, where there is little competition for mountain bike visitation, the Organizations would also note that there are many other mountain bike specific trail networks in the vicinity of Planning area, such as Moab, Utah, Crested Butte resort, portions of the Colorado River Valley BLM Office and Fruita, Colorado. These exceptional alternatives will impair the ability to draw any mountain bikers in numbers to offset lost revenues from user groups who may leave the Gunnison Planning area.

5. Conclusion.

At the landscape level, the Organizations vigorously support two foundational principals: 1. that development of multiple use trails; and 2. trails should not be developed only to benefit a small user group. These foundational principals cause serious concerns with the specific trail development allocation in the Signal Peak Proposal especially when the Gunnison FO has had such success with multiple use areas such as the Hartman Rocks area. **The Organizations vigorously support the development of multiple use single track trails in the Proposal, more specifically the Sleeping Indian trail.** While we support the multiple use trails there is serious concern with both the basic need and direction that has been adopted for the management of other routes in the Proposal. There simply needs to be a far more balanced allocation of routes being developed. This balance can be achieved by allowing multiple use on routes proposed or by working with local motorized users to determine where additional trails would be appropriate.

The development of what is essentially an advanced mountain bike trail network is very concerning in the Proposal given the tenuous position of funding for all recreational activities on federal lands, the heavy usage of the Gunnison Planning area already, limited benefit from the trail network. The Organizations would note that single track trail is some of the most sought after recreational opportunities and also some of the hardest to find in Colorado due to very limited amounts being available. It is the Organizations position that if trails are developed in the Proposal area, they must be overwhelmingly multiple use, as there is simply insufficient

funding available to allow each user group to have a separate trail system on public lands and such a model does not reflect the multiple use model in place on public lands.

If you have questions please feel free to contact Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com.

Sincerely,



Scott Jones, Esq.
COHVCO &TPA Authorized Representative

D.E. Riggle
Director of Operations
Trails Preservation Alliance

Enclosures