



December 26, 2018

Rick Truex
Acting District Ranger
c/o Brett Crary, Forester
White River National Forest
P.O. Box 190
Minturn, CO, 81645

**Eagle-Holy Cross Ranger District
Muddy Pass/Sheephorn Project Comments**

Dear Ranger Truex:

Please accept these comments 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 ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail multi-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 multi-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 suggestions regarding the enhancement of motorized recreational opportunities in the Eagle-Holy Cross Ranger District (EHCRD) and specific to the Muddy Pass/Sheephorn Project. Page numbers refer to the White River National Forest, Eagle/Holy Cross Ranger District's, Notice of Proposed Action, Muddy Pass/Sheephorn Project.

1. (pg. 3) "Benefits expected from the project include the maintenance and improvement of open forest system roads, the decommissioning of existing non-system roads." ***The Organizations request that instead of road decommissioning that those roads be considered for conversion to a Full Size, Multiple-use Trail or***

another motorized trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). Additional information is provided below.

2. (pg. 8) "The Muddy Pass/Sheephorn analysis area contains approximately 37.30 miles of system roads that would be utilized for hauling activities (Table 2). In addition, there are approximately 27.74 miles of roads within the project analysis area that are identified in the 2012 Travel Management Plan Record of Decision to be closed to the public and or decommissioned. Of these roads, 24.87 miles are proposed for utilization as temporary haul roads, which would be decommissioned following use. The remaining 2.87 miles of road that are not proposed to be utilized as temporary haul roads could be closed while equipment is mobilized in the area." ***The Organizations request that instead of road decommissioning that those roads be considered for conversion to a Full Size, Multiple-use Trail or another motorized trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). Additional information is provided below.***

3. (pg. 13) "The White River National Forest Travel Management Plan (2011) designated a system of roads and trails forest-wide that addressed all modes of travel. The Muddy Pass/Sheephorn Project's Proposed Action includes an amendment to the Travel Management Plan to designate 993.W1 as level II road open to all motorized wheeled use following the Motor Vehicle Use Map season of dates for the surrounding area (Map 6 of 9). Prior to the 2011 TMP, this route was used administratively but not available for public use. Motorized use of 993.W1 is authorized under an existing range permit for the placement of herder camps and weekly motorized vehicle supply trips. Together, range and recreation staff have tried to prohibit public motorized use of this permitted route, however enforcement has proven ineffective and unmanageable due to its popularity. Designating 993.W1 for all motorized use, which includes non-motorized access, provides a desired recreation opportunity that people seek. This route serves as a destination overlook with outstanding scenic views. Physical barriers may be placed around the scenic overlook and along 993.W1 to prevent motorized recreation beyond the overlook. Winter management of the area would remain the same as shown on the winter Over the Snow Map. ***The Organizations support the EHCRD's efforts to open routes previously closed to public access and provide additional opportunities for multiple-use/motorized recreation and the public's access to the to the White River National Forest.***

4. Reference to the existing "Seasonal Closure" of the upper portion of the Muddy Pass Road (AKA Red Sandstone Rd or NFSR #700) that is unavailable for public access until 21 June each year. ***The Organizations request that alternative and other mitigation techniques be implement in order to facilitate opening of this road prior to 21 June each year. Not allowing use of the road until 21 June each year curtails any motorized recreation on this portion of the road until the first day of summer and precludes any early season travel. This closure also precludes motorized travel on USFS dirt/system roads between Hwy 131 and the***

town of Vail until this road is open and accessible.

(https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd514242.pdf)

5. The Organizations would request that the EHCRD consider and embrace a more aggressive strategy of converting select National Forest System Roads (NFSR) and non-system roads to multiple-use/motorized trails. This strategy is a practical and a beneficial way of simultaneously meeting the requirements of designating a Minimum Road System (MRS), and at the same time providing a safer, more economical, more environmentally sound and more flexible motorized route/trail system for public recreational uses. ***The Organizations encourage and would support the EHCRD's decision to convert most any existing National Forest Service Road (NFSR) or sustainable non-system road to a Full Size Multiple-use Trail or another trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). The Organizations encourage the use of conversion techniques described in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.***
6. Conversion of roads to trails in accordance with the methods and techniques described in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication would allow the EHCRD staff to be much more flexible, creative and innovative in meeting the increasing desires, needs and demands of the public to provide high quality motorized recreational experiences. The spectrum of possibilities to make "trails" more desirable, interesting, challenging and fun is much broader with trails than with the stringent engineering requirements for "roads". The Organizations would also offer that meeting the mandatory NEPA requirements can be, and is often more straight forward and expedient when considering the modifications or improvements to trails than for roads.
7. Financial Sustainability - Conversion of roads to multiple-use/motorized trails will 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 multi-use trails that allow for motorized use and other activities*). These conversions will thereby help reduce the direct financial burden and back log to the EHCRD and can supplement funding with user provided funds that were previously unavailable for these routes. Conversion from roads to trails will also likely reduce the required maintenance level and reduce the necessary amount and back log of funding. By providing an adequate and varied inventory of routes and trails that fulfill 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 future expenditures on maintenance, signage, enforcement, etc. Finally, the lack of fiscal capacity by the USFS/EHCRD 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 EHCRD.

8. The Organizations are aware that there may also be concern that conversion of roads to trails for motorized use in Colorado may cause apprehension that travel on converted routes would now invoke the requirement for a State of Colorado Parks and Wildlife (CPW) OHV sticker for legal travel. The Organizations are very aware of, and in some cases are participating in statewide discussions to explore funding mechanisms and user fees to help supplement public land management agency operating budgets for activities beyond OHV use. The Organizations contend that expanded implementation of user fees for public lands will become inevitable in the future. That utilizing the highly successful CPW OHV sticker program for travel on motorized trails that have been converted from roads is reasonable and in agreement with the ongoing discussions to implement and expand user fees to activities other than OHV use, hunting, fishing, etc.

Thank you for your consideration of these comments. Together we hope to help develop an enhanced, sustainable system of motorized routes on the EHCRD, and at the same time provide for safe and efficient travel together with the administration, utilization and protection of EHCRD lands.

Sincerely,



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