



March 6, 2019

Senator Corey Gardner
Att: Dustin Sherer
354 Russell Office Building
Washington, DC 20510

Re: Summary of CORE Wilderness opposition

Dear Senator Gardner;

Please accept this correspondence a summary of our more detailed comments in opposition to the CORE Wilderness Proposal previously submitted. Our Organizations are opposed to any assertion the CORE proposal is a benefit to recreational usage of the lands addressed. Rather than being a benefit for recreational usage of these areas, our Organizations submit the CORE Wilderness proposal would be the largest barrier to recreation on federal public lands in the history of Colorado. CORE closes the bulk of areas to almost all recreational usages; closes extensive trail networks where travel management analysis was just completed; and fails to protect current highly used recreational resources in areas not closed. Rather than protecting these highly valued opportunities, CORE sets the foundation for the eventual loss of these opportunities.

We have tried to raise these concerns in discussions around specific portions of CORE previously and those concerns have gone without response, and rather than collaboration with broad communities of interests, CORE advances a very small portion of the total recreational interests in these areas. This is simply unacceptable to us.

Curecanti NRA

1. The Curecanti NRA is already a nationally recognized NRA by the Park Service and Congress has recognized the NRA for multiple use recreational values in 1999, and has successfully been managed without conflict for its unique and diverse recreational values by the Park Service for decades. In response to the Congressional action, in 2011 the NPS identified the 5 major recreational usages of the Curecanti area but only 2 of the top 5 recreational usages of the

Curecanti Area are proposed to be recognized as characteristics of the CORE NRA moving forward. While 3 of the 5 top recreational uses Curecanti are not protected in CORE, the final characteristic protected in the CORE is hunting. We must question why an activity that accounts for less than 5% of all visitation to the area is identified as characteristic of the area while developed camping, which accounts for 30% of visitation based on almost 400 developed campsites on the NRA is not identified as a characteristic of the NRA.

2. The Curecanti has an extensive multiple use trail network providing access to the Curecanti NRA and extensive sections of BLM and USFS lands adjacent to the Curecanti. This network was just reviewed in its entirety by the NPS travel management completed in late 2000's and found to be valuable and sustainable for a wide range of uses. This multiple use trail network is a resource that while not specifically identified for inventory purposes by the Park Service, which plays a critical role many of the top recreational activities on the NRA, such as OHV riding, motorcycle riding, hiking and horseback riding. The Organizations submit that multiple use trails and camping must be recognized by CORE as characteristics of the Curecanti area as these are important components of the quality and conflict free recreational activities that have gone on for decades in the Curecanti area.

Continental Divide

1. The CORE Wilderness expands Wilderness in locations where previous Congressional Wilderness legislation has mandated certain routes be reopened. Despite the clear intent of Congress, these mandates have simply never been complied with such as the Rollins Pass Road. Rollins Pass Road is almost directly adjacent to newly expanded CORE Wilderness areas. Not only is this wrong, the levels of conflict that would result would be immeasurable. Many of the parties that supported reopening the Rollins Pass in federal law have opposed the reopening of Rollins Pass Road in USFS discussions since and are now seeking more Wilderness. All facets of previous Congressional mandates must be completed before further Wilderness expansions are explored.

2. CORE Wilderness provisions close extensive legal trail networks in the Spraddle Creek and Williams Fork areas of the Continental Divide areas. These are trail networks that were found to be sustainable and valuable after completion of travel management by the USFS in 2013 and are heavily used by a wide range of trail users.

3. The Continental Divide portions would close large areas the Forest Service recently identified as future expansion areas for multiple use recreation in their planning process. The end result of

these closures is that future multiple use expansion areas would be cut in half and expansion in many areas would almost be impossible.

3. The no-name wilderness addition boundary would be placed within 50ft of the Holy Cross City route, which is consistently identified as one of the top trail destinations in Colorado for the 4x4 community. Our concerns on this issue are similar to the Wilderness boundary issues with trails identified in the San Juan portion below.

4. Any SMA alleged to be benefitting recreation designated in CORE Wilderness are in areas where topography is so difficult that trail construction is difficult to almost impossible and motorized usage is commonly excluded from these areas resulting in benefits only for a small portion of the entire recreational community.

San Juan

1. The Sheep Mtn SMA closes legal multiple use recreational opportunity areas for the benefit of a small special interest in the area, such as Sheep Mtn outside Telluride. Any riding areas in the Telluride area are exceptionally valuable given the large amount of Wilderness in the area which has already been designated and difficult topography in the area. The provisions of the SMA would mandate exclusion of public access for snowmobiles and related activities in favor of Congressional protection of heli-skiing permittees. This is merely legislating who gets first tracks in fresh snow in the area.

2. Many expanded Wilderness areas in San Juan were specifically released for non-wilderness multiple use by Congress in 1980 as part of efforts to bring balance to the 1980 Colorado Wilderness Act.

3. CORE Wilderness boundaries change existing boundaries Congress placed on ridge tops or similar features because of trails in the vicinity in 1980 to within 50ft of existing legal trails. This conflicts with all USFS published guidance. By comparison the USFS recommends a ½ mile buffer around National Trail System routes.

4. USFS trail maps are simply not that accurate and the proximity of new Wilderness boundaries would make long term maintenance on these routes very difficult if not impossible after floods and we routinely cut thousands of trees off trails in Colorado. Most hazard trees are outside the 50 ft buffer proposed for the trail. Our ask for these routes would be a Congressional designation of a corridor of 300ft on each side of trails that recognizes the multiple use value of these routes

as many of these have been nationally recognized as important routes by recreational users and existed without controversy for decades. Again these requests have gone without response.

Thompson Divide

The Thompson Divide portions of the CORE act are utterly unrelated to recreational activity, so we find it difficult to create any value for multiple use recreation in the area. Rather the Thompson Divide portions of the CORE place more concern, albeit minimal, on multiple use recreation as one of the goals of the area is to reduce greenhouse gases. The boundaries of the area include Kebler Pass and Beckwith Pass which encompass some of the best snowmobile opportunities in the country in the winter and exceptional multiple use summer opportunities. A Congressionally declared goal for the area of reducing greenhouse gasses would not be a benefit to recreation as it is not difficult to see a situation motorized usages conflict with the goals of the area as they emit greenhouse gases.

Please feel free to contact Scott Jones, Esq. if you should wish to discuss any of the issues that have been raised in these comments further. His contact information is Scott Jones, Esq., 508 Ashford Drive, Longmont Colorado 80504; phone 518-281-5810; email Scott.jones46@yahoo.com

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Scott Jones', with a long horizontal flourish extending to the right.

Scott Jones, Esq.
COHVCO/TPA Authorized Rep.
CSA President