



April 23, 2019

Delivered via email to awelsh@blm.gov

Andy Welsh
Outdoor Recreation Planner/Realty Specialist
Silverton Field Station
Gunnison Field Office

SUBJECT: Review of the Alpine Triangle Final Recreational Area Management Plan and associated Environmental Assessment

Dear Andy:

Please accept these comments on behalf of the Trails Preservation Alliance (TPA), the San Juan Trail Riders (SJTR) the Public Access Preservation Association (PAPA) and the Colorado 500 (CO 500). The **TPA** is a Colorado nonprofit corporation. The TPA is a volunteer organization created to be a viable partner to public lands managers, working with both the United States Forest Service (USFS) and the 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 multiple-use recreational opportunities. **SJTR** is a Colorado nonprofit corporation with approximately 400 members. SJTR is based in Durango and its members are primarily from Colorado. **PAPA** is a Colorado nonprofit corporation with approximately 300 participants. PAPA is based in Telluride and its members are primarily from Colorado. The **Colorado 500** is a charity organization consisting of and funded by motorcyclists dedicated to helping rural Colorado schools, youth organizations and humanitarian agencies.

In order to help understand our comments and concerns we would like to provide the following historical context. Our four organizations have all participated in, and enjoyed multiple-use, motorized recreation in the Silverton and specifically the Alpine Triangle Recreation Area for decades, with the primary purpose of riding off-road motorcycles on single-track trails and other primitive routes, both trails and roads. Over the past decades, the single-track trails that were enjoyed and used by motorcyclists have now been closed to motorcycle use. A few historic examples of single-track trails our organizations have enjoyed and utilized in the past include:

- Minnie Gulch Trail
- Maggie Gulch Trail
- Highland Mary Mine Trail
- Rocky Gulch Trail
- Continental Divide Trail
- Cataract Lake trail

Former motorcycle single-track trail connections from the Alpine Triangle area to the Rio Grande National Forest have included:

- Middle Fork Trail
- West Fork Trail
- Pole Creek Trail
- Deep Creek Trail
- Bear Creek Trail

As of today, all motorcycle use is limited to and restricted to routes designated as “roads”. Just like mountain bicyclists enjoy their single-track trails and experiences, so do many motorcyclists, and we feel it is appropriate at this time to begin planning for the opening and or re-opening of select trails to motorized single-track use.

The staff of our four organizations has been actively reviewing the Final Environmental Assessment for the Alpine Triangle Recreation Management Plan, originally prepared in August 2010 and the separate document titled Alpine Triangle Final Recreation Area Management Plan (aka RAMP). Our review of these two documents is being done to prepare ourselves for the BLM’s upcoming proposed action for the Silverton’s Travel Management Plan.

We would like to offer the following comments and concerns regarding these two documents and feel it is important to highlight our interests at this time:

1. First and foremost is our concern that past decisions and the associated trail closures have essentially eliminated ALL motorized single-track recreational opportunities in the Alpine Triangle Recreation Area. That all motorcycle use is now grouped and combined with the many other diverse forms of Off-Highway Vehicle (OHV) recreation uses, vehicle types and assembled into a single category. Our organizations feel it is regrettable that the RAMP documents did not acknowledge or recognize the recreational use of motorcycles on single-

track “trails”. The fact that motorcycle use has been grouped with all other “Authorized Uses” exclusively on Route Types labeled as “Roads”, would seem to disregard the preference that some motorcyclists enjoy and seek the experience to ride on and use single-track trails just like “Mountain Bikes”, “Foot” and “Horses” users do. The documents also do not appear to acknowledge the desire, and what our organizations believe is a “repressed” need, for multiple-use, motorized single-track infrastructure. A recreational opportunity that had existed in the area in the past and was enjoyed by the public for decades is now no longer available¹.

2. Similar to our concern stated above, the documents also do not appear to identify, acknowledge, inventory or recognize the use of OHVs (e.g., ATVs and UTVs) on “trails” *that are defined as 50 inches or less in width or routes that might be over 50 inches wide that are identified and managed as “trails”*².
3. It seems to our organizations that the RAMP documents have focused the preponderance of analysis and inclusion of multiple-use, motorized recreation exclusively to the Alpine Loop area and recreational users of the “roads” that comprise the Alpine Loop and its associated road network. There does not appear to be any discussion or recognition of the desire for multiple-use, motorized recreation in areas and on routes (e.g., “trails”, single-track trails, and trails less than 50” wide) other than the Alpine Loop “road” network.

Our organizations feel it will be vitally important that these specific and unique uses, namely off-road motorcycle riding on single-track trails, be recognized and acknowledged as a legitimate, historical and appropriate use of the Alpine Triangle Recreation Area to meet the needs, desires and expectations for motorcycles. We also feel it will be important to specifically recognize motorcycle single-track use in the Alpine Triangle Area to facilitate the improvement and expansion of recreational opportunities in the future.

Thank you for your consideration of our comments and concerns. Together in partnership with the Gunnison Field Office we hope to help develop future land use and recreation plans that are responsive to user needs, provides sustainable multiple-use, motorized recreational opportunities and protects the resources of the GFO. The organizations would welcome a discussion of our comments and concerns with the undersigned at info@coloradotpa.org or 719-338-4106.

Sincerely,

D. E. Riggle

Director of Operations
Trails Preservation Alliance
cc Elijah Waters
Field Manager
BLM Gunnison Field Office

¹ Final Environmental Assessment, Alpine Triangle Recreation Area Management Plan, Table 3.12, Summary Table of Existing Designated Travel Routes, pg. 96.

² Final Environmental Assessment, Alpine Triangle Recreation Area Management Plan, pg. 94.