



May 14, 2019

Kremmling BLM FO
Att: North Sand Hills RAMP
PO Box 68
Kremmling, CO 80459

RE: North Sand Hills RAMP

Dear John;

Please accept this correspondence as the vigorous support of the Organizations above for efforts to improve and expand recreational facilities and opportunities at the North Sand Hills area on the Kremmling FO. As you are aware, the Organizations have been seeking the release of the WSA/ISA designation on the North Sand Hills for the last several years. While those efforts have not been successful to date, we are hopeful this issue will be resolved in the next several years as this designation provides a significant barrier to long term development and improvement of the area.

Prior to addressing the specifics of the North Sand Hills area, a brief summary of the Organizations will add context to our comments. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 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 ensure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. COHVCO and TPA are referred to collectively in this correspondence as "The Organizations".

First, we need to reaffirm that the North Sand Hills area provides a unique and highly desirable recreational opportunity for the Colorado region as this area is one of the few sand dune areas that is open to motorized usage making it highly valued by a large portion of the motorized community who seek out sand dune riding opportunities. The area is made truly unique by the fact that riders can enjoy a sand dune-based riding experience than then transition to a more traditional rocky mountain trail-based riding experience by accessing trails on State Forest State Park and other adjacent lands.

Our general thoughts for the area moving forward would include:

1. Improved infrastructure such as designated campsites, with fire rings, the inclusion of shower and toilet facilities would be a significant step forward. We believe these types of opportunities would reduce the long-term negative impacts of the high levels of dispersed camping that the area sees, such as multiple fire rings for a single site and years of fire pit debris being found in the camping areas. These types of issues simply degrade the recreational experience for the area.

If designated camp sites are adopted, we would encourage you to designate a limited number of larger sites for groups of trailers or users where groups of users could reserve the site and then pull multiple units into the area for the reserved time period. Normally these sites have been able to accommodate 5 or 6 camper units, and we would be concerned if larger opportunities were provided as there is simply a geographic limitation on the number of these sized sites that could be provided. We know these larger sites are highly valuable in other dune-based areas so larger single groups can be focused around a central area or location.

We are aware that these types of services would probably require the payment of a small additional fee beyond existing requirements of OHV registrations for the use of the area, we do not expect this fee to be an issue with the expanded opportunities that would result from the fee. It would be important to maintain the relationship between payment of the fee and the improved facility experience now available. If that relationship was lost, we would expect opposition to any fee to grow.

With the establishment of improved campsites, a reservation type system would become necessary and we are not opposed to that type of development. Our one concern would be education of users regarding this change and it has been our experience that even the best educational projects don't reach everyone. Our recommendation would be to start educating users about the reservation system at least a year in advance and to slowly transition the area

to a full reservation system such as providing 25% of the area to be reservation the first year, 50% the second and so forth. That way users could still have access to existing dispersed camping and the opportunity to obtain any open developed sites and still be able to use the area as awareness for the designation system expands.

2. Expanded planned access between camping and recreational areas would be a major step forward as well. With the current opportunities it is somewhat easy to mistakenly enter a campsite of another user while attempting to return to your campsite. This is simply not a good experience for either group and should be avoided and an improved designated travel system in the camping area would allow this. The USFS has undertaken such a project in the Badger Flats area on the South Park Ranger District of the Pike San Isabel NF with success, as the Badger Flats area was facing many of the same challenges that are being seeing with camping on the North Sand Hills area. While that documentation is not included, we would be more than willing to share that information at the appropriate time.

3. Designated training areas for youth are always desirable, especially when there is a shade structure for parents to use while the youth are riding. Additionally, a trials area or more advanced skills are would also be desirable as there is a growing trials riding community in Colorado and these opportunities are difficult to obtain. We are aware that the BLM UFO has started created a staging/skills area in Peach Valley area outside Montrose Colorado and similar facilities have been well received in other areas. While dune riding is not exceptionally technical, the trails outside the North Sand Hills can be and having an area where riders can train or hone skills before encountering obstacles on the trail improves the entire recreational experience for all involved.

4. Mendenhall Road and Government creek are both important opportunities in the area and the Organizations would vigorously support reopening and improving these areas. The historic cabin provides a unique opportunity and with a small amount of information about the historic nature of the cabin, the Organizations believe the impacts previously experienced would be avoided in the future as the public could understand the value of the cabin. We are not sure that information was available to them previously. Improvements to the Government Creek area are important as well due to the connectivity to other opportunities this connection provides.

The Organizations thank you for your Office's efforts in working toward improve recreational opportunities in the North Sand Hills area by creating management planning that could be supported by all recreational users and protect natural resources in the area to move forward

to the benefit of all users and expand economic benefits to the local communities. Please feel free to contact Scott Jones at 518-281-5810 or by mail at 508 Ashford Drive, Longmont, Co 80504 for copies of any documentation that is relied on in these comments or if you should wish to discuss any of the concerns raised in these comments further.

Sincerely,

A handwritten signature in cursive script that reads "Don Riggle".

Scott Jones, Esq.
TPA/COHVCO Authorized Rep.

D.E. Riggle
Director of Operations
Trails Preservation Alliance