



September 19, 2019

Royal Gorge Field Office  
Att: RMP Revision Team  
3028 East Main  
Canon City CO 81212

RE: Draft RMP comments

Dear Mr. Berger:

Please accept this correspondence as the comments of the above Organizations with regard to the draft Resource Management Plan for the Royal Gorge Field Office ("the Proposal"). The preferred Alternative ("D") is acceptable to the Organizations with minor modifications to the Proposal, as Alternative D does not prohibit expansion of most areas of the Field Office for a wide range of uses including motorized recreation. While Alternative D does not prohibit OHV usage on large portions of the RGFO, this Alternative really only carries forward existing OHV areas and does not provide for expanded acres for multiple use recreation. The Organizations believe this will be problematic in the long term, as the current recreational opportunity areas on the RGFO are easily overwhelmed and the State population continues to grow very quickly. As a result, identification of planned expansion areas will become critically important over the expected life of the RMP in order to expand opportunity for recreational usage in a thoughtful manner. The imbalance of the current alternatives with regard to recreational usage is evidenced by the fact there are 8 units designated for hunting and fishing expansion but only four for multiple use.

Prior to addressing the specific thoughts on the Proposal, our Organizations have regarding the draft Royal Gorge FO RMP, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization seeking to represent, assist, educate, and empower all of the more than 200,000 OHV recreationists in Colorado 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.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite the more than 30,000 winter motorized recreationists across the state to enjoy their passion. CSA has also become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling through work with Federal and state land management agencies and local, state and federal legislators telling the truth about our sport. Collectively, CSA, COHVCO and TPA will be referred to as "the Organizations" for the purposes of this document. These comments are also submitted in addition to the comments from our local clubs, which we vigorously support.

While we are able to support Alternative D with minor revisions, the Organizations are vigorously opposed to Alternative B due to the exceptionally large amount of Wilderness Characteristics areas that are provided for. Many of these areas simply are not suited for Management as a Wilderness Characteristics are due to high levels of human activity that are visible. This type of usage is simply inconsistent with requirements of Wilderness being untrammeled by man. Additionally, many of these areas would automatically prohibit motorized usage despite Congressional requirements existing uses must significantly impair ability to designate an area as Wilderness in the future which trails do not.

The Organizations submit that the RGFO Proposal must also be brought into consistency with the 2013 LCAS. The Organizations would also support the alteration of the preferred

Alternative to allow for the inclusion of Backcountry Area designations, as they are proposed in Alternative B of the Proposal. We support new designations that allow for the use and protection of resources for the public and we believe the BCA concept is such a management standard in its current form.

**1. The draft RMP states its goal is to expand recreational access but fails to do so as there are no new motorized expansion areas identified.**

The Organizations welcome the identification of goals including expansion of access to the planning area and expanded recreational usage of the planning area as initial goals of the Proposal. Too often concerns like these are not a priority in planning and this change is refreshing. The Organizations vigorously support the planning priorities identified on the RGFO, which the Proposal states as follows:

“Specifically, the purpose of the action includes:

- Improving public access and resource management through a consolidated land base. The FLPMA requires, in part, that the “public lands be managed in a manner that will...provide for outdoor recreation and human occupancy and use” (43 U.S.C. 1701 [Sec. 102.a.8]). The FLPMA also requires the “acquisition of non-federal land for public purposes and the exchange of such lands...be consistent with the prescribed mission of the...agency involved” (43 U.S.C. 1701 [Sec.102.a.10]).

- Improving and restoring ecological sustainability/resiliency. The FLPMA also requires, in part, that the “public lands be managed in a manner that will protect the quality of... ecological, environmental, air and atmospheric, water resource values...;that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals...” (43 U.S.C. 1701 [Sec. 102.a.8]).

- Providing recreation opportunities. The FLPMA requires that, among other uses, “the public lands be managed in a manner that will...provide for outdoor recreation and human occupancy and use” (43 U.S.C. 1701 [Sec. 102.a.8]).
- Providing economic opportunities. The FLPMA requires that, among other uses, “the public lands be managed in a manner which recognizes the Nation’s need for domestic sources of minerals, food, timber and fiber from the public lands” (43 U.S.C. 1701 [Sec. 102.a.12]).”<sup>1</sup>

The Organizations welcome the identification of these three factors in the Proposal. These factors are often associated with the responsible utilization of public lands in any planning area and the recognition of these needs is a major step towards developing a high-quality planning tool that will be relevant to the FO planning area for an extended period of time.

While the Proposal makes significant important recognitions in the purpose and need statements, the Organizations are concerned that these goals and objectives are not fully carried into the development of SRMA designations in the Proposal. SRMA designations have been critical in other field office planning efforts to identify areas for future development and also to allow agency and extensive partner resources to be targeted to these areas in a manner that is most effective.

## **2. Economics of recreation**

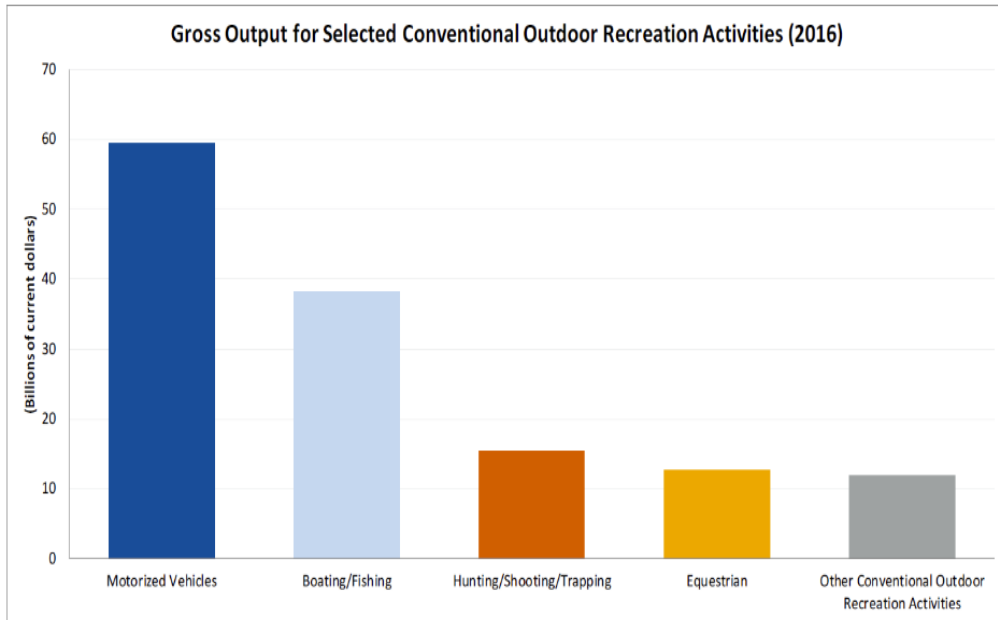
New research highlighting the economic importance of multiple use recreation to the recreational spending benefits flowing to local communities comes from research from the Department of Commerce. This analysis was prepared at the request of Department of Interior Secretary Sally Jewel in 2012, addressing the importance of recreational spending in the Gross Domestic Product as recreational spending accounts for more than 2% of the GDP.<sup>2</sup> This

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<sup>1</sup> See, DOI, BLM Royal Gorge FO Draft RMP; June 2019 at pg. 1-1.

<sup>2</sup> See, Department of Commerce; Bureau of Economic Analysis; “*Outdoor Recreation Satellite Account: Prototype Statistics for 2012-2016*”; February 14, 2018 at pg. 2.

research clearly identified the important role that motorized access plays in recreational spending, which is summarized in the following chart:



This research concludes that motorized recreation almost outspends all other categories of recreation combined, and this relationship simply cannot be overlooked in the land management planning process. Given that motorized usage plays major roles in both the hunting and fishing economic analysis, the three largest components of economic benefit from recreational activity would be prohibited when multiple use recreational access is lost in any area. As a result of the overwhelming nature of these conclusions, the Organizations have to express serious concerns when the lion's share of economic drivers are excluded from using any portion of public lands as clearly economic benefits are limited. The negative economic impact concerns regarding degrading multiple use access are immediately apparent and are a major reason for our opposition to Alternative B of the Proposal.

The risk of negative economic impacts from recreational restrictions is also highlighted in newly released research from the US Forest Service, which estimates that recreation on National

Forest Service Lands accounts for more than \$13.6 billion in spending annually.<sup>3</sup> Experts estimate that recreational spending related to Wilderness areas accounts for only 5% of that total spending or approximately \$700,000 million nationally.<sup>4</sup> The limited economic driver of Wilderness based recreation is compounded by the fact that more than 20% of the trail network that is currently located on USFS lands is within Wilderness areas. Again, this type of underutilization of any recreational resource is concerning to the Organizations simply because of the allocation of the resources and funding and weighs heavily against expansion of any recommended Wilderness or other exclusionary designations in the planning process.

The basis for the disparate economic benefits from recreational resources is easily identifiable when USFS comparisons for economic activity of recreational users is compared in the research below:

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**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 <sup>a</sup>			Local Day Trips			Local Overnight Trips <sup>a</sup>		
	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
<b>Total</b>	<b>\$58</b>	<b>\$65</b>	<b>\$90</b>	<b>\$214</b>	<b>\$366</b>	<b>\$648</b>	<b>\$34</b>	<b>\$34</b>	<b>\$29</b>	<b>\$165</b>	<b>\$177</b>	<b>\$224</b>
Ratio to average	<b>0.90</b>		<b>1.39</b>	<b>0.59</b>		<b>1.77</b>	<b>0.98</b>		<b>0.84</b>	<b>0.93</b>		<b>1.27</b>

Shaded cells were filled using rules 1, 2, 3, or 4 as described in the text. Other figures are estimated directly from the NVUM sample.

<sup>a</sup> Includes visitors on overnight trips staying on or off the forest.

<sup>3</sup> See, USDA Forest Service; National Forest Support a Recreation Economy- a complete study copy is available here: <http://blog.nwf.org/2014/07/national-forests-support-recreation-economy/>

<sup>4</sup> See, Holmes & White; *National & Community Market Contributions of Wilderness; Society & Natural Resources*; An International Journal; Volume 30 2017

<sup>5</sup> See, UDSA Forest Service; White & Stynes; *Updated Spending Profiles for National Forest Recreation Visitors by Activity*; Joint venture between USDA Forest Service Pacific Northwest Research Station and Oregon State University; November 2011 at pg. 6.

This research are consistent with conclusions that high spending user groups, such as snowmobile and OHV users are consistently excluded, while low spending groups such as cross-country skiers and hiker are permitted in many restricted or limited access management areas. Given the fact that low spending profile users are often spending only 20% of higher spending profile groups, these conclusions are consistent with the conclusions of both the Department of Commerce and new USFS research.

While the imbalance in spending profiles is problematic, the fact that once Wilderness is designated the general public fails to use the limited recreational opportunities in these areas is even more concerning. Nationally, congressionally designated Wilderness accounts for approximately 19% of USFS lands but results in only 3.4% of all visitor days.<sup>6</sup> In the State of Colorado, there is approximately 22% of USFS lands managed as Wilderness<sup>7</sup> but despite the expanded opportunity results in only 3.7% of visitor days on the GMUG National Forest.<sup>8</sup> Given the significant underutilization of Wilderness resources in the area of the Proposal, the Organizations must vigorously assert that any economic risk is significantly negative and must be addressed or at least recognized by the communities in the vicinity of the Proposal areas.

BLM analysis for the State of Colorado also highlights the exceptional value of recreational activity on public lands, which is especially important in the RGFO due to the limited availability of cola resources on the RGFO planning area. The BLM analysis provides the following analysis of economic drivers on public lands:<sup>9</sup>

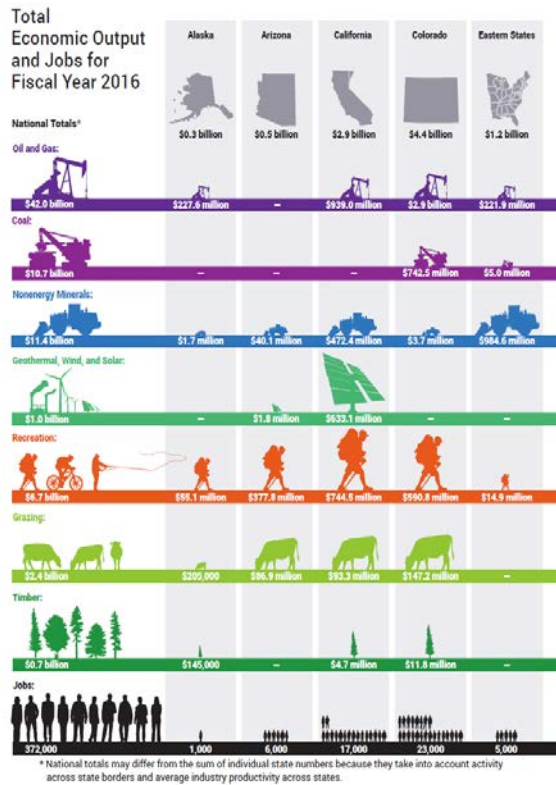
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<sup>6</sup> See, USDA Forest Service, National Visitor Use Monitoring; *“National Visitor Use Monitoring Survey Results; National Summary Report; Data collected FY 2012 through FY 2016”*; 2016 at pg. 1.

<sup>7</sup> See, USDA Forest Service; 36 CFR Part 294 Special Areas; *Roadless Area Conservation; Applicability to the National Forests in Colorado*; Final Environmental Impact Statement; May 2012 pg. 19

<sup>8</sup> See, USDA Forest Service; *National Visitor Use Monitoring Results; GMUG National Forest; Round 3*; last updated January 26, 2018 at pg. 9.

<sup>9</sup> See, DOI; *The BLM: A sound investment for America 2017*; at pg. 4.



While the BLM smart choice document does not provide a large amount of comparative or localized information about the economic importance of recreation, the compelling nature of these conclusions simply cannot be overlooked.

The Organizations are also aware that the above information is of limited value for the RGFO planning efforts simply due to the conflicting scales of the reporting. As a result, we are providing a copy of the 2014 COHVCO economic contribution study that was prepared in conjunction with the BLM Colorado State office, USFS and CPW. A copy of the complete COHVCO study is included with these comments for your reference as exhibit "A". This independent report concludes that motorized recreation provided \$2.2 billion dollars to the Colorado economy and accounted for more than 15,000 jobs in 2014. More specifically to the RGFO planning area, the COHVCO study found that the South Central and Central regions of Colorado had economic contributions of more than \$550,000,000 in sales and tax revenues to



local and state economies and directly resulted in more than 6,000 jobs in the region. These are significant economic contributions to these areas and are sufficient to warrant identification of expansion areas for future OHV development areas.

### **3. RGFO lynx management appears to conflict with best available science on numerous basic issues.**

The Organizations were surprised and disappointed at the lynx management standards in the Proposal. Rather than being an accurate reflection of best available science that has been clearly provided through collaborative efforts between the USFS, USFWS, BLM and NPS, the RGFO standards have to be one of the more restrictive summaries of numerous documents that have been superseded as a matter of law. This is an unusual starting point for the development of an RMP that may be governing the forest for more than the next 30 years and clearly will draw these planning provisions into immediate conflict with best available science. Adopting standards that are already superseded in this situation simply makes no sense and many of the basic management standards for the lynx are foundational in nature, such as managing for two levels of habitat per best available science while the RGFO proposes to manage all habitat as the same issue, and must be corrected.

The disappointment of the Organizations is driven not only by this situation but also the fact the Organizations were active participants with the several other groups in what became known as the Colorado lynx blueprint project, which resulted in the 2013 LCAS. In addition to years of meetings and significant resources from numerous partners, the Organizations attempted to donate a snowmobile to researchers and supported researchers over years of efforts including recovering stuck equipment in the backcountry with snowmobile grooming equipment, providing parts, oil and fuel for efforts on an as needed basis and printing and circulating a copy of the LCAS to every Ranger District and Field Office in the state. As a result of these efforts, the Organizations have some significant vested interests in the success of the management of the species. These are also the types of partnerships the USFS is seeking to develop long term and failing to implement standards developed by these partnerships and approved by the USFS simply sends the wrong message on the value of partnerships.

Prior to addressing our specific concerns on management standards for the species, the Organizations would like to dispel any thoughts that previous management documents might still be applicable on forest service lands. The 2013 LCAS clearly states the document is the standard to be applied for federal lands management efforts moving forward including the \$7 Consultation process, stating as follows:

“The Lynx Conservation Assessment and Strategy (LCAS) was developed to provide a consistent and effective approach to conserve Canada lynx (*Lynx canadensis*), hereafter referred to as lynx, and to assist with Section 7 consultation under the Endangered Species Act (ESA) on federal lands in the contiguous United States....

The Steering Committee selected a Science Team, led by Dr. Leonard Ruggiero, FS-Rocky Mountain Research Station, to assemble the best available scientific information on lynx, and appointed a Lynx Biology Team, led by Bill Ruediger, FS-Northern Region, to prepare a lynx conservation strategy applicable to federal land management in the contiguous United States.”<sup>10</sup>

The 2013 LCAS clearly states its applicability to all planning in the future as follows:

“This edition of the LCAS provides a full revision, incorporating all prior amendments and clarifications, substantial new scientific information that has emerged since 2000 including related parts of the Lynx Recovery Plan Outline, as well as drawing on experience gained in implementing the 2000 LCAS. The document has been reorganized and condensed to improve readability and reduce redundancy.”<sup>11</sup>

The 2013 LCAS further states the reasoning for moving from standards and guidelines for management of the Lynx in conservation measures is as follows:

“Guidance provided in the revised LCAS is no longer written in the framework of objectives, standards, and guide-lines as used in land management planning, but rather as conservation measures. This change was made to more clearly distinguish between the management direction that has been established

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<sup>10</sup> See, Interagency Lynx Biology Team. 2013. *Canada lynx conservation assessment and strategy. 3rd edition.* USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp. at pg. 1. (hereinafter referred to as the 2013 LCAS”). We have included a complete copy of this document for your reference with these comments.

<sup>11</sup> See, 2013 LCAS at pg. 1.

through the public planning and decision-making process, versus conservation measures that are meant to synthesize and interpret evolving scientific information.”

The 2013 LCAS clearly states it has superseded the 2008 Southern Rockies lynx amendment and the USFS, USFWS, BLM, CPW and NPS experts recognize the current format, without goals and objectives is the most effective manner to manage the lynx.

The failure of the RGFO lynx management to even arguably comply with best available science is evidenced by the failure to recognize that not all habitat is created equal, and such recognition has become critical to species management of all kinds. While a detailed discussion of all the efforts to identifying habitat based in quality is too long for these comments, the Organizations believe a brief review is warranted. USFWS regulations now require significantly more information around habitat value in the listing of a species and designation of critical habitat. Recent planning around the Greater Sage Grouse went so far as to create three categories of habitat mainly: Priority, occupied and modeled but unoccupied habitats for the Grouse. In addition to these new categories, USFWS, BLM and USFS provided hundreds of pages of guidance documents to allow managers to plan accordingly.<sup>12</sup>

The entire RGFO objective for lynx management under a single standard conflict with the 2013 LCAS, which clearly requires two separate management standards, one for core habitat areas and one for areas of lesser usage by the lynx. The overall intent of the 2013 LCAS is clearly identified as follows:

“...conservation efforts for lynx are not to be applied equally across the range of the species, but instead more focus is given to high priority areas: the core areas. Further, we combined secondary areas and peripheral areas (which were also identified in the recovery outline) into one category, because they have similar characteristics and management recommendations. The intent is to place more

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<sup>12</sup> See, <https://www.fs.fed.us/sites/default/files/sage-grouse-habitat-assessment-framework.pdf>

emphasis on protection of the core areas, which support persistent lynx populations and have evidence of recent reproduction, and less stringent protection and greater flexibility in secondary/peripheral areas, which only support lynx intermittently.”<sup>13</sup>

The concept of LAU being of different quality or value is simply never even mentioned in the Proposal despite this being one of the cornerstone changes in the 2013 LCAS. The failure of the Proposal to utilize basic management tools for planning, such as priority habitat, modeled but unoccupied habitat and other classifications of habitat is deeply troubling and symptomatic of the complete failure of the proposal to be based on science as these tools are now commonplace species management tools as exemplified by listings and reviews of the Greater Sage Grouse, Gunnison Sage Grouse, numerous species of trout. This is habitat management 101 for all species and must be reflected in the Proposal. The failure to utilize basic tools such as this is problematic.

In the Lynx blueprint efforts, this theory was repeatedly identified as one of the major failures of the entire lynx management process and is now diverting partner and management resources away from primary threats to the species. This badly outdated summary simply needs to be removed and updated with best available science on lynx management. No mention of the fact that the SRLA has been clearly superseded as a management tool is ever made.

The Organizations wanted to highlight some of the more significant changes in lynx management standards in the 2013 LCAS including:

- Recreational usage of lynx habitat is a second level threat and not likely to have substantial effects on the lynx or its habitat. Previous theory and management analysis had placed a much higher level of concern on recreational usage of lynx habitat; <sup>14</sup>

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<sup>13</sup> See, 2013 LCAS at pg. 2.

<sup>14</sup> See, 2013 LCAS at pg. 94.

- Lynx have been known to incorporate smaller ski resorts within their home ranges, but may not utilize the large resorts. Dispersed motorized recreational usage certainly does not create impacts that can be equated to even a small ski area;<sup>15</sup>
- Road and trail density do not impact the quality of an area as lynx habitat;<sup>16</sup>
- There is no information to suggest that trails have a negative impact on lynx;<sup>17</sup>
- Snow compaction from winter recreational activity is not likely to change the competitive advantage of the lynx and other predators;<sup>18</sup>
- Snow compaction in the Southern Rocky Mountain region is frequently a result of natural process and not recreational usage;<sup>19</sup>
- Winter recreational usage of lynx habitat should only be "considered" in planning and should not be precluded given the minimal threat this usage poses to the lynx; and<sup>20</sup>
- Failing to manage habitat areas to mitigate impacts of poor forest health issues, such as the spruce and mtn pine beetle, is a major concern in lynx habitat for a long duration.<sup>21</sup>

The Organizations vigorously assert that the Proposal must be amended and updated to apply basic management tools for species that are now recognized as best available science for the management of all species, such as identifying priority and secondary habitat areas and managing these in accordance with those basic tools. In addition to the implementation of best available science generally, the Organizations submit that the Proposal is in direct conflict with numerous specific management standards specifically stated in the 2013 LCAS and this must be corrected as well.

**5. Given the geographically scattered nature of the RGFO, management of RGFO lands that are more isolated in nature in a manner that is consistent with adjacent public lands should be a priority.**

We are unable to locate any portion of the RMP that provides such an analysis for these areas. Given the scattered nature of the RGFO in many areas, such an analysis is an important tool for the public to understand planning efforts as most of the time the public is simply not aware of the ownership of federal lands when they are recreating.

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<sup>15</sup> See, 2013 LCAS at pg. 83.

<sup>16</sup> See, 2013 LCAS at pg. 95.

<sup>17</sup> See, 2013 LCAS at pg. 84.

<sup>18</sup> See, 2013 LCAS at pg. 83.

<sup>19</sup> See, 2013 LCAS at pg. 26.

<sup>20</sup> See, 2013 LCAS at pg. 94.

<sup>21</sup> See, 2013 LCAS at pg. 91.

## **6. Backcountry area designations**

While we are opposed to Alternative B for a large number of reasons, the Organizations did welcome the idea of a backcountry area for management designation. This concept has been generally discussed in BLM Instruction Memo 2017-036 and the Organizations would support designation of this type in the preferred Alternative of the Proposal with the current management prescriptions. We believe that the BCA concept is a significant step in the right direction for the protection and utilization of resources in a less intensive manner than other areas, especially as provided for in the Proposal as the Proposal recognized motorized usage as a characteristic of these areas. Too often there is a perception that resource protection can only be achieved with closures and Wilderness like designations, which obviously we are opposed too. Additionally, many in the motorized are seeking a less intensive recreational experience in the backcountry. Many of our members are using their equipment to avoid the hustle and bustle of daily life and seek to avoid recreational areas that have high levels of visitation. We believe the BCA designation targets and provides these opportunities in its current form. We have supported similar designations that provide low intensity motorized usage areas in legislative efforts such as the designation of Special Management areas in the Hermosa Watershed Legislation that was passed into law in 2014.

## **7. Conclusion.**

The preferred Alternative (“D”) is acceptable to the Organizations with minor modifications to the Proposal, as Alternative D does not prohibit expansion of most areas of the Field Office for a wide range of uses including motorized recreation. While Alternative D does not prohibit OHV usage on large portions of the RGFO, this Alternative really only carries forward existing OHV areas and does not provide for expanded acres for multiple use recreation. The Organizations believe this will be problematic in the long term as the current recreational opportunity areas on the RGFO are easily overwhelmed and the State population continues to grow very quickly. As a result, identification of planned expansion areas will become critically important over the expected life of the RMP in order to expand opportunity for recreational usage in a thoughtful

manner. The imbalance of the current alternatives with regard to recreational usage is evidenced by the fact there are 8 units designated for hunting and fishing expansion but only four for multiple use.

The Organizations submit that the RGFO Proposal must also be brought into consistency with the 2013 LCAS. The Organizations would also support the alteration of the preferred Alternative to allow for the inclusion of Backcountry Area designations, as they are proposed in Alternative B of the Proposal. We support new designations that allow for the use and protection of resources for the public and we believe the BCA concept is such a management standard in its current form.

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

Scott Jones, Esq.  
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Trails Preservation Alliance

Enclosures