



November 17, 2019

USFS Rocky Mtn Regional Office
Att: Jason Robertson
1617 Cole Boulevard, Building 17
Lakewood, CO 80401

Re: Rocky mtn trail stewardship strategy comments

Dear Jason:

We would like to voice our support and concern for the Regional Trail Stewardship Strategy ("the Proposal"). There are certainly aspects of the Proposal we vigorously support, such as the expanded recognition of the economic importance of trails to local communities and the desire to expand access to trails in urban/front range areas. The Organizations are concerned that some of the most critical components of the National Trails strategy simply are not even addressed in the regional strategy, such as communication and engagement of staff under this new trail model. There are concerns regarding the elevation of Wilderness to a regional maintenance goal or the fact that many of these goals have been the target of extensive effort from the motorized community for decades and will result in greatly diminished value in goals to some of the regions strongest partners. While many other groups have yet to tackle issues such as travel management, the motorized community has completed one round of travel management and would be very concerned about reopening many of these decisions as they have yet to be implemented for any other decisions than route closures.

Prior to providing initial thoughts and concepts on the development of the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization the 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.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA advocates for the 30,000 registered snowmobiles in the State of Colorado. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. For purposes of this document CSA, COHVCO and TPA are identified as "the Organizations".

While the primary mission of the Organizations most directly relates to motorized recreation, the overall scope of the Organizations often has a larger impact as motorized recreation and access can take many forms and involve many activities, including camping, hunting and fishing and other recreational activities where motorized access to public lands is critical but not the primary recreational activity sought. Under federal land management standards, when an area is open to motorized access it is rarely closed to any other activity and in these areas the Organizations would welcome the support of other user groups in addressing sustainability challenges. We hope our upcoming meeting will help clarify our concerns about specific topics or standards that are being generally developed, as the motorized community believes these could have unintended negative consequences to motorized usage as many of these goals have been implemented for motorized usages for decades.

1. Numerous concepts in the Proposal the motorized community can support.

There are several concepts in the Proposal that the Organizations can directly support such as the inclusion of the SHIFT principals which highlight implementation of a user pay model for all forms of recreation. While the motorized community may have been the first to adopt this user pay model with trails on public lands, we never agreed to be the only group to adopt this principal and recognition of this by the USFS is important. As a result of the motorized community adopting the user pay model decades ago, this community is often far more able to implement changes and sustainability concepts than other groups but often this resource is simply not recognized in planning. This ability has created significant concerns about the possible unintended impacts of generalized standards in the Proposal that have already been completed for motorized usage.

a. The Organizations also welcome the recognition that all recreational activity has impacts. It has been the Organizations experience that too often many uses of public lands are thought to be without impacts, which clearly has never been the case. This misconception has resulted in a significant difference in the amount of analysis of basic concerns, like financial sustainability not being applied to some projects and other projects which have direct funding for sustainable maintenance being downgraded. This has also resulted in the motorized community resources being directed towards areas where impacts from other usages are the primary issue in the area.

b. Shared stewardship and shared routes. The Organizations also welcome the concept of shared routes on public lands and the introduction of this concept often needs to originate and be

supervised by USFS staff. Too often other user groups do not want to share trails with motorized usage in any form or simply say motorized users are not interested in the area that has been the basis of some type of planning. It has been our experience that often these grassroots planning efforts are only targeting a limited scope of usages. USFS must function as an impartial arbitrator of all interests that might be involved in a project or area in order to avoid the basic conflicts on trail proposals that is becoming far too frequent and exemplified by the Mad Rabbit Proposal in Steamboat, the West Magnolia project in Boulder or Gunnison Public Lands effort.

c. Trail expansion and addressing basic maintenance. In many areas of the region there simply are not enough trail based recreational opportunities roads and road to trail conversions and in many areas the existing trail network is simply blocked by fallen trees. The Organizations vigorously support the proposal strategy to:

- Strategy: Adapt to increasing population and trail use through deliberate and creative trail and trailhead development, and work with communities to prioritize front-country investments.

The Organizations would like to see this standard expanded to include expanded use of not only trails but also roads as the road network is an integral part of many forms of recreation. Low grade roads are often mistaken for trails by most users of public lands and represent significant opportunities for improved access. As was recently exemplified in the PSI settlement analysis, these low-grade roads are primary means of improving trail access and often this analysis is completely overlooked.

d. Economics. The Organizations welcome the elevation and reasonable analysis of economic contributions of trails and the negative impacts that can result when trails are closed. This is simply long overdue.

2. The need for engagement/communication is a goal of the national strategy but is omitted from the regional strategy.

The Organizations are concerned that there has been poor public engagement with partners on the regional strategy effort. Users and partners simply never participated in any discussions around this document and now have a week to comment on landscape goals that can be interpreted many ways. Generalized discussions around concepts are simply not a replacement for meaningful discussion of a document where these concepts have been distilled. While there are certainly USFS offices and forests where communication is exceptional, the growing trend appears to be towards less communication between partners and the USFS. This lack of communication appears to be a growing problem both with the motorized community and numerous other user and partner groups. Partnerships are based on trust and trust can be hard to earn and easily lost and good communication is a hallmark of a partnership.

The Organizations would like to see improved meaningful communication with the USFS and partners as a goal of this plan in a manner similar to the National Strategy. The National Strategy clearly identifies communication related issues as a goal in several locations such as:

Aspiration: Agency leaders, employees, and partners collectively understand the intent and latitude of laws, regulations, and policies. They use streamlined processes and innovative methods to collaboratively partner in stewarding a sustainable trail system.

Actions:

5.1 Remove Barriers: Identify and overcome real and perceived barriers to effective partnering and to using nontraditional funding sources, including providing improved communication, additional guidance for discretion in decision-making, and related training.¹

Additionally, the national strategy again highlights communication as follows:

Communication—We value the exchange of information that is up-to-date, accurate, widely available in multiple formats, and relevant to both trail users and those involved in sustainable trail planning, design, and maintenance.²

Improving communication is omitted in the regional strategy for reasons that remain unclear despite the fact the Organizations and many partners see this as a priority issue and properly recognized in the national strategy. The Organizations are all too familiar with the impacts of poor communication which often manifests itself in projects and positions with partners changing mid-project due to poor communication and other reasons. Basic positions should not change arbitrarily or mid project as these types of changes simply cause significant damage to partnerships. Ramifications of a project that stops partially through its course of implementation can take decades to repair. We are aware of efforts that have struggled with this issue in the motorized and non-motorized scopes of usage

Additionally, the diminishing communication between partners is the result of the fact that too often USFS and other land managers are attempting to use partnerships as an excuse to develop projects that simply fail to address multiple uses in an area. Again, this challenge is highlighted in the National Strategy but entirely omitted from the regional as the national strategy provides for this facilitation as follows:

4.2 Identify Sustainable Trail Systems: Collaboratively identify socially, ecologically, and economically sustainable trail systems across unit and jurisdictional boundaries, incorporating contemporary design principles and including potential new trails and ways of repurposing, realigning, or decommissioning existing trails.

4.4 Assess Proposed Trails: Evaluate new trail proposals to make sure they are sustainable and supported by adequate stewardship resources

¹ See, USDA Forest Service; National Strategy for a Sustainable Trail System; Dec 30, 2016 at pg. 5. Hereinafter referred to as the “National Strategy”.

² See, National Strategy at pg. 9.

The USFS must be the broker, moderator and arbitrator in this Strategy to ensure fair and balanced opportunities when developing and relying upon partnerships and local collaborations and leveraging of existing resources. Not every user group will be equally represented nor be as proficient in making their case as other user groups as many interests simply opposed to trails also have extensive paid staff located throughout the region. The USFS must ensure that a single user group, band of like users or special interests do not overwhelm and marginalize other users. This has been a major challenge on several projects and has resulted in poor implementation when the party that has been marginalized in planning is then asked to provide funding for the project. USFS should serve as a facilitator of communication in these situations and attempt to bring some form of balance to discussions.

The Organizations submit the regional strategy must recognize that partnership is a two-way street. Currently in many locations the phone only rings when USFS needs something from that partner but when there is an issue that might be of concern to the partner, the phone does not ring or calls are not returned. This simply must be resolved as this type of one-way communication is not a partnership.

3. The motorized community is significantly further in achieving many objectives than other user groups.

The fact that the motorized community is very differently situated as a result of the registration programs and years of collaboration on many of the challenges now being faced by other users directly impacts how we see many of the standards in the Proposal. A good example of this type of issue is provided by the following standard:

- Strategy: Work with local communities to evaluate user created trails for either inclusion in the trails system or for closure and decommissioning based on trail sustainability, and community values and interests.

We cannot overlook the fact that planning based on trail sustainability, community value and user interests sounds an awful lot like travel management. If this regional plan standard means applying travel management concepts to other usages, such as biking or hiking a 14er, the motorized community would vigorously support that.

However, the community is also very sensitive to any effort to reopen motorized travel management for additional closures due to ongoing conflict from some users about the multiple use concepts that govern public lands. We would also be concerned about reopening partially implemented travel managements, as most commonly the first action taken after travel management is the immediate implementation of any closures. After implementation of closures, opening any new route can remain a long and often incomplete process and as a result reopening partially implemented travel plans would result in significant restrictions in expanded access. This standard should be revised to clarify the scope and direction of the standard.

The Organizations submit the regional strategy is too focused on new partners and entirely fails to recognize existing partners many of whom have been partnering for almost 50 years. This is simply frustrating, as many of the basic challenges faced by other users have been addressed to some degree by the motorized community. This partnership has also freed significant resources from the agency to pursue projects for other user groups. As a result, many challenges such as parking facilities and basic maintenance are better addressed in motorized areas than other user areas, as exemplified by the fact that a portion of the good management crews funded in partnership with the CPW OHV program cut more than 12,000 trees off trails. While this total is impressive, it does not keep pace of the levels of falling trees but it also means that many motorized areas are simply in better shape with regard to forest health.

Our concerns on the disparate levels of implementation of many of these standards resulting from decades of funding being available could not be more perfectly exemplified than by the identification of leave no trace principals as a goal of the regional strategy. This type of user education is hugely valuable to all types of users, but the partnership and related funding available from the motorized community has allowed creation and operation of the Stay the Trail program in Colorado. The mission of Stay the Trail is to reinforce and highlight responsible OHV use in an effort to minimize resource damage on public lands.



Stay the Trail has been in operation for more than a decade and developed the logo above, which has become synonymous with motorized recreation in Colorado. In a surprising development the STT program has become so successful many users are identifying all recreation on public lands with the concept. The Organizations submit that failing to leverage the success of these types of partnerships in the regional strategy would be a mistake at best and perfectly exemplifies why the motorized community is simply in a different position than most other users.

4. Specific standards elevating all Wilderness maintenance are unwarranted and directly contradicts many other Proposal standards.

The Organizations support expanded trails for all uses but this simply cannot be addressed without recognition of the exceptionally limited amounts of funding that is available to certain types of trail usages and the inherent limitations on certain types of trails to be maintained cost effectively. The elevation of Wilderness based trails would be such a concern given the exceptionally low levels of usage of most Wilderness areas for recreation and the exceptionally high costs associated with maintaining these areas. While there are areas that see high levels of usage, these areas are not the norm and should be addressed on a case by case basis rather than

elevation of all Wilderness routes to a management priority. Unfortunately, the Proposal provides for such an elevation as follows:

- Goal: Manage trails in designated wilderness to protect wilderness resources and values.
 - Strategy: Maintain existing system trails and ensure the trail tread is clear of downed trees; and close user created routes.

We are concerned this standard is entirely new for the Regional document as Wilderness areas and trails were not identified as a priority in national strategy. As participants in national process we can confirm this idea was discussed and not included and we believe this was done for good reason. Wilderness recreation simply occurs at far too small a level to be recognized as a regional goal as wilderness recreation accounts for 4% of all visitation (or 1,374 responses of 33,466) in Region 2 per 2019 NVUM research.³ The Organizations submit that the elevation of Wilderness routes, that are visited by only 4% of all USFS visitors is an example of a situation where the aspirational goal is simply backwards. The Organizations submit that rather than heightening the access of 4% of all users, the USFS should look at this question on a cost benefit basis as this type of management more accurately reflects the needs of all 100% of users on public lands.

The Organizations would also note that the generalized nature of this goal would probably conflict with the stated intent of the Wilderness Act, mainly that these areas are untrammelled by man and provide a recreational experience in natural settings. This is not a minor or abstract concern but is rather an issue that the USFS has been sued over as exemplified by the recent challenge to the use of chainsaws for maintenance of routes in the South San Juan and Weminuche Wilderness areas. Users simply refuse to adopt new concepts or adapt in any way to address recreational challenges that are now being faced, and we don't see this as an issue that the USFS should concern themselves about. Apparently, the tree clogged trails are providing the recreational experience that many are seeking? We would question that but that is an issue for the wilderness users to resolve not a goal for regional planning.

Elevation of Wilderness trails as a management priority also conflicts with numerous other standards in the document

“Strategy: Focus resources to ensure the most heavily used portion of trail from the trailhead is maintained to standard.”

Elevation of Wilderness routes for general maintenance runs in direct contradiction to this standard. While we are not opposed to the existence of Wilderness trails or that recreational opportunity, the elevation of this usage is problematic for a regional planning document.

The Proposal also seeks to create an economic sustainable trail network. Based on our experiences Wilderness is 100x more expensive to maintain than multiple use areas. It has been

³ See, USDA Forest Service; Visitor Use Report Rocky Mtn Region; Covering 2010-2019 August 20, 2019 at pg. 11.

our experience that 100k can fund a multiple use crew covering 100-300 miles but similar funding in Wilderness only covers 1-3 miles on average. This type of internal inconsistency simply must be avoided in a regional planning document.

5. Need to clarify best available science instead of just research.

The term “Research” is frequently referenced in the regional trails document but is simply not explained or defined which is problematic at best. It has been the Organizations experience that effective issue management requires best available science and to comply with relevant planning requirements best available science must be relied on.⁴ The Organizations would have supported a stronger statement regarding best available science in the national strategy but this was not pursued but rather concepts of citizen science are stressed. The application of best available science has long been a priority for US Forest Service and determining what is best available science has again become a major topic of discussion as part of the assessments that are occurring in planning under the 2012 planning rule.⁵

US Fish and Wildlife Service recently issued new regulations to clarifying that best available science must be the priority for species listings and planners must avoid poorly created citizen science⁶. The need for credible science to guide management simply cannot be overstated as land managers have exceptionally limited funding and this limited funding must be guided towards largest challenges contributing to an issue. Planning based on credible science is the only way to ensure this goal is achieved.

6. An example of the confluence of many of our concerns.

Our concerns on this issue are not abstract and we believe an example of a recent issue encountered by the snowmobile community provides a great example of why we are concerned with the regional document. We are aware of citizen science efforts on the GMUG currently are targeting snow compaction as a citizen research goal based on various statements from USFS staff. This citizen science effort fails to recognize that snow compaction is universally recognized as a natural process that results from solar energy, wind and gravitational forces on the snow from sources including the avalanche prevention community, National Weather Service, Army Corps of Engineers, Construction community to name a few sources. Snow compaction has also been a major planning issue around the Canadian Lynx and only as a result of decades of research has that issue been resolved. The Organizations would hate to see that issue reopened.

⁴ See Generally, 36 CFR 219 and USFS Handbook 1909.12.07.12

⁵ See, Ryan et al; *Implementing the 2012 Forest Planning Rule; Best Available Science Information in Forest Planning Assessments*; Journal of Forest Sciences; For Sci 64(2) at pgs. 159-169; See also, USDA Forest Service; *The Science Consistency Review A Tool To Evaluate the Use of Scientific Information in Land Management Decisionmaking*; September 2003.

⁶ See, US Dept of Interior; US Fish and Wildlife Service; 50 CFR Part 424 [Docket Nos. FWS-HQ-ES-2015-0016 and DOC 150506429-6767-04; 4500030113] RIN 1018-BA53; 0648-BF06 Endangered and Threatened Wildlife and Plants; Revisions to the Regulations for Petitions; Sept 2016.

The poor communication on this issue is highlighted by the fact the motorized community submitted **hundreds of pages** of best available scientific research on snow compaction to the GMUG as part of the forest planning revision efforts. For reasons that remain unclear this information does not appear to be even recognized by the USFS staff supporting the citizen science efforts on snow compaction. This effort also degrades the existing partnership between USFS Rocky Mtn Research Station and the motorized community as the motorized community directly supported the lynx research efforts that recognized again that snow compaction is a natural process with direct funding and extensive logistical support. We simply cannot comprehend any credible citizen snow science that does not recognize this type of basic issue in planning would ever be applied or seen as valuable by the USFS.

This type of issue is not just limited to snow but frequently seen in recreation when air quality issues are raised in travel planning without regard to impacts of forest health or the fact that the Denver metro area is the largest contributor to air quality issues in the state. Further weakening of the best available science requirement in the regional strategy to merely requiring “research” does nothing but foster scientific research that fails to address basic scientific reality.

The Organizations would welcome a discussion of these comments and any other challenges that might be facing the USFS moving forward at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell (719) 338- 4106 or Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com.

Respectfully Submitted,



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