



April 12, 2020

Gila National Forest
Att: Plan Revision
3005 E. Camino del Bosque
Silver City, NM 88061

Re: Gila NF revised draft RMP/Planning

Dear Sirs:

Please accept this correspondence as the comments of the Trail Preservation Alliance (“TPA”) and the Off-Road Business Association (“ORBA”) with regard to the Gila National Forests Resource Management Plan revision ("the Proposal"). The TPA and ORBA will be collectively referred to as the Organizations for purposes of these comments. The Organizations would like to address two specific issues in the revised draft, which are: 1. Shorter RMP are better; and 2. CDNST management must be aligned with multiple use recreational requirements specifically provided in the National Trails System Act. The Organizations have not included a detailed discussion of our interests and backgrounds as those were discussed in detail in our first round of comments.

1. Shorter is better.

The Organizations welcome the generalized and shorter nature of the RMP when compared to the former Gila RMP plan, and we would support additional streamlining of the proposal. While the Organizations understand the desire to insert numerous small plans into a larger planning process, it has been the Organizations experience that merely combining numerous small plans into a single large plan results in poor analysis of issues facing these projects, poor coordination of planning efforts and an exceptionally complex plan that results in large barriers when landscape level plans issues are addressed. Often some of the complexity is the result of a desire to combine numerous small issues into the RMP in the belief that the RMP will expedite these

projects. This should be avoided as we are aware of a very limited number of site-specific projects that have been completed as the result of their inclusion in landscape level plans. Almost every one of the projects has required extensive site-specific analysis to complete and rarely has the landscape plan streamlined subsequent site-specific plans to levels that would justify the landscape level efforts.

The consolidation of multiple site-specific plans also yields a landscape plan that is VERY long and detailed. This length has proven to be a significant barrier to public participation in the planning process as most of the public lack the time or resources to review such a large planning document. This causes the public to oppose the plan even when there are very good things for the public in the plan. These overly complex and detailed plans also shorten the life and value of the plan as the plan simply lacks flexibility to adapt to changes in science or unforeseen challenges at the time of development. When these changes are encountered, the plan is simply irrelevant factually or recommending management that simply makes no sense in addressing on the ground issues. The current forest health situation on the Gila provides a perfect example of why RMPs must be flexible and avoid overly detailed analysis, mainly that the Gila is dealing with areas of the forest where tree mortality is easily at or above 90%. The Organizations submit that the current RMP has been a significant barrier to addressing this challenge, as planners in the 1980s were simply unable to understand the scope of the challenges that the forest could be facing almost 40 years after the plan was adopted. Again, these types of overdetailed analysis represent a situation that should be avoided in the development of the new Gila RMP. Shorter is better.

2. CDNST management.

Our second item of new information is the objection decision regarding the Rio Grande NF proposed management of their portions of the CDNST for horse and hike usage and not allowing nonconforming usages to approach or cross the CDNST. The objection decision required management of CDNST designated routes to be managed pursuant to the National Trails System Act on a segment by segment basis. We have not included the entire opinion as it is 88 pages in

length but only the portions addressing multiple use restrictions proposed on the trail and areas adjacent to the CDNST. We are sharing this decision with your office as the Rio Grande NF had proposed to restrict access to Horse and Hike only on the entire forest in their RMP and not allow uses approaching or crossing the CDNST that were inconsistent with the Horse and Hike restrictions in a manner very similar to the Gila Proposal.

The Objection Officer's decision overturning the Rio Grande proposed management for Horse and Hike usage with a direct application of the provisions of the NTSA allowing multiple uses on the trail is attached as Exhibit 1. The Organizations believe the decision generally speaks for itself. The Organizations have also attached a copy of the Rio Grande Objection to these comments, which addresses the multiple use protections, and the reasoning that restrictions on usages such as those proposed were not adopted as Exhibit 2. In addition to the similarity of challenges that remain on the Gila when compared to the times that CDNST management documents were developed is highly relevant to the discussion of management changes.

Given the challenges that are being faced on the CDNST and similarity of management proposals between the Forests, we thought the direct application of the NTSA provisions for the uses on the trail would be highly relevant to your discussions moving forward. If you would like additional information on this decision or its supporting documentation please let us know and we would be happy to share it with you.

3. Conclusion.

The Organizations are aware that often the lack of basic access to public lands due to management restrictions is a major management challenge when addressing large scale issues, such as poor forest health or drought. Providing a brief and balanced management goal and objective for the Forest would allow for future managers to address challenges from population growth and meaningfully address challenges to the Forest that simply might not even be thought of at this time. Why are The Organizations concerned? Too often recreational access to public lands is lost when maintenance cannot be performed in a cost-effective manner. Adding

additional management standards that will at a minimum need an additional round of NEPA planning to address future management challenges simply makes no sense.

The Organizations are very concerned that as exclusionary corridors around the CDT and other National Trail System Act routes have moved forward in resource planning, often these corridors immediately become non-motorized corridors without addressing existing usages of these corridor areas as exemplified by the multiple forests in California moving forward with winter travel planning and the adoption of the Desert Renewable Energy Conservation Plan in Southern California by the BLM and numerous forests in the Rocky Mountains. The Organizations are pleased to have been provided this opportunity to provide input on the Gila NF planning process and looks forward to working to resolve any issues as the plan moves forward. Please feel free to contact either Don Riggle at 719-338-4106 or by mail at 725 Palomar Lane, Colorado Springs CO 80906 or Scott Jones, Esq at 518-281-5810 or by mail at 508 Ashford Drive, Longmont, CO 80504 for copies of any documentation that is relied on in this appeal or if you should wish to discuss any of the concerns raised further.

Respectfully Submitted,



Scott Jones, Esq.
TPA/ORBA Authorized Representative



D.E. Riggle
Director of Operations
Trails Preservation Alliance



Fred Wiley, CNSA Past President ORBA President and CEO
One Voice Authorized Representative