



May 20, 2021

United States Department of the Interior
Bureau of Land Management
Royal Gorge Field Office
3028 E. Main Street
Cañon City, CO 81212

**SUBJECT: Pre-Scoping Public Input - Chaffee County Camping and Travel Management Plan
DOI-BLM-CO-F020-2021-0020 EA**

Please accept these comments from the Trails Preservation Alliance (TPA) in the BLM's request for comments for Pre- Scoping Public Input concerning the Chaffee County Camping and Travel Management Plan, DOI-BLM-CO-F020-2021-0020EA.

The TPA is a Colorado based 501 c 3 nonprofit organization whose primary mission is to preserve the opportunities for motorized single-track riding on public land. We partner with land management agencies to ensure that a fair and equitable amount of public land is available for motorized recreation. Additionally, the TPA partners with other clubs and organizations such as the Chaffee County based motorcycle club, Central Colorado Mountain Riders (CCMR), and jeep club, Colorado Off Road Enterprise (CORE.)

We appreciate the opportunity to engage with this process and recognize the issues that dispersed camping is having on public lands across the west. The TPA is committed to helping the RGFO find the best possible solutions to protect the resource while maintaining quality experiences for ALL users that value the camping opportunities provided on the public lands of the west and in this case Chaffee County.

The TPA has several grave concerns about this project and the process that the RGFO is proposing to use for this project. On advice of counsel, we have listed our most troublesome concerns regarding documents prepared by the RGFO and posted to the project website (<https://eplanning.blm.gov/eplanning-ui/project/2012291/510>):

- **The RGFO documents do not adequately articulate a Purpose and Need for this project. The Purpose and Need as currently published is not sufficient to examine a range of alternatives.**

- The RGFO has crafted the Purpose and Need too narrowly. In addition, the documentation and scoping materials for this project appear pre-decisional.
- The project must consider a range of alternatives in an Environmental Assessment (EA).
- “Travel management” should not be done in an EA. It is a major federal action requiring an Environmental Impact Statement (EIS).
- The Best Available Science on User Conflicts directly weighs against closures.
- Analysis and comments must not be arbitrarily limited to Chaffee County. BLM managed public lands and lands managed by the USFS extend well beyond the jurisdictional boundaries of Chaffee County. Limiting this project’s analysis to Chaffee County will preclude a holistic investigation and result in a myopic conclusion.
- Analysis of dispersed camping issues should be concurrently conducted with the USFS Salida Ranger District and the Arkansas Headwaters Recreation Area (ARHA) to avoid a Decision that results in adverse effects, or unintended consequences on lands adjacent to BLM properties but managed by other agencies.

For this Pre-Scoping phase of the project, the TPA is compelled to point out that dispersed camping involves more than just motorized users and is utilized by multiple and diverse outdoor recreation groups. This is extremely relevant to this project considering the limited access for OHV’s use and the proximity to many of the inventoried sites. On the contrary many of the inventoried sites are in very close proximity to many non-motorized recreational opportunities such as the Methodist Hills trail system, Colorado Trail Trailhead, Mt. Shavano Trailhead, and areas in close proximity to the AHRA managed land. In addition to the broad range of recreation users utilizing dispersed camping many social issues are also a factor. People living on public lands of which many are a part of the Upper Arkansas Valley’s workforce and people that are otherwise homeless all contribute to this issue. This is further evident within the plan’s inventoried sites near Salida which are inaccessible by vehicle. The TPA suggests the RGFO to not term or reference the issue as vehicle-based camping or motorized dispersed camping but rather just **Dispersed Camping**.

Other considerations and suggestions from the TPA include the following:

- Dispersed camping is currently, or is becoming, an issue on public land all over the western U.S., but especially near areas with various and diverse recreational opportunities. Some areas' efforts, such as Moab, to mitigate these impacts, including closures to dispersed camping or other management strategies such as designated

dispersed and paid camping, have only pushed the dispersed camping use to adjacent areas or the next available location. Trying to resolve this issue by only addressing BLM managed lands in Chaffee County will only push the use and “stress” to adjacent lands managed by other agencies within Chaffee County or to neighboring counties including Fremont, Gunnison, Lake, Park and Saguache. Most users do not camp or recreate based on a particular land management agency, county or state jurisdiction. Why then would the RGFO attempt to take this approach to manage this issue? To adequately curtail and manage the dispersed camping issue a more holistic approach that involves ALL the agencies and adjacent counties that could experience the effects of this Decision must be included. Without this we are only transposing the issue, not resolving it.

- This plan incorporates two distinct processes, Travel Management Planning (TMP) and a plan to address dispersed camping issues. These are acknowledged by the RGFO as two separate processes. However, Travel Management Planning, generally requires a more detailed and arduous Environment Impact Study (EIS) when it is determined that a “significant” change is adopted that could affect the human environment. Travel Management Planning is arguably a significant change and should not be done in an Environmental Assessment (EA.) It could also be that the closure or new management strategy of hundreds of dispersed campsites could arguably be considered “significant” changes. The BLM should address Travel Management Planning for the Shavano and Pass Creek areas separately from dispersed camping planning.
- The pre-scoping questions posed to the public seem to be focused on limiting and “closing” camping opportunities. Given the increase in use and recreational opportunities created in the area, why would the questions and suggestions for comments be focused on reduction or elimination of an obvious (and increasing) demand? These questions and suggestions could be perceived as pre-decisional or as pushing the agenda of a special interest group. To achieve the best possible Alternatives, the TPA suggests the RGFO must also include suggestions about where to create and expand camping opportunities. In addition these suggestions should be open to areas not identified in this process as having camping issues and/or that could potentially see the effects of the outcome of this Decision. For example lands that are easily accessible to popular trailheads, communities in the area and fishing access on the Arkansas River should all be considered for potential camping development. A broader scope of questions and suggestions should be provided.

- The planning approach seems to insinuate the issue is recreation vs. conservation. This leads to the perception that you can only have one or the other. However, proper management strategies should allow for the two concepts to coexist.

- The TPA offers a brief summary of research into user conflict. Researchers have specifically identified that properly determining the basis for, or type of user conflict (personal vs social conflict,) is critical to determining the proper method for managing this conflict. Scientific analysis defines the division of conflicts as follows:
 - “For interpersonal conflict to occur, the physical presence or behavior of an individual or a group of recreationists must interfere with the goals of another individual or group....Social values conflict, on the other hand, can occur between groups who do not share the same norms (Ruddell & Gramann, 1994) and/or values (Saremba & Gill, 1991), independent of the physical presence or actual contact between the groups.....When the conflict stems from interpersonal conflict, zoning incompatible users into different locations of the resource is an effective strategy. When the source of conflict is differences in values, however, zoning is not likely to be very effective. In the Mt. Evans study (Vaske et al., 1995), for example, physically separating hunters from nonhunters did not resolve the conflict in social values expressed by the nonhunting group. Just knowing that people hunt in the area resulted in the perception of conflict. For these types of situations, efforts designed to educate and inform the different visiting publics about the reasons underlying management actions may be more effective in reducing conflict.”¹

- Other researchers have distinguished types of user conflicts based on a goals interference distinction, described as follows:
 - “The travel management planning process did not directly assess the prevalence of on-site conflict between non-motorized groups accessing and using the yurts and adjacent motorized users.... The common definition of recreation conflict for an individual assumes that people recreate in order to achieve certain goals, and defines conflict as “goal interference attributed to another's behavior” (Jacob & Schreyer, 1980, p. 369). Therefore, conflict as goal interference is not an objective state, but is an individual's appraisal of past and future social contacts that influences either direct or indirect conflict. It is important to note that the absence of recreational goal attainment alone is insufficient to denote the

¹ See, Carothers, P., Vaske, J. J., & Donnelly, M. P. (2001). *Social values versus interpersonal conflict among hikers and mountain biker*; *Journal of Leisure Sciences*, 23(1) at pg. 58.

presence of conflict. The perceived source of this goal interference must be identified as other individuals.”²

- An overwhelming portion of user conflict results from a lack of social acceptance by certain users and these conflicts will only be resolved with education. The TPA believes the distinction between personal and social user conflict must be distinguished and addressed in this process. Any proposed changes must be reviewed to ensure those changes do not generate, and result in, an increase in user conflicts.

The TPA thanks the RGFO for reviewing and considering our comments and suggestions. We would welcome a discussion of these comments at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to be 'CHAD HIXON', with a long, sweeping underline that extends to the right.

Chad Hixon
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² See, Norling et al; *Conflict attributed to snowmobiles in a sample of backcountry, non-motorized yurt users in the Wasatch –Cache National Forest*; Utah State University; 2009 at pg. 3.