



23 November 2022

Bureau of Land Management
Royal Gorge Field Office
Attn: Linda Skinner
3028 E. Main St.
Canon City, CO 81212

SUBJECT: Scoping Comments for the Penrose Commons Recreation Area Management Plan (RAMP) - DOI-BLM-CO-F020-2023-0001-EA

Dear Ms. Skinner:

Please accept these Scoping Comments from the Colorado Trails Preservation Alliance (TPA) for the Penrose Commons Recreation Area Management Plan (RAMP), Environmental Assessment. The TPA is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities.

The TPA's comments submitted for the Scoping period of this project are as follows:

1. Penrose Commons is an ideal location to expand OHV opportunities due to its proximity to Colorado's Front Range and extended riding season. With Penrose Commons' close proximity to major Front Range population centers, this area should be considered for the unique opportunity it provides to educate and train OHV users on proper machine operation, trail ethics, trail stewardship and safe machine operation.
2. Penrose Commons is currently managed for OHV recreation but lacks the adequate infrastructure to provide users with their desired experience i.e., no legal multiple-use single-track, limited camping, and a full-size trail system to accommodate and meet the recreational needs and desires of the growing number of UTV/side-by side users.
3. Providing the public with High Quality Recreational Opportunities coupled with Varied and Diverse Opportunities will lead to success, and reward the BLM with fewer future management issues, enhanced resource protection and improved sustainability.
4. Penrose Commons is an area especially suitable for motorized single-track as proven by the existing single-track trail system. Consider including, adopting and improving existing motorized single-track trails for motorcycles within the Penrose Commons area.

Single-track trails/opportunities should include a spectrum and a diversity of single-track riding especially for beginners, immediate riders and children. New trail plans should strive to make the area more balanced and attractive to all abilities and users. Single-track trails for motorcyclists should provide: access to scenic opportunities, opportunities to view wildlife, provide a variety of experiences and difficulty levels, opportunities for riders to build skills and educate riders on stewardship.

5. The “difficult to extreme” characteristics of the existing trail system should be maintained. Consider improvements to the opportunities serving full-size vehicles including expansion of existing rock crawling and extremely difficult full-size vehicle routes.
6. Consider the inclusion of an open riding area(s) specifically for Trials motorcycles so that Trials riders are able to train and ride without a special use/event permit.
7. Existing trails and routes should be utilized to the maximum extent possible. However, it may be beneficial for resource protection/preservation and superior recreational opportunities to construct new trails and routes that connect existing routes and trails and enhance recreational opportunities (e.g., provide loops, eliminate out and back, etc.) while protecting resources.
8. Camping goes hand in hand with a variety of recreational activities. Shifting management of camping in Penrose Commons to designated dispersed with some group sites could minimize resource damages and conflicts with grazing permittees.
9. When possible, separation of off-highway motorcycle recreation from full-size/side-by-side recreation to improve safety and reduce the potential for collisions. Consider a select use of one-way trails to increase safety.
10. The TPA encourages the Royal Gorge Field Office to utilize the *Great Trails Guidebook* authored by Dick Dufourd and published by NOHVCC when evaluating and developing improvements to the system of trails and routes at Penrose Commons.
(<https://nohvcc.org/education/manager-education/great-trails-guidebook/>)

Your careful and thorough consideration of the Scoping comments submitted by the Trails Preservation Alliance will be genuinely appreciated.

Sincerely,



Chad Hixon
Executive Director
Trails Preservation Alliance