



San Juan Plan Revision
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<http://ocs.fortlewis.edu/forestPlan>

To the SJPLC Plan Review Committee,

This is a consolidated response from the Trails Preservation Alliance (TPA) and the Colorado Off Highway Vehicle Coalition (COHVCO). COHVCO represents over 200,000 off high vehicle Colorado recreation users, as well as thousands of recreation tourists that visit Colorado each year.

Colorado Trails Preservation Alliance (TPA) is a non-profit organization whose primary goal is to preserve single track motorized trails in Colorado. TPA represents over 2,000 members. TPA works to sustain and enhance motorized recreation opportunities with local motorized riding groups and clubs such as the San Juan Trail Riders (SJTR), Public Access Preservation Association (PAPA), Thunder Mountain Four Wheelers (TMFW), Western Slope 4 Wheelers as well as state and national level organizations such as Colorado Association of 4-Wheel Drive Clubs, Ride with Respect, COHVCO and the Blue Ribbon Coalition (BCR). TPA has worked on several projects in partnership with the Forest Service and Bureau of Land Management. TPA is in continual communication with local user groups regarding travel management planning processes on the SJPLC.

TPA believes the DLMP/DEIS is undermining this process by proposing to designate motorized travel suitability areas. Our members and members of local riding groups such as the San Juan Trail Riders (SJTR) feel confused, overwhelmed and under valued by this plan. We do not believe the agencies are living up to their stewardship principle of working with partners collaboratively to come to better informed decisions. We believe the agencies have the responsibility to analyze and decide on motorized travel suitability areas within the travel planning process in accordance with the 2005 Travel Management Rule. The travel management planning process started by the agencies in 2006 is a more comprehensive process, it does not make sense to now narrow the analysis and public participation of that process arbitrarily as proposed in this DLMP/DEIS.

We are submitting the following comments to provide you information regarding OHV recreational interests. We hope this information will be used to reexamine and eliminate from this plan the designation of motorized travel suitability areas. We have attached as an appendix to these comments the Public Input – OHV Recreation on the San Juan National Forest report, prepared by the San Juan Trail Riders September 30, 2005 (Appendix A). We are submitting this report to be included in our comments as relevant information to the DLMP/DEIS analysis.

Concern and Comments to DEIS Volume 1

Concern: Page 1.11, section 1.4.1 – Key Decisions to Be Made in the Plan Revisions

The key decisions to be made in the integrated DLMP/DEIS is to establish management area direction and identify and allocating allowable uses and areas. However, the key decision of allocating lands as suitable or unsuitable to motorized travel is not based on consideration of relevant factors or adequate consideration of circumstances.

Designating land suitable and non-suitable to motorized travel prior to or simultaneously with travel management planning as directed by the USFS 2005 Travel Management Rule (TMR) negates public and user group involvement efforts, confuses the public, does not enable effective public participation and narrows alternatives in current and subsequent travel management planning efforts.

Comments: *Please provide clear and rational connection between the existing motorized trail condition and how or why areas identified in the DLMP/DEIS are suitable or unsuitable to motorized travel.*

Over ground motorized suitability areas should not be proposed or determined as part of the LMP/EIS. These areas should be determined by the travel management process in accordance with the 2005 Travel Management Rule or the Forest Service and BLM must allow for full and fair evaluation of all existing and potential motorized travel routes in DEIS/DLMP and live up to its commitment and general managing principle of community based stewardship, citizen participation to identify such routes and consider them on a site specific basis before deciding on land use allocations for motorized travel.

Concern: Page 1.13, section 1.4.4 - Consistency of Decisions Between Projects and Plans

This section states that under federal regulations all projects and/or activities authorized by the BLM and USFS must be consistent with the LMP/EIS. The FS activity of travel management planning which began on the SJNF in 2006 in accordance with the 2005 Travel Management Rule is not consistent with the proposed DLMP/DEIS.

Districts and user groups have been painstakingly identifying routes to consider for designation, many of these routes fall outside of areas proposed suitable to motorized travel in the DEIS/DLMP at the same time this plan eliminates many feasible motorized routes from consideration in travel management planning. This is clearly the cart before the horse.

Comment: *Please provide explanation of how the agencies plan to reconcile these inconsistencies.*

Concern: Page 1.15, section 1.5.1 Purpose and Need for Plan Revision

The DEIS states that management direction in the existing plan needs updating in order to: 'help resolve travel management conflicts and provide a better basis for subsequent site-specific decisions on designated routes for motorized travel' .

Comment: *Please clarify what management direction is provided that will allow for a 'better basis' for subsequent site-specific decisions on designated routes for motorized travel.*

Concern: Page 2.29, section 2.7.2, Alternative B (The Preferred Alternative), Issue Two – Providing Recreation and Travel Management within a Suitable Ecological Framework

Under Alternative B, there is a 47% reduction in available acres open to motorized travel. The Forest Service has determined this reduction in acres by identifying areas already prohibited (Wilderness, WSAs, etc.), areas not conducive due to resource impacts and by 'tightening suitable boundaries in order to reflect areas with existing and desirable motorized routes, by identifying areas without any existing motorized routes as unsuitable, and identifying suitable opportunity areas within MA 5's'.

Comments: *The DEIS/DLMP should specifically identify (provide a map) the locations of existing and desirable motorized routes and the location of areas without motorized routes so that the basis of determining areas suitable or unsuitable to motorized travel is supported in alternatives B, C and D. Furthermore the DEIS/DLMP should provide the definition of existing and desired routes and how such routes were determined to fit these definitions.*

The reduction in available acres was determined in part by identifying areas without any existing motorized routes, please clarify if these acres included areas with non-system, user created routes.

Concern: The Forest Service also states that under alternative B, suitable areas identified generally have an existing developed road and/or motorized trail system that adequately serves the recreation and resource access needs of the particular area.

Comment: *The DEIS/DLMP should provide the basis to support the conclusion that suitable areas under Alternative B adequately serve the recreation and resource access needs of the particular area.*

Concern: Page 3.372, Introduction – Access and Travel Management

The DLMP/DEIS states the travel planning process initiated in 2006 is a separate process from the development of the DLMP/DEIS and entails a separate public involvement process and NEPA analysis. However, when a revised LMP is implemented the travel suitability area classifications will be employed as the baseline condition for this travel planning.

Comment: *A revised LMP which identifies travel suitability areas (motorized and non-motorized) as proposed in any of the alternatives as the baseline condition misrepresents the existing condition and does not address the impacts to motorized trail or road recreation. Please clarify the parameters used in this analysis to identify the motorized travel and access condition.*

Concern: Page 3.374 – The DLMP/DEIS states there are more than 500 miles of authorized USFS and BLM motorized trails within the planning area and estimate that there are more than 3,400 miles of unauthorized road and trails within the planning area.

Comment: *Please clarify of the 3,400 how many miles are estimated to be “unauthorized” motorized trails.*

Concern: Page 3.378, Road Use- The DLMP/DEIS states travel management planning is becoming increasingly important tool for reducing resource impacts and for coordinating uses. Furthermore, there has been a dramatic increase in the use by ATV’s/OHV, snowmobiles and mountain bikes and that these uses have led to a proliferation of unauthorized, user created routes, especially in areas historically open to cross-country motorized travel.

Comment: *The Forest Service identifies users created routes in historically open cross-country travel areas as unauthorized. This makes no sense. In areas historically open to cross-country travel, routes are inherently authorized by the fact that they are open to cross country travel unless agencies specifically and legally closed routes with a closure order. The Forest Service identified these areas as open to cross country travel then with the onset of ATV’s/ OHV’s and increases in recreating population user created routes began to increase. The agencies cannot go back and now declare those routes as “unauthorized” and not consider them in their baseline data of existing condition or recognize them as legal routes in this or any other motorized travel or recreation analysis.*

Please identify and analyze all motorized routes within the areas currently classified as open to cross country travel that have not been legally closed by a closure order.

Concern: Page 3.379 Impacts Related to Management Area (MA) Designations – The motorized travel suitability classifications define the parameters by which future motorized road and trail designations may subsequently be made, in accordance with the USFS 2005 Travel Management Rule.

Comment: *The motorized suitability classification decision made in the LMP will define parameters for future motorized trails and roads designations, in effect the LMP will narrow the scope of motorized trail opportunities in the travel planning process implemented in 2006. Narrowing the scope of opportunity in the travel management*

planning process is neither fair to user groups or follows direction set forth in the 2005 TMR of considering feasible user created routes.

Page 3.382 Impacts Related to Recreation – The preferred alternative, Alternative B would result in moderate (11%) reduction in motorized trail miles.

Comment: The 11% reduction in motorized trail miles is a misrepresentation, it only takes into account a small percentage of existing trails. The impacts to motorized recreation users from reduction or loss of user-created, non-system trails and trails not shown on the SJNF 2005 Visitor Map must be included in an analysis of direct and indirect impacts to recreation.

The San Juan Trail Riders Public Input report dated September 30, 2005 (see Appendix A, Public Input OHV Recreation on the San Juan National Forest) provides a GPS survey of existing trails within 10 individual zones on the San Juan Public Lands. This report and accompanying maps reflect existing condition of motorized routes and recreational opportunities on SJPL. Please identify the impacts to routes identified in this report from the proposed alternatives.

Concern: Page 3.384-3.385, Table 3.19.6, Approximate Change in Designated Road and Motorized Trail Mileage by Alternative - The table notes that no non-system, user-created or system routes that are not depicted on the SJNF Visitor Map (2005) area used in the analysis of direct and indirect impacts.

Comments: The DLMP/DEIS must analyze the environmental consequences by alternative; direct, indirect and cumulative impacts to recreation and recreational opportunities from the use of non-system, user-created or system routes not depicted on the SJNF Visitor Map. These routes exist on the ground, are being used by recreationists and most are not legally closed therefore whether the FS or BLM has numbered or designated is irrelevant, not considering them in an analysis of suitable motorized areas and as legitimate recreation opportunities is irresponsible and negligent.

By not considering non-system, user-created or system routes not depicted on SJNF Visitor Map significantly narrows alternatives within the travel planning process and blatantly disregards direction and policy of the set forth by the Travel Management Rule.

The tables and narrative in section 3.19 do not provide specific enough information to make substantive comments regarding changes by alternatives to motorized road and trail mileage and impacts to recreation. Please provide a map of the authorized motorized trails that are being considered how each alternative proposes to change trail mileages and their location.

Please provide a breakdown of miles of motorized trails being considered in the DLMP/DEIS by route name and miles on BLM vs Forest Service lands.

Comments: Please consider in your analysis and decision the following trail specific comments related to motorized travel suitability designations in Alternative B, the USFS preferred alternative:

1. There are several areas that are west of Hwy 145 that are depicted as unsuitable for motorized travel. The first area has as its eastern boundary Hwy 145, its northern boundary Rico, southern boundary is at approximately the Priest Gulch Trail head, with its western boundary approximately in line with Taylor Mesa. This area has long been used by single track motorcycle riders in cooperation with the USFS and the trails that would be negatively affected by an unsuitability designation are as follows: Eagle Peak Trail #624, Spring Creek Trail #627, Twin Spring Trails # 739 and 625, Priest Gulch Trail # 645, Cut off trail #201, Calico Trail# 208, Section House Draw Trail #200, School House Draw Trail # 660, Tenderfoot Creek Trail # 644, Wildcat Creek Trail# 207, Burnette Creek Trail# 641, and Horse Creek Trail. The second area depicted as unsuitable in Alternative B is the area north on Hwy 145 up Stoner Creek including the Stoner Creek Trail# 625. The Stoner Creek Trail is currently not being managed as a motorized route but the western boundary of this area shown as unsuitable is in line with the Lower Stoner Mesa Trail# 624 which is currently being managed as a motorized route and is one of the many trails in the area that is being maintained by SJTR in cooperation with the USFS.

2. The area that is on the east side of Hwy 145 that is depicted as unsuitable for motorized travel is often referred to as the Bear Creek Valley. It includes the Bear Creek Trail# 607, Morrison Trail# 610, Little Bear Creek Trail# 435, Grindstone Trails# 608 and 658, Gold Run Trail# 618, and USFS Trail# 609 all of which have historical motorized use and would be negatively affected if the unsuitable designation is not changed. All of these trails are also currently being studied as part of the Dolores District Travel Management Plan, Rico Landscape.

3. The proposed Hermosa Wilderness Area and or its designation as unsuitable for motorized travel would also directly have a negative effect on motorized travel. If designated as unsuitable motorized users would lose the Clear Creek Trail# 550, and Corral Draw Trail# 521 with Corral Draw Trail being an important connector trail to FS Road# 564 and to the other trails and roads in the Dolores River canyon. Both of these trails are currently being managed as motorized trails and it is important to note that SJTR has worked with the USFS for years to maintain Clear Creek Trail as part of the Adopt a Trail Program. If designated as unsuitable or as wilderness we would also lose the ability to discuss the possibility of reopening of several other trails that have historical motorized use including the South Fork of the Hermosa Trail#549, and Big Bend Trail#519.

4. The area on the east side of the Hermosa River that is depicted as unsuitable contains several trails including the Little Elk Creek Trail# 515, and the eastern portion of the Big Bend Trail# 519 that could potentially be considered for motorized travel. In addition the Salt Creek Trail (no USFS number but shown on USFS maps) and several user created routes in the Hermosa drainage would be lost if this area

remains in the unsuitable category and the forest plan is adopted before the travel management plans that are currently underway are concluded.

5. The area shown as unsuitable that has its boundaries Silverton and South Mineral Creek on the north, Cascade Creek on the south, Hwy 550 on the east and Dolores and San Juan County boundaries on the west contains numerous trails that have historical motorized use. While none of these trails are currently being managed as motorized this area should not be designated as unsuitable. We will be asking for the following trails to be considered for motorized use during the travel management process that is currently taking place in the San Juan National Forest: Engine Creek Trail# 657, USFS Trail# 508, Coal Creek Trail# 677, Deer Creek Trail (no number), West Lime Creek Trail# 679.

6. The areas north and east of Durango on both sides of Missionary Ridge also have historical motorized use and are shown as unsuitable in alternative B. The following trails would be negatively affected by such a designation: Red Creek Trail# 727, Haflin Creek Trail# 557, Missionary Ridge Trail# 543, Stevens Creek Trail# 728, Shearer Creek Trail# 558, Youngs Canyon Trails# 546. In addition there is upwards of a thousand miles of logging roads that were built in the 1950's and 1960's that would make excellent ATV routes many of which would be eliminated from consideration if this area is designated as unsuitable.

7. The area between Lemon Reservoir on the west and Vallecito Reservoir on the east that has as its northern boundary the Weminuche Wilderness and as its southern boundary the USFS boundary also has countless miles of old logging roads which we have advocated would make excellent ATV routes. There is also a USFS Trail#534 that is a connection between the Lemon and Vallecito areas which would be eliminated for consideration as a motorized route if the unsuitable status that this area has been given remains and the forest plan is adopted before the travel management plans that are currently underway are completed.

8. A large portion of the area that has as its southern and western boundaries the Southern Ute Indian Reservation and is in the middle of the HD Mountains has both user created and USFS system roads and also includes the Pine-Piedra Stock Driveway and is shown as unsuitable in alternative B. SJTR has inventoried these routes and they have been verified by USFS personnel. It would be a great loss to not only to the motorized users in both the communities of Ignacio, and Bayfield Colorado but to the general public if this area is designated as unsuitable for motorized travel.

9. The area that has as its western boundary the Treasure Mountain Trail# 565, and its north and eastern boundary the Continental Divide Trail also is shown as unsuitable for motorized travel even though there is a trail in the area that has historical motorized use. This trail is the Silver Creek Trail#567. This trail which connects to the Continental Divide Trail and to the many roads that are adjacent to it

in the Rio Grande National forest should be considered for motorized travel in the current travel management process.

Concern: Page 3.387, Table 3.19.7 – Summary of Direct and Indirect Impacts by Alternative

Comment: *To fully disclose the direct and indirect impacts to recreation from the proposal to change motorized suitability areas, please include the number and location of all existing (system, designated, non-system, and user created) motorized trail miles that are in the Forest Service GIS data base.*

Page 3.388 Cumulative Impacts

Comment: *The cumulative impacts to recreation from proposed changes in access and travel management should be identified and analyzed.*

Concern: Page 3.398 – Recreation Issues and Need for Changes – In this section the DLMP/DEIS identifies recreation as the most extensive, and economically valuable, resource within the planning area. It further identifies that recreation sustainability in SJPLC is dependent on partnerships and collaborative efforts.

Comment: *Based on the above fact it is imperative that the LMP/EIS not consider motorized travel suitability areas in this plan and allow for the travel management process according to the 2005 TMR to delineate motorized travel suitability areas. The agencies must enable effective public participation to make important recreation resource decisions. The travel planning process is the most effective means for collaborative efforts and partnership input in travel management.*

Concern: Page 3.401 and 3.406 – Impacts Related to Travel and Access Management

Comments: *Identifying motorized travel suitability areas by alternative in the DLMP/DEIS (Chapt. 2 and Figures 2.5, 2.7 and 2.9) will directly, indirectly and cumulatively effect the current and future planning, environmental analysis and implementation of the recent travel management policy (2005 Travel Management Rule), therefore the effects to travel management planning and environmental analysis is within the scope of this plan. The DLMP/DEIS is obligated to address the effects of designating motorized travel suitability areas on the current travel management planning efforts by specific landscape areas.*

As described, Alternative C maintains the greatest amount of non-motorized recreation experiences, followed by Alternative B, and then D. Furthermore Alternative C closes several very popular single track trails, including Calico and Hermosa Creek, to motorized over-ground use. Table 3.19.6 identifies closures on portions (miles) or all of specific trails in the planning area. In effect this plan is making site specific travel

management decisions and must disclose how these individual trail closures will affect the recreation resource.

Please provide evidence that public participation was involved in these site specific trail closure proposals.

Please disclose how specific land areas were determined to “not currently have motorized opportunities” (besides those classified as WSA’s and RNA’s) and therefore classified as unsuitable to motorized travel.

Concern: Page 3.415 Cumulative Impacts - Future off-trail (“open areas”)

Comment: The policy shift on travel and access from open unless closed, to closed unless open changes resource impacts related to motorized recreation and is within the scope of this plan. This plan is proposing motorized travel suitability areas which would be open or closed to over-ground motorized travel, this action will indirectly and cumulative effect planning and implementation in accordance with the 2005 Travel Management Rule policy and direction.

Concern: The Future of Public Land Recreation Management

This section focuses on reduced agency recreation budgets and its effects on recreational opportunities. Of course this is exasperated due to the fact that the demand for recreational opportunities is increasing. The agencies have become dependent on collaborative relationships with user groups, volunteers, etc. and outside sources such as State of Colorado OHV-grants to accomplishing trail maintenance and recreational planning. The Forest service needs to live up to its 2001 USFS Recreation Agenda “Continuing to support existing and establishing new professionally managed partnerships and intergovernmental cooperative efforts as a significant means to accomplish the recreation job”. TPA and local groups such as San Juan Trail Riders do not believe delineating motorized travel suitability areas in the DLMP/DEIS is appropriate or allows for user group members to participate meaningfully. Motorized user groups have intimate knowledge of trails which occur on-the-ground, this plan must consider that knowledge and support motorized user groups as partners.

Concern: Page 3.556 – Figure 3.34.1 Recommended Wilderness Alternative B

Comment: The Hermosa recommended wilderness area DOES NOT have Wilderness character as defined by Forest Service criteria. It is not a large area “unimpacted by human presence”. It is covered in trails with historic motorized and mechanized bicycle use and has other roads and trails.

Comments to DLMP Volume 2

Concern: Page 53 – Desired Conditions- Access and Travel Management

Comment: *To meet desired conditions 14.3, 14.11, and 14.12 the agencies should allow the travel management planning process to define areas of motorized travel suitability.*

Concern: Page 117 – Strategy / Objectives - Communities and Partners

Comment: *TPA and other partners also emphasize working closely to solve complex resource management situations. We are deeply interested in protecting and enhancing recreation benefits. However our members feel at loss with this broad planning and more comfortable participating in the current travel management planning process which began in 2006 on the SJNF. The agencies should not close opportunities to work collaboratively with their communities and partners in determining motorized recreation areas and future motorized recreation opportunities. The agencies should allow for the travel management process to designate motorized travel suitability areas, it is a more comprehensive process and will lead to better decisions.*

Concern: Page 119, Program Objectives – Recreation

Comment: *Objective L.2 - TPA and San Juan Trail Riders will work collaboratively with the agencies to accomplish the objective of designating routes and/or designated areas for motorized and mechanized recreation travel within 5 years.*

Concern: Page 140, Motorized Travel Suitability

Comment: *The DLMP states that over-ground motorized suitability areas will provide a “framework” for subsequent route-by-route decisions occurring outside of the LMP. Please clarify what the “framework” consists of.*

Motorized suitability areas should be eliminated from consideration in this broad level plan. There is no clear basis, evidence or connection between the existing motorized travel condition and the designation of suitable areas for these uses. Designating motorized suitability areas in effect is making site specific decisions regarding which motorized trails will remain open and which will be closed, narrows alternatives in travel management planning by landscape area and limits effective public participation.

TPA, San Juan Trail Riders, other Colorado OHV clubs and organizations have fundamental concerns with the fact that the SJPLC Forest Plan has developed and proposed motorized travel suitability areas prior to the completion and submission of individual travel management Environmental Assessments at the District level (by landscape areas) . It is inconceivable that a truly comprehensive, viable and sustainable Forest Plan could be developed without specific, detailed, accurate, user supported and district specific plans (EA) being utilized as the foundation. Through multiple conversations with district Forest Service representatives at all levels, and our own observations / involvement with the process, the process as it stands is truly the “cart



before the horse". The overall result of continuing on this path will only result in a plan that is flawed, unacceptable to many, unenforceable and most of all, not sustainable.

TPA will continue to work diligently, in the best interest of the motorized user community and our SJNF leadership, to support plans which serve the largest segment and interest of the general public. We greatly appreciate the work of the Planning Committee and fully understand the challenges they face in development of the best overall plan possible. The TPA and COHVCO are available to meet with the SJ staff to work out a solution for all of the issues listed above.

Thank you,

Don Riggle
Trails Preservation Alliance

Cc: Gary Wilkinson, President San Juan trail Riders
Cc: Allen C. Christy, Director San Juan Trail Riders
Cc: Tom Thomas, President, Public Access Preservation Association
Cc: Walt Blackburn, Thunder Mountain Wheelers
Cc: Ken Emory, Colorado Association of 4-Wheel Drive Clubs



APPENDIX A

Public Input – SJNF Revised Forest Plan
OHV Recreation on the San Juan National Forest
September 30, 2005