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5/2/08

Subject: Pagosa FS District Ranger EA of the TMR

Dear Sir,

This letter is a combined response from the Trails Preservation Alliance (TPA) and the Colorado off Highway Vehicle Coalition, (COHVCO to the Pagosa Ranger District's Environmental Assessment on their proposed implementation of their Travel Management Rule. This is also a letter of protest based on the lack of a thorough, integrated, collaborative transportation assessment in context with an updated Forest Plan.

Despite multiple public meetings, carefully crafted data, justifications, and personal visit discussions (all based on continued references and understanding of the Travel Management Rule) we find that the Pagosa District Travel Management Rule Analysis and Draft Environmental Assessment is an entirely inadequate document.

The document and Travel Rule implementation on this District, as well as across the Region has been rushed to comply with a 2009 due date set by the Forest Service. However, the Secretary of Agriculture (Fed. Reg. Vol.70, No., 216 Pg. 68269) stated that setting an enforceable deadline would create law suit problems, not allow parties the best hope for long term resolutions, and make collaborative solutions more difficult. As a result of the deadlines that have been proposed, the Pagosa District has artificially limited its alternatives to two, then conveniently cast off valid trail designation recommendations and other alternatives (including their own proposed alternative) as "being outside the scope" of this analysis and NEPA process.

The stated justification for this limited analysis include (see EA page 2 and 3):

1. There is no need to reconsider decisions made prior to the TMR.
2. Currently we do not have sufficient resources to perform an analysis on every route within the time frame.
3. The District is precluded from a broader analysis because of non-discretionary oil and gas exploration proposals, fuels reduction and a variety of land management related projects.

4. A lack of availability of resource specialists.
5. A lack of funding to conduct a broader scale analysis.
6. Ongoing workforce deductions in key resource areas.
7. The ongoing Forest Plan revision process that will ultimately affect motorized travel suitability.
8. The Travel Rule (36 CFR 212) and FSM 7710 does not require or specify a scale of analysis and the District has the discretion to set the scope of the analysis.

It is obvious, then, that this is a “just get it done so we can produce/justify the printing of the resulting Motor Vehicle Use Map” approach. This also assumes that some additional process will have to take place at some future date to integrate these “interim” decisions with a broader scale planning process. The context within which this EA and TR implementation is taking place has been with an outdated forest plan, unpublished and largely unavailable and untimely FSM 7700 or coordinated FSM 2300 policy and direction. Our fear that the delegation of authority of this Travel Management process to District Rangers would result in disconnected decisions without cumulative or integrated processes has come true. We are also discouraged and greatly disappointed that this anyway meets community-based, collaborative process as expected by the Department.

The implementation guidelines from the Federal Register (pgs. 68269 and 68271) and the pending, but unavailable FSM 7710/2300 drafts highlight the need to have sustainable, managed systems of motor vehicle routes and areas that address user needs and safety, better economic opportunities for local residents and communities, and minimum environmental impacts. The FSM’s are requiring social, economic and environmental sustainability assessments. These remain undefined, unreferenced, and unused in this document.

The Pagosa Environmental Assessment on the Travel Rule states that it is based on the “Best Available Science” (pg.1). The document, except for the wildlife assessments, is practically void of any application of science. The ID Team is listed, but without any published biographies or credentials (pg. 52). The Literature Cited (pg. 53) has no references to social, economic, recreation, tourism, current use and trend data or the scientific basis for the application the Recreation Opportunity Spectrum. Of the sixteen cited references, 13 are wildlife, 1 about habitat, and 2 are water quality related. NON COVERED OHV RECREATION.

The “Social and Economic” assessment at 3.8 (pg 49), lacks any application of a social assessment or any related social science. The financial and economic efficiency analyses included is a weak effort to include something, but avoids any discussion of public user benefits, travel and tourism impacts, or enhanced community recreation opportunities and impacts on revenues. The document fails in applying or documenting the best available science, as we are only asked to accept “expert opinions” (pg.1). This document is really



nothing more than an expeditious effort to justify designating existing routes within Areas C and D designated by the old Forest Plan and eliminated by an administrative action. While this has been fairly stated by the ID Team, it is far short of what we have anticipated and our community of users demand

The proposed alternatives discuss ATV routes only, with no reference to developing or maintaining single track opportunities, unless that is the six miles of “Special Vehicle Designation” in Table 2 and not mapped. The discussion in the 3.4 Recreation Section shows a loss of “approximately 37 miles of currently-utilized travel ways” within a combined area of 22,395 acres. The discussion follows (pg 31) that there is a loss of 22,395 acres of motorcycle and ATV cross county travel, but no further discussion about maintaining motorcycle, single track opportunities, except those shared with ATV’s. This is contrary to sustaining opportunities and designating routes for specific motorized users in national and regional direction. There is only vague discussion and no display or mapping of changing or retaining ROS classes. There is a mix of Rural- roaded, semi-primitive motorized and non-motorized acres that are affected by alternative and need to be documented.

We do not understand the numbers as displayed in Table 2 (pg 31). The previous discussion suggests the loss of 37 miles of motorized trails from Area C and D. The addition of 18 miles (12 + 6) in a combination of highway vehicles and special vehicles (undefined) is confusing. We understand there is to be .3 miles of new construction under Alternative 2, but the map shows .5 miles. This needs clarification. On page 32, there is a discussion about the District increasing motorized trails from 54 to 72 miles. It seems like if you lose 37 miles and change the designation on 18 miles of already existing motorized roads and trails you can not have or take credit for and increase of 18 miles of motorized use trails. We think there is a confusion about new opportunity and new or replacement trails with new designations of already existing routes.

There are multiple references to a Mixed Use Analysis on Road 622, but no appendix material on how that was completed or criteria used. We share the concern for public safety, but the documentation needs to be included.

We are supportive of sustainable, designated roads and trails and the implementation of a well coordinated transportation system that is responsive to today’s changing recreation use patterns. Public safety, use and enjoyment of public lands are essential to our communities. Communities and their access to diverse and predictable recreation opportunities must also be sustainable.

The spirit of this Travel Rule process is right in order to achieve a more managed recreation environment for outdoor recreation users. However, the Forest Service must step up to their responsibilities for managed recreation by implementing integrated resource planning processes. The Forest Service needs to avoided piece meal approaches



that do not include collaborative community solutions at a scale that can consider cumulative effects and a full range of viable alternatives.

Respectfully submitted

CC:

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