

COHVCO
RESPONSE TO GUNNISON TRAVEL PLAN
August 2007

I. COHVCO and Motorized Recreation

The Organization

The Colorado Off-Highway Vehicle Coalition (COHVCO), represents nearly 200,000 Coloradoans, and thousands of visitors from outside Colorado, who enjoy recreation on public lands with off highway vehicles. COHVCO is a volunteer based, non-profit conservation organization that has focused on preserving and enhancing the opportunities of all off highway vehicle (OHV) users in Colorado since 1987.

COHVCO represents motorcycle, four wheel drive (4WD), all terrain vehicles (ATV), and snow machine enthusiasts. COHVCO, its participation clubs, and enthusiasts provide not only thousands of volunteer hours, but contribute over \$1.5 million each year for public land management and maintenance through Colorado’s OHV Registration Program. See Appendix 1 for a list of COHVCO member clubs.

Since 1992, contributions by motorized recreationists in Colorado to register their equipment have resulted in Registration Program Grants to the Gunnison National Forest of \$1,293,544. See Appendix 3 for project details.

User Demographics

U.S. Census information shows that from 1960 to 2000, the US population grew by 57 percent, while the Colorado population grew by 145 percent. The projection for 2010 shows Colorado nearly tripling the rate of national growth, increasing by 26 percent over 2000 figures, while the US grows by 9.8 percent. By 2030, the US Census anticipates adding another 1.5 million people in Colorado. The need for a coordinated, state-wide transportation system and integrated planning is apparent to accommodate increasing demand.

The OHV Registration Program in Colorado has grown from 55,000 registrations in 2000 to 121,000 registrations in 2006. This is a significant growth rate of 14 percent per year.

Hazen and Howard in their survey: “Economic Contributions of Off-Highway Vehicle Use in Colorado” prepared for COHVCO in July 2001, reported that the total expenditure associated with all types of motorized recreation in Colorado in 2000 was estimated to range from \$486 million to \$519 million. Since the 2000 assessment, and with the population, sales and registration increases since then, the annual Colorado figure is approaching \$1 billion. See the Executive Summary in Appendix 2 for additional details.

Nationally, there have been approximately 750,000 ATV's sold annually for the past three years. In addition, 250,000 off highway motorcycles have been sold each of the past three years. In total, approximately 1,000,000 units per year are sold, with many of them intended for public land use. The rate of vehicle retirement does not come close to these purchases, so we know that the population of units continues to grow.

Scale of the Problem

The opportunity to recreate with motorized vehicles on public lands in Colorado is decreasing.

1. Since the Wilderness Act of 1964, over 3 million acres in Colorado have been closed to motorized and mechanized use under the provisions of wilderness legislation.
2. In the last 20 years, every national forest has gone from open unless closed, to closed unless open (to motorized recreation in many areas). Interim implementation plans have eliminated additional routes.
3. Each Forest Plan, RMP, and Travel Planning action has reduced the amount of OHV routes and opportunities without any regional or national cumulative effects analysis.
4. The current Travel Management Rule (TMR) and change to designated routes by the USFS and BLM, respectively, will further reduce motorized access. To date, only a handful of user created routes have been considered for designation on Colorado's forests.

The Challenge

Colorado and the West are growing 2-3 times faster than the nation as a whole, and OHV use is growing at a rate 10 times the population growth. Many people are substituting motorized recreation for other forms of traditional outdoor recreation activities. Our public land managers need to address these changed conditions and user benefits through a rigorous travel management planning process with NEPA analysis that applies the best science available.

The continued concentration of motorized use on fewer and fewer routes will have and adverse impact on both the natural and human environment. We recognize that the Grand Mesa-Uncompahgre-Gunnison National Forest and its communities is among the "Top 20" in visitor use of National Forests in the country and has been a traditional and historic use area for motorized recreation.

A recent review of the 1931 Gunnison Forest Map found that the Forest was hosting 4,000 annual campers and picnickers, and another 4000 using the roads, and coming from distant places to enjoy the fishing. The visitor was invited to use the many roads, “built along the principle streams, and roads and trails that led to “practically all parts of the forest”. This is an enlightening comparison to the over 3 million visitors that come to the Forest today.

The Gunnison Basin area is still considered a destination for area for national and international visitors who enjoy a diversity of outdoor recreation opportunities.

Summary of Recent Responses and Data Input

The COHVCO and its affiliate organizations have previously provided detailed route and field data, including user generated routes, letters on routes proposed for closure during both this Travel Rule process and the 2001 Gunnison Interim Travel decision process. Letters dated 15 September 2006, and 22 June 2007, sent to the planning office and to the BLM Gunnison Field Office respectively, from the Colorado 500 and COHVCO, and a letter dated 10 July 2007 to Ranger and Field Manager is documentation of our ongoing input and interest to your processes. We understand all previous coordinated input will be included in the preparation of alternatives and the supporting DEIS. See Appendix 4 for copies of the letters referenced.

This responses represent an ongoing interest in providing up-to-date field data for planning and monitoring purposes. Our GPS-based trail data has been developed and coordinated to integrate with the Forest Service’s resource and facilities data and information management systems (INFRA). You have received several reports and maps on user generated routes from local individuals and affiliated club members. We would like to have access to copies of all the submitted user generated routes for our records. We will be contacting you to make the necessary arrangements.

II. Discussion of Concerns on Planning Process

A. The GMUG National Forest Plan of 1983, as amended in 1991 and 1999, is out of date, and not totally responsive to providing direction for integrated recreation management. The Gunnison Interim Travel Plan 2001, while dealing with establishing routes for motorized use to discourage user generated routes, did not deal with vehicle class type or season of use as now required by the Travel Management Rule. In the mean time, we have dealt with separate regional recreation strategies, forest recreation niche management strategies, recreation facility condition surveys, unsettled roadless and wilderness designations, oil and gas assessments, pending Continental Divide National Scenic Trail direction, and a stalled Forest Plan under the 2005 Rule. This multitude of overlapping processes has made an integrated transportation planning process in

accordance with FSM 7700 and policy development extremely difficult to impossible for both the recreation public and the managing agencies.

The challenge to the Planning team under this current process will be to develop a clear statement of “purpose and need” under the provisions of NEPA for this process. The range of alternatives in a process that is allocating resource opportunity areas is clearly a different set of alternatives than just considering the existing base system and producing a motor vehicle use map (MVUM) by 2009.

The 2001 Interim Plan considered historic use routes and user generated routes. The current Preliminary Proposed plan, under the Travel Rule, neglected using user generated road and trail data, and apparently has deferred using user generated road and trail data until some future process. The decision by the Forest to complete a DEIS for the MVUM process, also suggests an evaluation, in part, to potentially amend the Forest Plan or further develop data for the “Comprehensive Evaluation Report under the 2005 Forest Planning Regulations. . . A complete data base to include a user generated road and trail inventory is imperative when needing to meet the requirements of a collaborative public process under the Travel Rule of November 2005 whether this is another interim plan or not.

We feel Transportation Rule planning decisions, now essentially delegated to District Rangers, will potentially lead to uncoordinated route and system planning, with an associated risk of loss of continuity between adjoining districts and forests and neighboring regions. This may lead to unintended consequences that negatively affect resources or user patterns on adjoining units or regions.

Rational for documentation of travel decisions needs to be applied to both open and closed roads and trails. The Travel Management Rule provides the basis for requiring documentation of travel management decisions that either open or close roads, trails or open areas. Therefore, such routes that predate NEPA, are user created or have a long historical use should have documented prohibitions. Further, any responsible official that relies upon previous decisions that designate or prohibit must make sure that such decisions were made with public involvement. See 36 CFR Sections 212.50(b), 212.52(a).

The local planning coordination between the BLM Gunnison Field Office and the Gunnison Ranger District is a local, great practical solution that serves the public well.

B. There are still drafts and amendments to FSM 2300 and FSM 7700 documents not in place that contribute to a confusion of undefined terminology and processes. An example is the lack of definitions for using the concepts of environmental, economic, and social sustainability. These concepts come directly from the 2005 Travel Rule and need definition and implementation direction.

As a consequence, Ranger Districts are potentially making closure decisions based on lack of a federal budget under some application of the economic sustainability guideline.

The Secretary of Agriculture gave direction at page 68281 of the November 9th, 2005 Travel Rule: “The Department does not believe that this scarcity (budget) should lead to blanket closures on NFS lands to recreation users. Volunteers and cooperators can supplement agency resources for maintenance and administration, and their contributions should be considered in this evaluation”.

The current planning process appears to be more about route management for a diversity of uses, and the subsequent publication of a MVUM. The “Preliminary Proposed Transportation System” map prepared for the public meetings did not include any displays of resource team screens considered for the preliminary, no outline or charts of current activities uses or any display of future recreation objectives, outputs or outcomes.

Application of the concept of “social sustainability” implies that there should be a predictable supply of opportunities over time within the ability of the natural resources, and a continuing investment in community social organizations and structures. The process, without an updated Forest Plan and the application of a “social sustainability” process appears contrary and backward to the current recreation planning model. The recreation model, including the use of the “Recreation Opportunity Spectrum”, starts with the development of recreation benefits for the participating publics, includes the suitability and access of appropriate landscapes to support experiences, and then allocates an appropriate transportation system including routes to meet decision objectives. See the suggested planning model below.

Conceptual Recreation/Transportation Planning Model

Step 1

Development of user and Community benefits and outcomes

Step 2

Determine suitability of resources and landscapes >

Step 3

Determine transportation system and route locations And maintenance programs

Social Sustainability + **Environmental Sustainability** + **Economic Sustainability**

A transportation plan must include an analysis of user benefits and a clear acknowledgement of the benefits based concept of recreation as applied to motorized recreation. Examples include the concept of primary, secondary and tertiary use of motorized vehicles. Primary being the vehicle experience as the principle reason for the activity. Secondary involves the vehicle as the means of reaching or obtaining a primary recreational activity. Tertiary is where the vehicle is used for an activity that generates profit incidental to the use of the vehicle.

Appropriate segregation of motorized recreational use is a key to both Rule implementation and user benefits. A socially sustainable system requires consideration

of the interaction among motorized recreationists. For example the constant evolution of single track motorized trails is a direct result of failure to acknowledge the increased use and number of ATVs and correspondingly the various experiences ATV riders wish to engage in when recreating. Many ATV riders find little variety in the difficulty of ATV trails and hence are prone to engage in the use of more technical single track. The Plan must consider such needs.

This “B” concern situation, like concern “A” above, needs the help of a clear “purpose and need” statement to define the intent of the decisions being made in light of an out of date forest plan, and a pending forest plan revisions.

C. The recent “Comprehensive Evaluation Report” prepared under the 2005 Rule for the Grand Mesa, Uncompahgre and Gunnison National Forests identified “condition gaps” in the areas of Dispersed Recreation, ROS, and Travel that included the loss of semi-primitive motorized opportunities on the forest. This has been the result of more designated wilderness and roadless from the semi-primitive spectrum, and more roaded development also from the semi-primitive inventory of opportunities. This proposed travel plan has major implications in resolving this identified gap issue.

Many motorized users are fond of both double and single track semi-primitive trails that not only challenge their riding skills, but put them into contact with nature in a less developed environment. The associated benefits are critical in determining a quality recreation experience. We need to maintain the routes and trails that currently exist and enhance future opportunities in settings that include backcountry alpine and subalpine landscapes. It is not agreeable to be relegated to roaded natural settings only in general forest areas by uses/or users that have come more recently. These more developed settings are not substitutable experiences, would not meet social sustainability criteria, and are not responsive to historical use patterns.

During the total GMUG/GNF TMP planning process, the total available miles for all types of recreation must include the wilderness trail systems. It is our opinion that the majority of wilderness areas are not adequately utilized for non-motorized recreation. This indicates a surplus of non-motorized opportunities rather than a shortfall. Other forests have separated wilderness and non-wilderness non-motorized trails and this does not make sense or seem equitable to us.

III. Presentation of Principles for Route and Trail Selection

COHVCO has used the following principles in the formulation of the motorized recreation transportation system alternative and routes that need to be added.

Note: Specific recommendations follow this section on discussion on principles.

Principles

1. Retain the existing motorized routes as recognized in the 2001 Interim Travel Plan as shown on the “Green to Yellow” map. This retention recognizes the historic trails and road systems, recent visitor use patterns, and is an investment in maintaining a socially sustainable system for motorized access. This includes some user generated routes authorized by the 2001 Interim Travel Plan Decision. This current inventory of available trails is near maximum capacity from current use. Closing more trails will contribute to more resource and user impacts.
2. Economic sustainability of a trail or road system needs to include consideration for volunteer and cooperator resources to help cover maintenance and project administration costs. There should be no road or trail closures without fully evaluating all available resources or combinations of resources to keep them open. The Gunnison Basin agencies have been the recipients of Colorado OHV Registration Grants that are critical to maintaining the trail systems. These grant funds can be reasonably expected to continue as a funding source. See Appendix for a summary grants.
3. Any transportation planning needs to include a set of outcome objectives for each motorized recreation activity type. Route management and ROS can only be applied after objectives are set for what constitutes a set of quality objectives to meet public expectations.
4. Where the agency creates new activities or land classifications that might otherwise displace historic use they have the responsibility to help replace in kind, mitigate or find and collaborate on alternative routes that will continue to support a diversified set of users. An example of this is a potentially successful collaborative process to develop a trail system to accommodate the non-motorized and mechanized objectives of the Continental Divide National Scenic Trail.
5. Travel management decisions that involve the continuity of roads, trails, highways, and tourism issues, across multiple jurisdictions, need regional oversight to assure coordination of goals and objectives. District and Field Office level transportation planning and decision making, without oversight, risks unbalancing travel and tourism opportunities in a regional and national economy. Rangers and local officials can best facilitate planning, evaluate site specific impacts, implement plans and monitor use

6. Additional, developed, multiple-use trail heads will disperse use more quickly into a large backcountry areas, than a few isolated and zoned use trail heads.
7. Allocating semi-primitive motorized and non-motorized uses on areas less than 2500 acres may provide some management options, maintain continuity of travel routes, and help to support the declining acreage base within the available semi-primitive ROS inventory.
8. Motorized recreation enthusiasts share the concern for public road safety, equipment safety, noise, rider skills, education, parental supervision and mixed traffic safety with all travelers, law enforcement and responsible community leaders.
9. Informed motorized recreationists understand and support the need for seasonal and emergency closers to protect soil, water and wildlife resources. Individuals and organizations are always available to help with mitigation and restoration projects and programs.
10. Motorized recreation users and industry groups will actively help collect data, plan, map, and monitor public responses to regulations and laws. They will strongly advocate, respect, and defend all historic and traditional uses. The “Stay the Trail” program for user education and the Colorado Trail Patrol for friendly user enforcement are examples of these cooperative programs.
11. In order to help reduce the use in the Taylor Park area, this alternative is intended to identify routes and areas south of Highway 50, that could be further developed, although the ROS settings are not directly substitutable, they are complimentary.
12. Routes that provide loop trips and a variety of experience classes is extremely important for the enhancement of the motorized recreation experience.