

**May 20, 2010**  
**Comments and Recommendations**  
**Gunnison Basin Federal Lands Travel Management FEIS**  
**COHVCO – TPA - RMEC**

COHVCO, TPA and RMEC wish to compliment and thank the FEIS team for making a number of substantive improvements from the DEIS. Improvements are seen in both the narrative, and route specific analysis. If the same level of improvement occurs between the FEIS and the ROD, we believe you will have developed a solid, sustainable Travel Management Plan. While it will not satisfy all parties, it should provide a good base, which can be enhanced with the addition of several motorized routes that need inclusion, additional work, or review. The following are some of our notes of improvement:

- The FEIS identifies the resultant travel plan as being sustainable. We believe this is both factual, and consistent with the 2005 Travel Management Rule (TMR). We have further comments on Sustainability later in our comments.
- Improvement in use of best available science
- Improved analysis in regards to Threatened and Endangered Species.
- Additional and more balanced reference to use conflicts.
- Importantly, allowing the Crest Trail, Agate Creek, and Lime Creek trail system to remain open to motorized, as it historically has been. There are also a number of other motorized routes that are open on the FEIS Alternate 5 that were not open in the DEIS Preferred Alt.

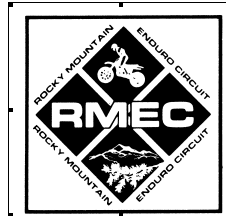
While we still see room for improvement, we concur with Alternative 5 as the Preferred Alternative, even though Alternative 4 offers some additional motorized recreation mileage.

1. Despite the improvements in the FEIS, we believe that there is still significant merit to our comments on the DEIS.

WE HAVE CULLED OUR LIST OF CONCERNS TO THOSE LISTED BELOW, BUT ASK THAT THE PLANNING TEAM RE-READ OUR DEIS COMMENTS, IN PREPARATION OF THE ROD.

2. While significantly improved, the FEIS Summary (page 1), as in the DEIS, still exhibits some bias. The BLM and U.S. Forest Service have a “mandate” to provide for multiple use and sustained yield of all resources...including outdoor recreation ...that best meets the need of American people (Multiple-Use Sustained Yield Act, 16 U.S.C. § 528, and National Forest Management Act, 16 U.S.C. § 1604(e)). By positioning “access needs for a variety of uses” on one end of a planning teeter-totter, against “the mandate for long-term sustainability of natural resources” on the other end, suggests an agency, predetermined, point of balance outside the mandate to also provide for sustainable services for the American people.

One blatant example of bias against motorized use is found on Page 186, “*The conversion of motorized trails to mountain bike trails in the Brush Creek and Cement Creek drainages would alleviate user density and conflict issues reported in this area. The growth in popularity of mountain biking and population growth in Crested Butte*



*South and the Gunnison Basin in general has increased the demand for more non-motorized trails near residential areas that can be accessed quickly and easily and provide short, day-hike/bike opportunities.”* Despite the growth of motorized recreation, no such expansion of opportunity for motorized exists in the FEIS. In fact, many historically motorized routes are closed, decommissioned, or converted to non-motorized use.

Another is located on Page 200, where it states: *“Taken as a whole, there are many more motorized route opportunities in the analysis area compared to designed non-motorized trail opportunities.”* This is blatantly wrong when using the multiple use analysis (everything is open to hikers), and when the Wilderness Area trails and Crested Butte ski area trails are included.

It appears that the FS/BLM has accepted user built mountain bike trails without any EA/EIS actions (Example Ferris Creek area), and further more, listed this as mountain bike only the FEIS. If this is going to be the accepted rationale for trail designation, then it should also extend to the pre-2001 motorized trails that are being closed, and they should be allowed to remain open.

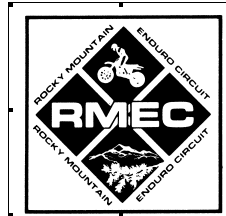
In reviewing the FEIS, it appears that there has been more of a change in the USFS portion of the Plan than on the BLM side. Despite the lengthy TMP process, the BLM now defers some decisions to a future RMP process. We are left to hope that the RMP process results in a more balanced plan for motorized recreation.

**WE ASK THAT RECREATION BE AFFORDED EQUAL STATUS WITH OTHER PUBLIC LAND USES IN THE ROD.**

3. Page 9-10 is incomplete in its answer to “Why Replace the Current Travel Management Direction? The Forest Service Travel Management Rule (November 9, 2005)(“Travel Rule”), clearly **establishes the goal to enhance opportunities for motorized recreation experiences** on National Forest system lands (FR Vol. 70, No. 216, 68264). **This important reason has been omitted in this section of the DEIS and FEIS.** It also established the position of the Department, that “designations of roads and trails... **should be based on accurate, pertinent unbiased information**”. The Department and the Rule did not require independent scientific review, nor supported that it had to be clearly proven to be harmless to the environment for roads and trails to be included (FR Vol. 70, No.216, 68266).

**WE REQUEST THAT THE ROD CLEARLY INCLUDE THE DIRECTIVE TO ENHANCE MOTORIZED RECREATION DESCRIBED IN THE NOVEMBER 2005 TRAVEL RULE.**

4. Page 9-10, Forest Service Travel Management Direction. At the top of Page 10, the 2005 TM Rule is correctly referenced. Yet there is a lack of identification of non-motorized opportunity in Wilderness areas (510 miles of trails) and on the Crested Butte ski area. This omission is significant, as the Travel Management Plan is the only USFS tool that provides for the complete dissemination of this information, as the ‘to be determined’ Forest Plan process will presumably avoid site specific decisions. This omission is further noted on Page 16 in Scope of the Project and Analysis. The recreational experience, including quiet use, solitude and other elements that some non-motorized users value, need to be highlighted, and the total amount of opportunity for this type of recreation quantified. Further, the agencies need to direct people seeking this experience to the 5 Wilderness Areas in the planning area. It is an excuse to state that the Crested Butte trails are covered under the ski area special use permit, as it is still USFS land.



WE ASK THAT WILDERNESS AND SKI AREA TRAVEL OPPORTUNITIES BE ADDRESSED IN ALL SUMMARY INFORMATION ABOUT TRAVEL OPPORTUNITIES.

5. Funding of the road and trails system needs to be addressed more accurately. Since 1994, for example, the Colorado State OHV program has provided over \$1.6 million in grants to the Gunnison Basin area for trail maintenance and trail crews. These grants are summarized in Appendix I of our DEIS comments. The Travel Rule (at FR, Vol. 70, No. 216, 68281) states that “volunteers and cooperators can supplement agency resources for maintenance and administration, and their contribution should be considered in this (TMP) evaluation”.

On page 265, “Occasionally, the opportunity presents itself for grant funding, user-group funding, or volunteered hours for construction or maintenance of particular trail routes.” This is a gross misrepresentation of the consistency and impact of the Colorado State OHV program to the Gunnison Basin. The average grant income per year over the last 10 years is \$150,692. This compares favorably to the \$144,700 annual amount shown in Table 3-61, page 267, for maintaining all USFS and BLM trails under the No Action Alternative.

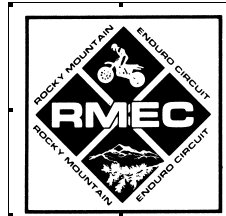
There is a decided difference between grants applied for and received by the BLM and USFS in the Gunnison basin. We are pleased that the new BLM management has embraced the program and has begun applying for grants from this program.

Each Colorado OHV Program Grant for specific trails includes an agreement to maintain the trail for motorized recreation for a period of 20 years. A listing of the Colorado OHV Program Grants is provided in Appendix I of our DEIS comments. It is obvious that a number of the trails that are slated for prohibition from motorized recreation are on this list. Finally, the 2005 Travel Management Rule directs the USFS to look for mitigation opportunities.

In conjunction with the grants analysis, it is important for the ROD to include the latest Economic Impact Data, from the 2009 COHVCO study, which shows motorized recreation to account for \$1 billion of economic impact. All of the pertinent planning team members have received this data, and we will send another copy to Mr. Shellhorn to ensure its inclusion in the ROD.

WE REQUEST THAT THE PLANNING TEAM FAIRLY ACKNOWLEDGE THE OHV PROGRAM GRANTS, AND UNDERTAKE AN EFFORT WITH COHVCO AND TPA TO ADDRESS ANY MOTORIZED ROUTES THAT ARE BEING CONSIDERED FOR PROHIBITION TO MOTORIZED USE DUE TO MAINTENANCE FUNDING. WE THINK THAT THERE ARE OPPORTUNITIES TO MITIGATE THESE ISSUES PRIOR TO DECISIONS IN THE ROD. WE ALSO REQUEST THAT THE ROD BE UPDATED TO INCLUDE THE 2009 ECONOMIC IMPACT DATA.

6. Route Designation. A number of relatively new, user created mountain bike trails were included in the Preferred Alternative near the Crested Butte area. There is an acknowledgement that these trails serve a need. The same is true of all user created motorized trails. This analysis seems to have been lost on many of the motorized routes that are included in our list of site specific trails sited for closure that we would like re-assessed for inclusion in the ROD.



Our DEIS and Scoping comments offered a number of suggested new routes, and none are included.

WE REQUEST THAT ALL USER CREATED MOTORIZED ROUTES BE RECONSIDERED FOR INCLUSION IN THE ROD, WITH THE SAME MINDSET AS THE MOUNTAIN BIKE TRAILS NEAR CRESTED BUTTE.

7. Page 28. Future Demands. It is clear that the Forest Service has failed to meaningfully consider viable alternatives to those formally analyzed in the DEIS and FEIS, as none of the alternatives show an increase in motorized opportunity over the No Action Alternative. NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to the preferred alternative. 40 C.F.R. § 1502.14 (“agencies shall rigorously explore and objectively evaluate all reasonable alternatives.”) The alternatives section is considered the “heart” of the EIS and a NEPA analysis must “explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14. A NEPA analysis is invalidated by “[t]he existence of a viable but unexamined alternative.” *Resources, Ltd. v. Robertson*, 35 F.3d 1300, 1307 (9<sup>th</sup> Cir. 1993).

On Page 45, it is noted that there are 31.4 miles of non-motorized future routes under consideration, and only 1.4 miles of motorized. This mileage is exacerbated when the number of use days is factored in by use type. To be proportional in terms of opportunity, the motorized needs to be 4-10 times as much mileage for equal amounts of recreational value.

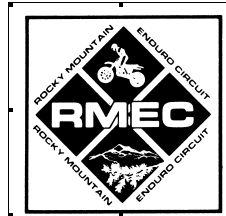
WE RESPECTFULLY ASK YOU TO IDENTIFY AT LEAST 100 MILES OF POTENTIAL FUTURE MOTORIZED OPPORTUNITY.

8. Page 57. Tables 3-1 and 3-2. Miles of Motorized Routes by Erosion Risk Class and in Alpine Areas. These tables shows only motorized routes. Our concerns remain about the lack of science surrounding the impacts of mechanized, foot and horse use, and their lack of disclosure.

WE REQUEST A CORRECTION IN THE ROD, WITH A COMPLETE COMPARISON OF ALL TYPES OF USE BY EROSION RISK AND IN ALPINE AREAS, INCLUDING WILDERNESS AREAS.

9. Pages 111+, Chapter 3, Wildlife-Affected Environment. This section was extensive and based on species specific analysis with a focus on management indicator species (MIS). Bias against motorized travel is again shown, as risks, ratings and habitat effectiveness are all based on motorized road and trail densities. This effort, as with the water, soils, wetlands, and fish sections, is short of analysis and disclosure of the effects of hikers, hunters, mountain bike riders and other non-motorized recreation that tends to stress and impact wildlife. It would seem that some better level of balance in literature reviews and a fuller disclosure of all user impacts would be appropriate here, for reference, go to:

An example of a single focus on just motorized recreation is the proposed closing of the Dr Park/North Bank Trail for bighorn sheep protection. Closing the trail to motorcycles and not dogs, kids, and hikers, is unreasonable. If the CDOW wants to protect the area, it should be closed to all users including closing the North Bank Campground at the west end of the area. We are not aware of any study or



research in this area that documents motorcycle/sheep impacts.

WE REQUEST THAT THE ROD EVALUATE ALL IMPACTS, TO ACHIEVE MORE CONTINUITY AND PARALLELISM BETWEEN ISSUES AND AFFECTS, LITERATURE REVIEWS AND SCIENCE APPLIED. WE FURTHER ASK THAT IF THE DOCTOR PARK/NORTH BANK TRAIL IS CLOSED TO MOTORIZED, THAT 1) IT BE CLOSED TO ALL USES, AND 2) THAT IF THE BIGHORN SHEEP HERD DOESN'T INCREASE BY OVER 20% IN THE NEXT 5 YEARS, THAT THE ROUTE REVERT TO MOTORIZED USE. WE OFFER AN ALTERNATIVE IN OUR SITE SPECIFIC COMMENTS.

10. Page 158. Affected Environment-Recreation on BLM Lands. The loss of 590 miles of road representing 35% of the opportunity for motorized recreation in the Proposed Alternative is a very significant change from historic use opportunities. It is another statistic that should be a part of a more fully disclosed Cumulative Effects analysis. Even though some of these routes were lightly used, they were apart of a unique opportunity for a certain segment of motorized users and hunters.

In addition to the loss of hundreds of miles of road the effect of an area-wide closure of 191,000 acres is another significant change to recreation opportunities. We fully support the objectives of the Gunnison Sage-grouse Conservation Plan (page 119). However, we hope that the monitoring component in this plan will objectively evaluate the buffer areas needed for breeding and nesting requirements. In particular, a 4.0 mile from lek (8 mile diameter) buffer to provide adequate breeding habitat seems on the surface as excessive. We will take a look at the science and management alternatives associated with this Conservation Plan.

WE REQUEST THAT THE ROD REFLECT BOTH A CUMULATIVE EFFECTS ANALYSIS AND A MONITORING COMPONENT THAT ALLOWS FOR A PERIODIC ADJUSTMENT OF THE SEASONAL CLOSURES ON BLM LAND.

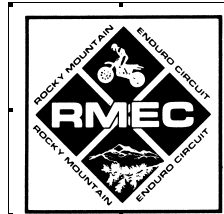
Page 265+. Comparison of Maintenance and Decommissioning Costs. Table 3-61 is a handy chart that gives some good insight into costs. As noted in Item 5 above, the Colorado State OHV Program provides more in grants to the Gunnison Basin than is shown in the maintenance costs of trails.

We are very concerned that there may be budget alternatives, and grant programs that will shift limited resources to decommissioning and restoration programs, and further neglect the maintenance and recapitalization of the designated road and trail systems. A balanced budget strategy by the agencies is critical in this area to both rehab those areas of unacceptable resource damage and to maintain a road and trail system that serves both visitor and resource management needs.

It is our contention that the majority of routes slated for closure have not received any maintenance in the past 5-10 years, and maybe much longer. This is certainly the case for virtually all of the spur routes of short distances. The records of maintenance should be easily obtained and reported.

WE REQUEST THAT:

- 1) THE PLANNING TEAM UNDERTAKE AN EFFORT WITH COHVCO, AND THE TPA TO ADDRESS ANY MOTORIZED ROUTES THAT ARE BEING CONSIDERED FOR



- PROHIBITION TO MOTORIZED USE DUE TO MAINTENANCE/FUNDING, TO PROVIDE AN OPPORTUNITY TO MITIGATE THESE ISSUES PRIOR TO DECISIONS IN THE ROD;
- 2) THAT THE AGENCIES PROVIDE DOCUMENTATION ON THE MAINTENANCE EXPENSES FOR ALL ROUTES PROPOSED FOR CLOSURE IN ANY OF THE ALTERNATIVES
  - 3) THAT NO GRANT APPLICATIONS BE SUBMITTED IN THE FUTURE FOR DECOMMISSIONING.
  - 4) THAT NO DECOMMISSIONING OCCUR ON OUR LIST OF SITE SPECIFIC ROUTES, THEREBY AFFORDING A REASONABLE OPPORTUNITY TO REOPEN THEM, CONSISTENT WITH THE 2005 TM RULE.

11. Multiple Use Analysis. It is important that the public be made fully aware of the nature and quantity of multiple use routes. We submit the following as an example:

TABLE 1, AVAILABLE TRAIL MILEAGE BY RECREATION TYPE, WITH WILDERNESS

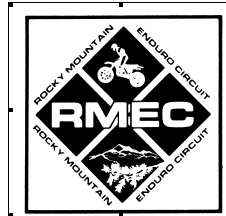
		Existing (1)	Preferred (2)	Alt. 3	Alt. 4
	Sum	1429.58	1429.58	1429.58	1429.58
ATV	ATV	164.94	164.94	164.94	164.94
Motorcycle	MO	501.77	341.11	217.18	426.38
Mountain Bike	MB	586.08	472.35	375.82	622.75
Horse **	HO	1863.94	1783.74	1737.42	1861.28
Foot **	F	1872.71	1792.51	1743.6	1870.05

\*\* includes the 'unmanaged recreation' routes AND Wilderness routes

This highlights the restrictive nature of the Travel Management Plan on motorized recreation, and how much more trail mileage is available to non-motorized recreation forms. The impact needs to be taken into context of how many miles per day these types of users travel. As an example, it becomes clear that ATV's get about 3 days of opportunity (50 miles/day), while motorcycles get about 5 days of opportunity (100 miles/day), mountain bikes get about 24 days (25 miles/day), horses get about 65 days of opportunity (20 miles/day), while foot travelers get about 130 days of opportunity (10 miles/day). When the 510 miles of Wilderness trails are included, equestrian recreationists get over 90 days of opportunity and hikers get between 180-190 days of opportunity!

The point of this exercise is to remind the authors that additional mileage is warranted for motorized recreation, based on equitable need, financial support through grants and volunteer efforts. The continual decline in available trail mileage continues to show a bias against motorized recreation. It also results in concentrated use on the remaining routes, which provides fodder for the restrictive use groups to object to trail impact. Greater dispersion would result in less impact and happier recreationists.

WE REQUEST THAT AN ANALYSIS IDENTICAL TO, OR VERY SIMILAR TO THIS BE INCLUDED IN THE ROD.

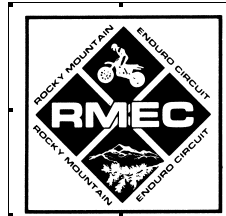


12. We identified several inconsistencies in the terminology regarding the 300' exception for dispersed camping, with some being 300' corridor, and some 300' from the route. We applaud the use of the exception, and ask that it be clarified as 300' from the route (600' corridor).

13. The 2005 Travel Management Rule has explicit language allowing for further review and study, confirming that closure decisions are not the last look. We request that this language be included in the ROD.

14. Route Summary & Site Specific Comments. We acknowledge and thank the planning team for accommodating some of our critical routes in the development of Alternative 5. We consider the following routes to be the most critical to be open for motorized access:

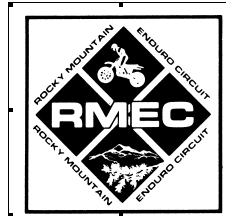
- All motorized routes that are shown as open in Alternative 5 of the FEIS
- Eyre Basin**
- Star Trail connector to Spring Creek, UT-8283
- Grassy, 562
- Waterfall Trail
- Crystal Peak
- Reno Ridge
- April Gulch – Beaver Creek**
- Ferris Creek – Strand trail systems
- Matchless Mountain**
- Lower Doctor Park to North Bank Campground**
- Spur Trail and connectors (some shown closed)
- Trails 559 and 560
- Route 243.3E and 243.3C
- 584.1A provides non-motorized access to the historic Enterprise Mine
- 410.0A
- 580
- 878
- 465/472
- 538 to 913
- 677.3 and 677.3C
- 461
- Sawtooth Trail System, per Item 25, Appendix IV
  - a. County Road (Vulcan Rd) connect to FS trails 806 and 807, to County Rd. 149
- East – West Corridor FS 4WD 807 to BLM West Roads
- FS 4WD 808 to FS 4WD 821
- Gulch. Route 858 to 858.1 to Ohio Pass Road
- Low Line Trail Area 438 to BLM 818 (concern of illegal Wilderness buffer)
- 807 to 559
- 854 to 806
- Unnamed trail E. of Pearl Pass, past Friends Hut



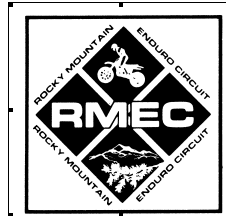
## Site Specific Comments

- Eyre Basin. Our team has had numerous discussions with the planning team on this route. The latest discussion resulted in us being told that keeping this open was incompatible with the 1983 Forest Plan. However, a review of the 1983 Forest Plan [http://www.fs.fed.us/r2/gmug/policy/plan\\_rev/current\\_plan/499.pdf](http://www.fs.fed.us/r2/gmug/policy/plan_rev/current_plan/499.pdf), shows this area to fall within category 2A, and possibly a small area of category 7A and 7E, WHICH ALL INCLUDE SEMI-PRIMITIVE MOTORIZED RECREATION. This trail is admittedly low use, high difficulty, and should be considered for downhill only use. The difficulty level is an important part of the ROS. Since the South end of the trail originates on private property, we have secured assurance that the land owner is open to a limited easement, if the USFS will ask for it, which it hasn't. We will facilitate this discussion!
- #2 Doctor's Park. Closure of this area based upon non scientific facts is not correct. If the DOW is concerned about the sheep herd declining in this area, then we suggest THAT ALL ACCESS BE DENIED, WITH CLOSURE OF THE ENTIRE North Bank public area. Hikers, dogs, and mtn bike use of this area have far more adverse impact on the sheep herd. In fact, disease and bacteria carried by dogs and the open range aspect of historic cattle grazing should be evaluated as to the cause of the declining sheep herd. The motorized community should not be penalized from unfounded theories. There are university studies that show that limited motorized use does not affect wild animals... (See report), and that hikers, dogs, etc cause more of an adverse effect on wildlife. In addition significant amount of \$\$ and labor have been spent by the motorized community to make the trail what it is today.
  - WE SUGGEST THE FOLLOWING FOR THE DOCTOR PARK TRAIL:
    - All motorized and mtn bike traffic should be listed as down hill only. Implement a seasonal closure that coincides with the sheep herd breeding and calving season.
    - Hikers should be educated to not get off the established trail.
    - Dogs should not be allowed.
    - The open cattle grazing in the area should be curtailed.
  - Making the motorized community bear the entire burden for the sheep problem is not correct or fair. This needs to be a binary decision – all or none!
- The Northeast side of the Teocalli ridge has an existing old 4wd road now trail. The FEIS map does not show this current road/trail. We suggest this remain open for all use, in that it will reduce some of the traffic on trails #554/557. The mtn bike community and the motorized community use this trail when using the Pearl pass route.
- Antelope Creek/Land End areas. The current FEIS map shows this trail as being decommissioned. This trail (an old 4wd road) has been maintained by the motorized community for over 30 years. It is used by both mtn bike and motorized as an alternative to the jeep road (818). In fact in the last few years the FS has recognized this trail as open to motorized use by signage and trail designation. We suggest that this short trail remain open for all user groups. The only other access is by the 4wd road that is heavily used by jeeps/trucks. If there is an ES issue in this area, bridges can be built to reduce the impact of stream crossings...the same that is being done in the Pike NF.





- Beaver Creek, FS trail # 447. The closure of this trail is of significant interest to the motorized community. This trail is the only single track access off the Lands end area. The lands end area at one time was a primitive 4wd road area, however extensive logging action has taken this area and turned it into a road area that any car can travel over. The old 4wd roads were decommissioned and the smooth logging road was allowed to remain. We think this was a significant mistake on the part of the land managers. Regardless of history of the road, the Beaver creek trail has been maintained by members of COHVCO and the TPA for 35 years. The issue of closing it now due to the State Parks land at the end should be totally reevaluated. There are 2 streams crossing involved...one at bottom of April Gulch and the other at the end of the trail as it approaches the state owned lands. If the criteria for closure to motorized use are the stream crossings...all user groups have the same problem, whether it is horse, or mtn bikes. The impact on the existing fish population is the same. Any time you cross a stream potential damage can occur. The motorized community requests that this area be re evaluated considering the following proposals. And be allowed to remain open.
  - A rustic bridge can be built at the end of the trail to cross over Beaver Creek to the west side. Funding for this will could be by OHV state grant or the OHV community will fund the building of the bridge thru all ready existing funds.
  - A second alternative would be the opening of an existing trail to the east thru BLM land. This trail is in existence today. With minor work this trail could be made available to all user groups. The history of accepting user built trails has already been implemented by the FS in the Ferris Creek area. If the FS/BLM accepted user built trails in one area into the FEIS, then the Beaver Creek exit to the land end road should also be accepted.
- The area south of HWY 50 included a number of our suggested OHV routes. The BLM and FS chose not to adopt any of the suggested OHV route changes (all were 4wd suggestions listed in the DEIS comments). We request that they be reconsidered as follows:
  - Connect BLM route to FS 4wd #806. Making a sustainable N S connection.
  - Connect FS roads 789.2B to FS 775 to FS 854.2A..Making a sustainable route and not dead end routes as our currently depicted on the FEIS map.
- We reviewed the need for the ‘burn trail’, which parallels the Taylor River from approximately Dinner Station Campground to Rocky Brook Road (Spring Creek Res. Rd) with the planning team. This single track trail allows users to avoid the busy, and often times dangerously dusty, Taylor Park Road. The trail is nearly flat and easy to ride, with a minor climb on the North end at the road, which acts as an ATV barrier currently. We ask that this route be included in the ROD.



### Summary

We have enumerated thirteen points of weakness or failure in the FEIS, as well as noting a number of significant improvements in the FEIS. We also noted other improvements and suggestions in a recent meeting with the Planning Team. We ask that the planning team review our DEIS comments, which remain largely valid as well.

Every USFS and BLM Forest Plan, Resource Management Plan, and Travel Plan that we have studied and participated in throughout the Rocky Mountain region, have had a reduction of motorized opportunity, and this one is headed that direction. It is wrong in terms of visitor demand, increasing population, and historical use. The continued failure of the agencies to accommodate motorized use, while doing so for mountain bikes, with a lack of comparative scientifically based impacts, reflects the bias that we have noted repeatedly. We ask that this bias be eliminated, and motorized recreation opportunity be maintained or enhanced from the No Action Alternative level.

We feel that Alternative 5, the Preferred Alternative, is viable for this Travel Plan, WITH our noted changes, and inclusion of additional mileage. We offer to continue to work with the planning and recreation teams to come up with an alternative that is not punitive to the motorized recreation community, takes into account the issues we have raised, and utilizes multiple use and mitigation as primary tools, rather than last resort efforts. We appreciate that our scoping comments, our DEIS comments, and the numerous meetings we have held with the agencies have had a positive impact, and we hope to work together to come up with a workable plan in the final ROD.

Respectfully submitted by,

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on behalf of himself, Don Riggle and Glenn Graham