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### **Executive Summary of BLM's Colorado River Valley Office Proposed Resource Management Plan.**

The Colorado River Valley Office (“CRVO”) of the BLM located in Glenwood Springs, CO has released the proposed Resource Management Plan (“RMP”) for the office and is looking for public comment by January 17, 2012. The RMP proposes to:

1. Eliminate all cross-country travel currently allowed on 123,000 acres;
2. Decrease designated route mileage for full-size vehicles from 760 miles to 470 miles;
3. Decrease designated route mileage for ATVs from 82 miles to 62 miles;
4. Decrease designated single-track route mileage for motorcycles from 85 miles to 66 miles;
5. Close an additional 47,900 acres to open snowmobile recreation; and
6. Close snowmobile usage on anything other than a trail on an additional 14,800 acres.

While all forms of motorized recreation are to be significantly restricted (35% loss), non-motorized usage expands to:

1. Increase mileage for mechanized/ non motorized from 180 miles to 220 miles; and
2. Increase mileage for foot/horse traffic from 160 to 420 miles.

The Organizations have to question why the supply for non-motorized trails is being expanded, when current supply for these resources exceeds user demand.

Alternative D is the best alternative for OHV recreation but this Alternative fails to address usage trends on the Office and fails to provide a viable plan for realistic management of the lands

over the expected life of the RMP. The RMP could be outdated at the time the final decision document is released. COHVCO and TPA are opposed to Alternative C as the Alternative lacks scientific basis and violates both state and federal planning guidelines.

**COHVCO and TPA's concerns are:**

1. The RMP provides a large amount of information regarding uses which are very disorganized and hard to review. The lack of basic organization will limit the amount and effectiveness of public comment provided, which will result in oversights and inaccuracies in the RMP which will not be discovered until such a time when the remedy for the issue will be far more difficult to implement. The Organizations believe that combining travel management and resource management plans are simply not a viable management tool, and these issues should be addressed separately. There is simply too much information to be analyzed under a combined plan.
2. The economic impact of the proposed closures in the travel management portion of the RMP has been overlooked, such as examination of the economic impact of closing approximately 50% of the motorized routes on the planning area. A lack of access has already been identified as a hunting management issue on the CRVO, and closing 40% of routes will clearly impact many uses outside motorized recreation. The RMP asserts that closing 40% of the motorized trails will result in no negative economic impacts to Colorado communities. This simply is not correct.
3. The poor level of basic organization is also reflected by the fact that route related information provided in various maps in the RMP often fails to accurately reflect motorized routes that are accurately represented in the Travel Management Zone Specific maps in the RMP. Many of the documents alleged cited as authority for provisions in the RMP, are not accurately summarized in the RMP when the underlying authority is reviewed.
4. The lack of organization in the presentation of the information in the RMP is directly evidenced in the discussions regarding Wilderness characteristics areas and Areas of Critical Environmental Concern ("ACEC") designations which are completely inconsistent or conflicting throughout the RMP. BLM guidelines specifically require that ACEC designations are not a substitute for Wilderness Characteristics designations and that definitions of the differences are critical to the planning process. However the RMP proposes to change existing ACEC areas to Wilderness Characteristics areas without any discussion of why the change is necessary, and often the specific Alternative under which an area is to be designated under a particular standard is conflicting when various sections of the RMP are compared.
5. The Organizations have encountered a significant number of people who have submitted comments electronically that have been returned for a wide range of technology related reasons with the BLM office. These database related issues will compound basic issues with the RMP.

These database issues are simply bad management and will be a significant hurdle to any public support for the RMP.

6. While the initial closures proposed in the RMP are painful for the OHV community, many of the standards and guidelines proposed lay the groundwork for significantly more closures in the future, if area specific travel management plans are developed to address site specific issues. The issue specific travel management standards (ie big game habitat, lynx and sage grouse habitat) are often not supported by scientific research and often directly conflict with regional management guidelines for the species. The RMP standards almost always seek to exclude motorized access.

7. The RMP moves to a fully designated trail system for all users but the benefits of the designated trail system change simply are not addressed. The RMP does not analyze why the habitat protection of a designated trail system is not sufficient to achieve RMP objectives and why the RMP finds further closures are necessary, when most habitat management plans identify a designated OHV trail system as the single biggest step towards protecting habitat.

8. The CRVO RMP analysis of the four travel management alternatives addressing the 504,910 acres in the CRVO is significantly smaller than most decision documents for travel management plans issued for areas that are less than 1/10 the size of the CRVO planning area.

9. Motorized users are the only negatively impacted organization in the RMP, as motorized travel management tools are the first tool used to address management issues that have nothing to do with travel management, like big game hunting issues and cave management. This lack of analysis for travel management related issues is a violation of NEPA's requirements for a detailed statement of high quality information of why decisions in the Plan have been made. If the required NEPA analysis had been undertaken, the fallacy of these positions would have been revealed to the persons who developed the RMP.

10. The Plan make a blanket decision to allow all motorized trails that are closed to remain open to all other forms of transportation. The impact of this decision is not analyzed or supported by any scientific authority. Research indicates this proposal is not an effective management tool as many of management concerns are simply not addressed with the removal of motorized recreation.

11. The RMP proposes significant number of standards that seeks to manage concerns in absolute terms, and fail to provide any flexibility to address multiple usage concerns that might conflict with the management standard. An example of this lack of flexibility is the proposed standard to "optimize big game habitat". This standard is of significant concern as most of the planning office is mule deer habitat and optimizing this habitat would require removal of any use that could impact the mule deer, such as inadvertent striking of deer by motor vehicles on arterial roads.

12. The Travel Management plan proposed simply does not reflect current usage levels or future usage projections developed in the numerous state planning documents which must be reviewed and incorporated in federal public lands management. The failure to accurately address demands on the CRVO going forward will result in a plan that rapidly loses utility for on the ground management.

13. The scope of user conflicts is often overstated in the RMP in an attempt to obtain closures of areas to motorized for other reasons. Most user conflicts cannot be addressed with closures of trails and roads as the conflict has nothing to do with a personal contact between users but has a significant social component, which can only be addressed with education of users.

14. The RMP proposes to remove existing area designations designed to protect motorized recreation without addressing why the designations were originally made. The proposed removal of the Gypsum Hills SRMA area violates the reasoning for its original creation, as the SRMA was created to off-set the impacts of the two Wilderness Study Areas (“WSA’s”) in the area . The WSA are still present and the SRMA should not be removed until there is a proposal for removal of the WSAs.


15. The RMP also proposes route closures that conflict with designation of the area after implementation of the RMP. The Hardscrabble Area is to be specifically designated for targeted recreational motorsports activities under the RMP, but the RMP also seeks to close almost all motorized routes in the Hardscrabble Area. This is not only inconsistent but it is also verging on offensive. The RMP fails to give any analysis of the existing motorized opportunities that will be lost in the Hardscrabble area.



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