



April 16, 2014

Scott Fitzwilliams, WRFNF Supervisor  
Att: John Thompson, Nat Resource Specialist  
620 Main Street  
Carbondale, CO 81623-0309

RE: Basalt to Gypsum Motorized Singletrack

Dear Mr Thompson;

Please accept this correspondence as the comments of the Organizations vigorously supporting the above Proposal. Prior to addressing the specific merits of the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

The Trail Preservation Alliance ("TPA") is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. For purposes of these comments, COHVCO and TPA will be referred to as "the Organizations".

The Organizations vigorously support the above proposal, as the construction and adoption of these single track routes will help address a critical shortage of motorized single track trails in the White River National Forest. The benefits to the motorized community are expanded beyond the scope of the current proposal, as the proposal ties two existing trail networks

together and creates significant loop opportunities between the trail networks that currently do not exist. In addition to the proposal addressing this shortage, the project also provides significant opportunities for multiple use recreation with the development of parking facilities to mitigate possible impacts of all recreational usage of the area. Further resource protection is obtained with the project mitigating many routes and other resource issues that currently exist on the ground in the planning area as part of this proposal.

The Organizations are very aware that there is considerable opposition to the project despite the significant benefits to all users and mitigation of existing resource issues in the area. This opposition manifested itself in the grant application process with the Colorado State Parks and Wildlife OHV Grant proposal. While the Organizations did not participate in the on-site visits discussed below, the Organizations were involved in resolving concerns surrounding the grant as the process by which the Basalt to Gypsum trail grant was removed from the other motorized grants of that year was very concerning for the Organizations. The Organizations vigorously assert that opposition to the Proposal had more to do with an ideological opposition to the construction of motorized trails in the area rather than specific concerns about the proposal.

The ideological opposition to the grant proposal resulted in an on-site inspection of the proposal area by CPW recreation staff, USFS representatives, USFWS biologists, and CPW biologists and wildlife managers. After the on-site review of the grant proposal, managers and experts all agreed that there were significant benefits to all usages and improvements to wildlife habitats and other resource issues from the project. These determinations were based on the managers expert opinions and application of best available science for management of species and other issues. The Organizations believe that best available science must again be relied on in addressing these alleged issues as part of the NEPA process and the previous determinations of the resource managers with regard to the grant application must be given heavy weight in the NEPA process.

The Organizations concerns regarding incorporation of previous analysis of the grant proposal are based on the failure of the scoping notice to provide meaningful discussion of these meetings and that the scoping notice now specifically identifies many of the same resource issues as part of the "Effects and Issues to Consider" portions of the scoping notice as were addressed in the grant proposal meetings. While the Organizations understand that NEPA must be an impartial process, the Organizations believe a full representation of the history of the project should be addressed in the scoping and is highly relevant to the NEPA process. The Organizations believe a full representation of the project history would have resulted in issues and possible impacts being addressed in a more balanced manner, especially when considering the motorized community is partnering to resolve impacts from multiple usage of the area

previously. The Organizations are concerned that highlighting all the potential impacts of the project without also identifying benefits to the community and resources that will clearly result may expand opposition to the project based on issues and concerns that have truly already been addressed and resolved in the grant process. Creating opposition to the project based on issues that have already been resolved should be avoided.

The Organizations are also concerned that the Proposal is the result of the partnership of Ranger District staff and local user groups. These partnerships are highly valued by the user groups that have participated in the planning process, but many recreational users are opposed to these type of collaborations for a variety of reasons, mainly based on a distrust of land managers and the position that user groups should fight with land managers rather than partner with them. While overly resource protective provisions in the scoping notice may appease those opposed to the proposal, these same provisions are also relied on by those that oppose collaborative partnerships as proof that the agency is not truly partnering with the user groups. While the Organizations do not share these users perspectives, fueling these beliefs does not work towards addressing these erroneous concerns moving forward.

The Organizations vigorously support the Proposal, as the proposal will address a critical shortage of recreational opportunities that currently exists on the White River National Forest and mitigates many existing issues regarding resources in the proposal area. If you have questions please feel free to contact Scott Jones at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810.

Sincerely,



D.E. Riggle  
Director of Operations  
Trails Preservation Alliance

Scott Jones, Esq.  
COHVCO Authorized Representative  
TPA Authorized Representative



John Bonngiovanni  
COHVCO Chairman