



March 29, 2016

Sheep Mountain Management Project
Attn: Josh Voorhis, District Ranger
South Park District Ranger
PO Box 219
Fairplay, CO 80440

RE: Sheep Mountain Management Project

Dear Ranger Voorhis and Mr. Carlson:

Please accept these comments regarding the Sheep Mountain Management Project on behalf of the Trails Preservation Alliance ("TPA"), the Colorado Off-Highway Vehicle Coalition ("COHVCO") and the Colorado Motorcycle Trail Riders Association (CMTRA). The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding and multi-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to insure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multi-use recreational opportunities. COHVCO is a grassroots advocacy organization representing approximately 150,000 registered off-highway vehicle ("OHV") users in Colorado seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of multi-use and 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. CMTRA has been active in trail maintenance of Colorado motorcycle trails in the Pikes Peak and Southern Colorado region for over 45 years. This club of motorcycle enthusiasts actively works with the US Forest Service and the Bureau of Land Management to help maintain multi-use and single track trails open and accessible for public use. CMTRA represents a membership of over 100 local riders. TPA, COHVCO and CMTRA are referred to collectively in this correspondence as "The Organizations." The Organizations offer the following comments, values and concerns regarding this plan update.

1. The economic impacts of multi-use and motorized recreation within the South Park Ranger District cannot be overlooked and is certainly important to Park County and the surrounding

communities. Significant economic benefits are realized by the nearby communities especially Fairplay when considering recreation in the Sheep Mountain area. As popular as recreational areas are within the District like the Sheep Mountain area, the economic benefits of these areas to the local economies of the surrounding communities should not be undervalued.

2. With few if any exceptions, the roads and trails within the South Park Ranger District and the Pike & San Isabel National Forest have been in existence and providing public benefits for decades. History has shown that these routes provide a level of tangible recreational, economic and/or forest access value. Continuing to have an adequate network of forest roads and trails will be truly beneficial and necessary in providing sufficient access for future timber management, continuing forest visits, recreation, emergency access/egress, etc.
3. Below are specific comments relating to Roads and Trails within the Sheep Mountain project area (*Refer to the USFS Sheep Mountain Management Project Proposal Map*):
 - a. The Sheep Mountain area and its associated system of trails is the closest multi-use trail system to Fairplay and offers a wide variety of multi-use and OHV recreational experiences within a relatively compact area. Multi-use access to the campground is a terrific amenity and increases the attractiveness of the Sheep Mountain trail system.
 - b. **NFST 691** is a true Colorado treasure and one of the truly outstanding single track trails in the South Park Ranger District. It is an extremely stunning trail with rock obstacles, exposure, high elevations, and a scree field crossing which offers a very rare challenge. The level of difficulty of this route is important to offer to the OHV community so enthusiasts don't feel like they need to create their own challenges, such as non-system hill climbs. The Northeast trailhead for NFST 691 connects to the back of Horseshoe campground. This requires users to travel through the campground to access the trail. If a reroute could be put in place to keep trail users out of the campground it would make for a more pleasant experience for the campers. Some older maps show a two track trail running just west of the campground that connects NFST 691 to NFST 689. If this trail still exists it may be an easy opportunity to divert trail traffic around the campground. The southern trailhead for NFST 691 is very difficult to find due to an existing non-system road and a hard-to-find trailhead with no trail markers delineating the route. The only way to accurately find this trailhead is to first ride NFST 691 in the opposite direction, then when users emerge at the other end, they now know where the trailhead is. It would help to decommission the short, dead-end, non-system road and add trail signage to the NFST 691 trailhead. NFST 691 is listed as single track on the Motor Vehicle Use Map (MUVU), but like many of the trails in this area, it is frequently used by ATVs. Most of this trail west of the NFST 740 intersection is above tree line on a highly exposed section of the mountain. This section is off-camber two-track for approximately ½ mile until the route encounters an old mine site. The

exposure and off-camper nature of this trail makes it dangerous for ATVs which are not able to turn around until they get all the way to the mine. We believe it would be in everyone's best interest to have a single track restrictor gate at this intersection to keep ATVs off the western section of this trail. There are some very steep rocky sections on NFST 691 east of the NFST 740 intersection. These are very challenging sections which are entrenched sections of trail. The topsoil is sparse exposing large rocks in the trail. Erosion over the years has created banks on the side of the trail which are tall enough to encourage users to remain on the trail. We would recommend that these sections stay as they are since they are already somewhat entrenched and the high banks act as a barrier to keep users on the trail. These sections lets users know the difficulty of the trail before they get too high on the mountain.

- c. **NFST 739** is a pleasant, sustainable trail which accesses ruins of old cabins, offers pleasant views of the valley, and creates a nice loop opportunity for trail users. We would recommend keeping this trail as is.
 - d. **NFST 689 and NFST 660** are very pleasant, moderately easy, sustainable trails which wind through dense woods and small open meadows. These trails offer an excellent recreational experience for younger riders and users who are not looking for the challenge that NFST 691 offers. Many of our members have camped at Horseshoe Campground and it makes a terrific opportunity to take children and beginners on short rides on these trails. Both of these trails are listed as single track on the MVUMs, but the signage at the trailheads show they are open to ATVs and ATVs use these trails frequently. All of these trails are functionally 50" wide. We would recommend consideration of converting the designation for this trail as open to vehicles 50" or less in width (i.e. ATV trail).
 - e. **NFSR 178 and NFSR 179** are very similar in nature to NFST689 and NFST660. They are very pleasant trails for family rides and, combined with NFST689 and NFST660, they create nice opportunities for loop rides of varying distances.
 - f. **NFST 740** is a wonderful trail which creates a great loop of a moderately challenging level. As with other trails in the area, it is listed as a single track on the MVUM, but is signed otherwise on the trail signage. We would recommend consideration of converting the designation for this trail as open to vehicles 50" or less in width (i.e. ATV trail).
4. We feel it is important to spotlight the following general principles regarding multi-use recreation and are important considerations when evaluating any modifications to the Sheep Mountain Area¹:

¹ Management Guidelines for OHV Recreation, National Off-Highway Vehicle Conservation Council, 2006

- a. Generally forest visitors participating in multi-use activities will use routes that exist and adequately satisfy their needs and desires.
 - b. Non-system trails and roads should be reviewed during this review process to determine if any of these non-system routes will fulfill a valid multi-use need and can be altered to meet recreation and resource management considerations.
 - c. Route networks and multi-use trail systems should meet local needs, provide the desired recreational opportunities and offer a quality experience. We are not asking that this be done at the expense of other important concerns, but a system of routes that does not meet user needs will not be used properly and will not be supported by the users. Occurrences of off-route use, other management issues and enforcement problems will likely increase when the routes and trails do not provide an appropriate and enjoyable opportunity.
 - d. Recreational enthusiasts look for variety in their various pursuits. For multi-use, to include motorized/OHV users, this means looped routes. An in-and-out route may be satisfactory if the destination is so desirable that it overshadows the fact that forest visitors must use the same route in both directions. However, even in these cases, loop systems will always provide better experiences.
5. We acknowledge that the South Park Ranger District may have struggled somewhat with the use of non-system trails by ALL users throughout the Forest. However, we feel much of this stems from an increasing need and demand for multi-use recreational opportunities on public lands in general. As the State of Colorado's population has grown, so have the sales of OHV's, bicycles, hiking equipment, camping units and other forms of outdoor recreation increasing the demand for recreation sites within the Pike & San Isabel National Forest. We would offer that much of the increase in illegal user-created routes, braided routes & trails and unauthorized group campsites are a result and reflection of inadequately meeting the needs and demands of the public and the recreational users who choose these areas. An adequate and varied inventory of routes and trails that fulfills the user's spectrum of needs for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved compliance and less off route travel. Closure and reduction of recreational opportunities and the resulting concentration of the ever increasing number of users, has shown again and again that the desired results are not obtained.
6. The Organizations are aware of demands regarding a perceived inadequacy of the USFS to provide enforcement of regulations pertaining to multi-use and motorized recreation in particular. We would challenge that based upon several studies, pilot projects, etc. by the Colorado Parks and Wildlife Division, the USFS and the BLM to analyze if indeed an enforcement issue exists, and without exception, those projects have shown there are no problems due to a

lack of enforcement. The State of Colorado's OHV funds have been used to subsidize law enforcement programs and the detailing of law enforcement officers to OHV areas only to come back with consistent results that this cry for the need for enforcement is unfounded, unsubstantiated and just plain inaccurate. In 2011, the Colorado Parks and Wildlife Division initiated an OHV Law Enforcement Pilot program to address the accusations, questions and concerns raised by critics of OHV recreation on public lands in Colorado. The data and observations gathered from this Pilot program in 2011, 2012, and 2103 repeatedly demonstrated excellent compliance with OHV rules and regulations throughout Colorado by OHV users. It was estimated that over 10,000 individual OHV users were stopped and inspected during the Pilot Program and 94% of those users were found to be fully compliant with Colorado OHV laws and regulations.²

7. Sound. Motorized and non-motorized uses are equally legitimate uses of public lands and especially on USFS roads and multi-use/motorized trails. Sound from motorized use is to be expected in areas open to motorized use. The Organizations would offer that the State of Colorado already has strict standards for any and all sound emanating from OHV's. This very detailed standard has proven to be effective since 2006 and governs vehicles produced as far back as 1971. OHV users themselves have funded efforts to educate, test and "police" themselves for sound level compliance. We feel that complaints of noise and demands for sound reduction are once again unfounded and will often be used as a selfish excuse to try and reduce or eliminate motorized access and use of public lands.
8. As future Proactive and Adaptive Management Plans are considered to try and achieve a particular desired condition or end state, these Plans should include thresholds and triggering mechanisms that allow for the expansion and adding of recreational opportunities, not just curtailment, restrictions and eliminations of opportunities. If desired conditions are not being achieved or monitoring protocols are not rendering the preferred results, consideration should be given that perhaps the needs and demands of the users are not being adequately provided for. One example might be off trail use or use of closed routes. Rather than assuming this is merely caused by a minority of users ignoring the rules, this may indeed be an indicator that the existing network does not adequately meet the user group's spectrum of needs for a route to a particular destination, level or degree of challenge, route length, etc.
9. In general, the Organizations do not support the segregation of users and the exclusive use of one user group at the exclusion of others. We feel it is both socially beneficial and desirable for all users to learn to coexist and to show tolerance and respect for other users and groups of users. Just as we all learn to live together in our daily lives away from the forest, we should also

² The 2014 Off-Highway Vehicle Law Enforcement & Field Presence Program, Colorado Parks and Wildlife Division, March 2014

extend that willingness to coexist when in the forest. Segregated user groups only fosters arrogance, elitism, intolerance and eventually leads to unjustified stereotyping and discrimination and there is limited documentation at best regarding user conflicts.

10. We feel it may be necessary for this project to consider providing opportunities that will not restrict the changes and development of new technologies such as hybrid bikes, electric bikes/motorcycles, personal mobility devices just to name a few.

We thank you for reviewing and considering these comments and suggestions. The Organizations would welcome a discussion of these opportunities at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell 719-338-4106

Sincerely,



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