



October 23, 2016

BLM Monticello Field Office
Attn: Recreation Program (Recapture ROW)
P.O. Box 7
Monticello, UT 84535

Re: Recapture Canyon Right-of-Way

Dear Sirs:

Please accept this correspondence as the comments in favor of Alternative 2 of the Environmental Assessment regarding the Recapture Canyon Right of Way ("the Proposal") . The Organizations believe that this Proposal would be a significant step towards resolving the socially based user conflicts that have plagued the management of this area since closures were instituted to protect cultural resources in this area. This release would also increase protection and appreciation of cultural resources by expanding funding and partners for education of all users of the area of the significance and unique opportunities to access these areas and increase awareness and value of these resources.

As recently noted in numerous newspaper articles, closure of the Recapture Canyon trail to motorized usage has not impacted the rate of damage to cultural resources in the area but has contributed to ugly accelerations of user conflicts in the area.¹ The Organizations believe that the proper management and education of users will allow these cultural resources to be more fully understood and appreciated by visitors to the area and foster a greater appreciation of the cultural history in the area and appreciation for the public lands on which these resources are located. Education would further avoid escalation of socially based user conflicts beyond the current levels, that are not acceptable to the Organizations.

The Organizations believe a brief description of each Organization will assist in understanding of these comments. COHVCO is a grassroots advocacy organization representing the

¹ See, Durango Herald; January 10, 2014; *Recapture Canyon: An illegal ATV trail stirs up a cloud of controversy.*

approximately 200,000 registered OHVs in Colorado 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.

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 for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public land access to trail riding.

While cultural resources are certainly a priority issue for management and protection on any public lands, the Organizations believe the exceptional cultural resources in the Recapture Canyon area have become a surrogate for socially based user conflict resulting from increased visitation to this area. Education of all users is the only way to protect the cultural resources in the area and resolve these conflicts, and transferring ownership of the ROW would expand management resources that would be available for education of all users and protection of these resources.

User conflicts often exist outside motorized recreation, such as between skiers and snowboarders, heli-skiers and back country skiers, hunters and non-hunters, hunters and other hunters, hikers and bikers, runners and dog walkers on urban trails, and hikers and farmers. Despite the ongoing nature of these conflicts, motorized recreation on public lands is the only area for which closure has been asserted to be properly be the first method for remedying perceived conflicts. This position is completely arbitrary as user conflict, especially personal user conflicts often exist between users in the same general category and often occur regardless of the method of transport used to get to the area. Clearly cultural resources have been impacted since the motorized usage prohibition, and these types of impacts can only be addressed with education of all users.

Previous management adopted closures are the primary tool to address conflict and protect resources, which research has concluded is ineffective in dealing with socially based user conflicts and may actually increase levels of conflict, such as has occurred since the closure of the Recapture Canyon area. Research indicates that education of users is the most effective tool for addressing socially based user conflict, which is the largest type of user conflict. Adopting closures to address socially based user conflict can directly result in increased levels of conflict.

The Organizations believe that after a brief summary of research into user conflict, the difference in the previous management based on closures and best available science on the issue will be clear. Researchers have specifically identified that properly determining the basis for or type of user conflict is critical to determining the proper method for managing this conflict. The Organizations do not believe this level of analysis occurred as part of the decision to close the Recapture Canyon area to motorized users previously. Scientific analysis defines the division of user conflicts as follows:

“For interpersonal conflict to occur, the physical presence or behavior of an individual or a group of recreationists must interfere with the goals of another individual or group....Social values conflict, on the other hand, can occur between groups who do not share the same norms (Ruddell&Gramann, 1994) and/or values (Saremba& Gill, 1991), independent of the physical presence or actual contact between the groups.....When the conflict stems from interpersonal conflict, zoning incompatible users into different locations of the resource is an effective strategy. When the source of conflict is differences in values, however, zoning is not likely to be very effective. In the Mt. Evans study (Vaske et al., 1995), for example, physically separating hunters from nonhunters did not resolve the conflict in social values expressed by the nonhunting group. Just knowing that people hunt in the area resulted in the perception of conflict. For these types of situations, efforts designed to educate and inform the different visiting publics about the reasons underlying management actions may be more effective in reducing conflict.”²

Other researchers have distinguished types of user conflicts based on a goals interference distinction, described as follows:

“The travel management planning process did not directly assess the prevalence of on-site conflict between non-motorized groups accessing and using the yurts and adjacent motorized users.....The common definition of recreation conflict for an individual assumes that people recreate in order to achieve certain goals, and defines conflict as “goal interference attributed to another's behavior” (Jacob & Schreyer, 1980, p. 369). Therefore, conflict as goal interference is not an objective state, but is an individual's appraisal of past and future social contacts that influences either direct or indirect conflict. It is important to note that the absence of recreational goal attainment alone is insufficient to denote the

² Carothers, P., Vaske, J. J., & Donnelly, M. P. (2001). *Social values versus interpersonal conflict among hikers and mountain biker*; Journal of Leisure Sciences, 23(1) at pg 58.

presence of conflict. The perceived source of this goal interference must be identified as other individuals.”³

It is significant to note that Mr. Norling’s study, cited above, was specifically created to determine why travel management closures had not resolved user conflicts for winter users of a group of yurts on the Wasache-Cache National forest. As noted in Mr. Norling’s study, the travel management decisions addressing in the areas surrounding the yurts failed to distinguish why the conflict was occurring and this failure prevented the land managers from effectively resolving the conflict.

The Organizations believe that understanding why the travel management closure was unable to resolve socially based user conflicts on the Wasache-Cache National Forest is critical in the Recapture Canyon planning area and the transfer of the right of way to San Juan County. Properly understanding the issue to be resolved will ensure that the same errors that occurred on the Wasache-Cache are not implemented again to address problems they simply cannot resolve.

Please feel free to contact Scott Jones at 518-281-5810 or by mail at 508 Ashford Drive, Longmont, CO 80504 for copies of any documentation that is relied on in these comments or if you should wish to discuss any of the concerns raised in these comments further.

Sincerely,



D.E. Riggle
Director of Operations
Trails Preservation Alliance

Scott Jones, Esq.
COHVCO & TPA Authorized Representative

³ Norling et al; *Conflict attributed to snowmobiles in a sample of backcountry, non-motorized yurt users in the Wasatch –Cache National Forest*; Utah State University; 2009 at pg 3.