



November 29, 2018

PSI MVUM EIS Travel Management Team
Pike & San Isabel National Forests
2840 Kachina Dr. Pueblo, CO 81008

**Pike & San Isabel National Forest, Travel Management EIS
Comments regarding conversion of National Forest System Roads (NFSR) to
Multiple Use Trails**

Dear Mr. Dow:

We want to thank the Pike & San Isabel National Forest (PSI) for the efforts being made toward meeting the requirements of the Stipulated Settlement Agreement, Civil Action No. 11-cv-00246-WYD. In addition to the settlement requirements, we support your efforts to improve the system of motorized routes, and in the steps being taken to identify a minimum road system that will meet the future needs of the motorized and multiple use recreation community. As Intervener Defendants to the settlement agreement, we desire an outcome that is based on the best available scientific data and a decision that is in the public interest.

Please accept these comments on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). 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 multiple-use recreation. 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 lands access to diverse trail multi-use recreational opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users in Colorado seeking to represent, assist, educate, and empower all motorized 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. TPA and COHVCO are referred to collectively in this correspondence as "The Organizations." The Organizations offer the following comments and concerns regarding this project.

It has recently come to the attention of the Organizations that the PSI intends to revise the “Proposed Action”. Up to this point, the Proposed Action has been identified as Alternative B. Now, as a result of public scoping, the new Proposed Action will be Alternative C. We could possibly support this revision since Alternative C (with some modifications) emphasizes a safe and environmentally sound transportation system that consists of the routes currently in the Infrastructure Application System (INFRA), plus urgent priorities previously identified during the Travel Analysis Process (aka TAP) and documented in the associated TAP reports and addendums. This alternative also better addresses the Minimum Road System (MRS), which the Organizations could possibly support as long as the TAP Addendums are used to guide and advise the MRS process, and as long as the outcome from the MRS process improves the motorized recreation system of routes on the PSI. We also will likely support the creation of a Preferred Alternative for the final EIS, based on a modified Proposed Action, after evaluating public comments on the Draft Environmental Impact Statement (DEIS). We intend to identify a collection of sustainable trails, parking areas and travel areas that are being analyzed in Alternative D that should be included in the Preferred Alternative. Those routes and trails will be specifically identified during the public comment period allocated for the DEIS.

We appreciate the willingness of the PSI to provide the public with regular progress reports and updates via the *psitravelmanagement.org* website. Recently, **access to that website along with the reports and data work products was closed**, and we hope that the PSI MVUM EIS Travel Management Team will reconsider that decision to take down the website and once again provide reports, updates and data that will provide the public with sufficient information to follow the progress and participate in every step of this process.

Over the past few months, our recreation and transportation planning specialists have reviewed the publically provided data and information related to the alternatives, the TAP Addendums and the Minimum Road System process. The results of our review have provided us with some important conclusions and recommendations that we want to share with you prior to the publication of the DEIS.

The primary recommendation we have at this point in time is for the PSI to fully embrace the strategy of the conversion of roads to motorized trails. This strategy is a practical and a beneficial way of meeting the requirements of the MRS, and at the same time providing a safer, more economical, more environmentally sound and more flexible motorized route/trail system for public recreational uses. We feel it is important at this point to reiterate the following comment (along with several similar comments in our previous document) that our Organizations made back in 2016:

10. The Organizations would encourage and support the Forest’s decision to convert most any existing National Forest Service Road (NFSR) to a

Full Size Trail or another trail designation (e.g., Trail open to Motorcycles, or open to Vehicles 50" or less in width). We encourage the use of conversion techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council's (NOHVCC) 2015 Great Trails: Providing Quality OHV Trails and Experiences publication.

In our analysis, we have identified the roads most suited for conversion to motorized trails. They are the mixed-use roads, maintained at a maintenance level 2 (ML2), with a Moderate or High Recreational Use benefit rating in the TAP Addendums. Historically, these are the old Jeep trails that have been on the forest for many decades. Some of these trails were intended to provide access to remote dispersed camping sites, and others provided access to scenic vistas, while others were intended simply as fun driving opportunities that created looped routes for public, motorized, off-road enjoyment. When they were officially added to the NFSR system, mostly back in the 60's, 70's and 80's, these routes were put into the Roads database because at that time there was no official database/attribute for "full size motorized trails". Now with this EIS process, together we have the opportunity to correct that discrepancy and record these Jeep trails as National Forest System Trails (NFSTs), where they rightly belong.

Our analysis of the draft action alternatives spreadsheet reveals the following data:

- In Alternative C, there are approximately 1,372 miles of PSI ML2 mixed use roads. Of these:
 - 623 miles have an overall TAP rating of H/L (45%)
 - 539 miles have an overall TAP rating of H/H (39%)
 - 150 miles have an overall TAP rating of L/L (11%)
 - 60 miles have an overall TAP rating of L/H (4%)
- The High Benefit/Low Risk (H/L) roads are ideal roads as is, and for the most part should be kept as is, with very few if any conversions to trails.
- The High Benefit/High Risk (H/H) roads have unacceptable resource risks that need some type of mitigation to satisfy the requirements of the MRS. One of those mitigations that increases safety, reduces costs and better protects natural resources is the conversion to motorized trails. There are approximately 517 miles of H/H, ML2 roads in this category with a Moderate or High Recreational Use Benefit rating that should be converted to motorized trails.
- The Low Benefit/Low Risk (L/L) roads do not cause significant resource damage, and they do not have overall significant benefits, but the L/L roads with a High or Moderate Recreational Use Benefit rating should be converted to motorized trails. The data shows approximately 105 miles of L/L ML2 roads in this category.
- The Low Benefit/High Risk (L/H) roads have unacceptable resource risks that need some type of mitigation to satisfy the requirements of the MRS, and they also need a Moderate or High Recreational Use benefit rating to justify the conversion to motorized trails. There are approximately 37 miles of L/H ML2

roads with a Moderate or High Recreational Use Benefit Use rating that should be converted to motorized trails.

- The grand total of miles of mixed use, ML2 roads that should be shown in Alternative C as “Convert to Motorized Trail” is approximately 659 miles. The majority of these roads should be converted to full size trails, but some would be more suited as 50” ATV trails **and some as single-track motorcycle trails**. The intent of the TAP Addendums is to guide and inform the National Environmental Policy Act (NEPA) analysis and help move the PSI toward the MRS. The “Convert to Motorized Trail” strategy is based on the TAP results and informs the Environmental Impact Statement (EIS) in general and the Proposed Action MRS Alternative specifically.

The Organizations unequivocally support the “Convert to Motorized Trail” strategy as we have previously stated in our comments, and we encourage the PSI Travel Management team to use the reasoning provided above to increase the miles of roads converted to trails in Alternative C (and Alternative D) and to more closely match our numbers above. The current Draft Action Alternatives Spreadsheet has approximately 390 miles of road in Alternative C that will be analyzed for conversion to trail, so we would like to see that number increase by approximately 60%. When the DEIS is published, we will be looking specifically at the miles of roads converted to motorized trails in the Proposed Action alternative, and if that number is not somewhere close to 659 miles, we will be expressing our opposition to the DEIS in general and to the MRS process specifically during the comment period.

Conversion of roads to trails in accordance with the methods and techniques contained in Chapter 17 of the National Off-Highway Vehicle Conservation Council’s (NOHVCC) 2015 *Great Trails: Providing Quality OHV Trails and Experiences* publication would allow the PSI staff to be much more flexible, creative and innovative in meeting the increasing desires, needs and demands of the public to provide high quality motorized recreational experiences. The spectrum of possibilities to make “trails” more interesting, challenging and fun is much greater with trails than with the engineering requirements for “roads”. The Organizations would also offer that meeting the mandatory NEPA requirements can be, and is often more straight forward and expedient when considering the modifications or improvements to trails than for roads.

The Organizations are aware that there may be some concern that conversion of roads to trails for motorized use may cause trepidation that those routes would now require a State/Colorado Parks and Wildlife (CPW) OHV sticker for legal travel. The Organizations are very aware of, and in some cases participating in current statewide discussions to explore funding mechanisms and user fees to help supplement public land management agency operating budgets for activities beyond OHV use. The Organizations contend that expanded implementation of user fees for public lands will become inevitable in the future. That utilizing the highly successful CPW OHV sticker program for travel on motorized trails that have been converted from roads is

reasonable and in unison with the ongoing discussions to implement and expand user fees to activities other than OHV use, hunting, fishing, etc.

Thank you for your consideration of these comments. Together we hope to help develop a sustainable system of motorized routes on the PSI, and at the same time perhaps even help identify the minimum road system needed for safe and efficient travel and for the administration, utilization and protection of PSI and our National Forest lands.

The TPA and COHVCO would welcome a discussion of these issues at your convenience. Our point of contact for this project will be William Alspach, PE at 675 Pembroke Dr., Woodland Park, CO, williamalspach@gmail.com, cell 719-660-1259.

Sincerely,



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