



December 22, 2018

Dan Dallas
Forest Supervisor
Rio Grande National Forest
1803 W. Highway 160
Monte Vista, CO 81144

**Rio Grande National Forest, Forest Plan Revision and Travel Management
Comments regarding conversion of National Forest System Roads (NFSR) to Multiple
Use Trails**

Dear Supervisor Dallas:

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 suggestions regarding the enhancement of motorized recreational opportunities in the RGNF.

The TPA & COHVCO generally support the USFS' efforts and requirements to identify a minimum road system (MRS) that meets the future needs of the Forest along with the motorized and multiple-use recreation community for administration, utilization, and protection of National Forest System lands and resources, while providing safe and efficient travel and minimizing adverse environmental effects. The Organizations also acknowledge that the USFS must balance the need for agency and public access. By definition, a MRS must emphasize a safe and environmentally sound transportation

system consisting of routes recognized in the Infrastructure Application System (INFRA) along with urgent priorities identified during previously completed, forest-wide, Travel Analysis Process (aka TAP) and documented in the associated TAP report/documents. The Organizations thoughtfully support the designation of an MRS as long as the TAP report/documents are used to guide and advise the MRS process, and the outcome from the MRS process improves the motorized recreational system of routes on the forest.

The Organizations would request that during the Forest Plan Revision Process and subsequent Travel Management Process that the Rio Grande National Forest (RGNF) **re-consider** and embrace a more aggressive strategy of converting select National Forest System Roads (NFSR) to motorized trails. This strategy is a practical and a beneficial way of simultaneously meeting the requirements of designating a 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. *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). The Organizations encourage the use of conversion techniques described 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, the Organizations have identified the roads that are most suited for conversion to motorized trails. These are the mixed-use roads, maintained at a maintenance level 2 or in select cases level 1 (ML2, ML 1), with a Moderate or High Recreational benefit rating in the Road and Motorized Trail Benefit/Risk Matrix depicted in the 2015 TAP document. Historically, these are often the old Jeep or logging 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, predominantly back in the 60's, 70's and 80's, these routes were entered into the Roads database because at that time there was no official database/attribute for "full size motorized trails". Now with the requirement to designate a MRS, together we have the opportunity to correct a lingering discrepancy and record these Jeep trails as National Forest System Trails (NFSTs), where they rightly belong. The Organizations also support the consideration of designating select and appropriate maintenance level 1 (ML 1) roads as a trails (e.g., coincident route) to enhance the network of recreational routes for motorized use.

Our analysis of the RGNF Forest-wide TAP has led the Organizations to conclude that roads designated in the TAP as:

- High Benefit/Low Risk (*Matrix Category 1*) (893 miles/31%) roads are ideal roads as is, and for the most part should be kept as is, with very few conversions to trails.

- The High Benefit/High Risk (*Matrix Category 2*) (639 miles/23%) roads have heightened 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.
- The Low Benefit/Low Risk (*Matrix Category 4*) (1093 miles/39%) roads do not cause significant resource damage, and they do not have overall significant benefits, but the *Matrix Category 4* roads with a High or Moderate Recreational Use Benefit rating should be considered for conversion to motorized trails.
- The Low Benefit/High Risk (*Matrix Category 3*) (194 miles/7%) roads have an undesirable resource risks that need some type of mitigation to satisfy the requirements of the MRS, and if they also have a Moderate or High Recreational Use benefit rating may justify the conversion to motorized trails.

Conversion of roads to trails in accordance with the methods and techniques described 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 RGNF 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 desirable, interesting, challenging and fun is much broader with trails than with the stringent 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.

Financial Sustainability - Conversion of roads to multiple-use, motorized trails will make those routes eligible for Colorado Parks and Wildlife OHV grant funds (*which can specifically be used for the construction, reconstruction or maintenance of OHV routes or multi-use trails that allow for motorized use and other activities*). These conversions will thereby help reduce the direct financial burden and back log to the RGNF and can supplement funding with user provided funds that were previously unavailable for these routes. Conversion from roads to trails will also likely reduce the required maintenance level and reduce the necessary amount and back log of funding. By providing an adequate and varied inventory of routes and trails that fulfill the user’s spectrum of needs (today and the future) for variety, difficulty, destinations, challenge, terrain and scenic opportunity will lead to improved management and compliance requiring less future expenditures on maintenance, signage, enforcement, etc. Finally, the lack of fiscal capacity by the USFS/RGNF should not be criteria for, or lead to closures and reductions in public recreational opportunities, closure of routes or elimination of public access to the RGNF. For these reasons, the Organizations do not agree or support the **Actions That Respond to the Issues** cited on page 37 of the TAP Report:

Insufficient resources for maintaining existing system roads -
Action: *Reduce the number of road miles that need to be maintained or reduce the maintenance level to reduce maintenance costs. Reducing road miles that need*

to be maintained by converting closed roads to motorized trails would increase trail maintenance costs and is not a recommended action to reduce maintenance costs. (pg. 37, Rio Grande National Forest Forest-wide Travel Analysis Process Report, October 2015)

The Organizations are aware that there may also be concern that conversion of roads to trails for motorized use in Colorado may cause apprehension that travel on converted routes would now invoke the requirement for a State/Colorado Parks and Wildlife (CPW) OHV sticker for legal travel. The Organizations are very aware of, and in some cases are participating in 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 agreement 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 an enhanced, sustainable system of motorized routes on the RGNF, and at the same time help identify the minimum road system needed for safe and efficient travel and for the administration, utilization and protection of RGNF lands.

Sincerely,



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cc The RGNF Forest Planning Team (rgnf_forest_plan@fs.fed.us)