



June 16, 2023

Grand Mesa, Uncompahgre and Gunnison National Forests
Anthony Edwards, Deputy Forest Supervisor
2250 South Main Street
Delta, Colorado 81416

RE: Thompson Divide Withdrawal

Dear Mr. Edwards;

Please accept this correspondence as the input of the Organizations to request for public input regarding the Thompson Divide Mineral Withdrawal Planning effort. The Organizations are aware that planning for this area has a long and heavily conflicted history and as a result we are providing this input to protect world class recreational opportunities for the public in all forms. Prior to addressing the specific concerns of the Organizations regarding the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization representing the OHV community 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 TPA is an advocacy 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 motorized 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 multiple-use

trail recreational opportunities. Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA has also become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling through work with Federal and state land management agencies and local, state and federal legislators telling the truth about our sport. CORE is a motorized action group dedicated to keeping motorized trails open in Central Colorado and the region. Collectively, TPA, CSA, CORE and COHVCO will be referred to as "The Organizations" for purposes of these comments.

The Organizations have been involved in various legislative and land management proposals seeking to restrict or entirely exclude recreational access to the Thompson Divide area for decades. We are intimately familiar with the fact that some of these "community proposals" would have imposed draconian restrictions on recreational access to the area, with the significant expansion of Congressionally designated Wilderness in the area. While these legislative efforts started in the late 1990's, passage of these various legislative Proposals was never obtained. It is significant to note that while these efforts wallowed in the legislature, other land management proposals in Colorado were created and passed into law over a much shorter time frame. The Organizations believe this lack of passage of these proposals after more than 20 years of effort speaks volumes to the true public support for these pieces of legislation. Despite advocates claiming for decades there was broad community support, this community support has been insufficient to obtain passage of these Proposals

This long history of draconian management proposals from the Thompson Divide area stands in stark contrast to the direction and vision that was provided by President Biden's Proclamation issued on October 12, 2022 declaring the Camp Hale Planning area a National Monument. This Proclamation identified a very different vision for the management of the area and its world class recreational opportunities in all forms, which it clearly states as follows:

“In light of threats posed by vandalism, unmanaged recreation, and climate change, protecting the Camp Hale and Tenmile Range area of the continental divide will preserve its historic and prehistoric legacy and maintain its diverse array of natural and scientific resources, ensuring that the historic and scientific values of the area remain for the benefit of all Americans. Reserving this area would also honor the valor and sacrifice of the 10th Mountain Division, secure ongoing opportunities for Tribal communities to continue spiritual and subsistence practices, and enable the region’s modern communities and the Nation to continue to benefit from the area’s world class outdoor recreation opportunities.”¹

This Proclamation further clearly identifies a full range of ***world class*** recreational opportunities in the area, rather than the exceptionally narrow interpretation of recreation provided in legislative proposals for decades as follows:

“For purposes of protecting and restoring the objects identified above, the Secretary shall prepare a travel management plan to ensure appropriate access for the management and use of the area, which shall provide for motorized and non-motorized mechanized vehicle uses, including mountain biking, consistent with the proper care and management of the objects identified above.”²

Despite the clear vision and direction of the Presidential Proclamation, legislative proposals have again been introduced seeking to further reduce methane emissions and other activities from human activity in the Thompson Divide planning area.³ It is disappointing that even with the Proclamation, which was supported by a wide range of interests throughout the region, this was

¹ See, Proclamation at pg. 8. A full copy of this proclamation is available here: [A Proclamation on Establishment of the Camp Hale-Continental Divide National Monument | The White House](#)

² See, Proclamation at pg. 11.

³ See, §305 of S1634– a full copy of this Proposal is available here: [Text - S.1634 - 118th Congress \(2023-2024\): Colorado Outdoor Recreation and Economy Act | Congress.gov | Library of Congress](#)

not enough to finalize conflict around use of the area. What is even more disappointing is the fact the legislation would reduce recreational protections from the current requirement of protecting world class recreational opportunities in all forms to planning where recreational usage is merely a planning consideration.

The Organizations are aware that the limited motorized access to the Thompson Divide area is critical to all forms of world class recreational opportunities in the area. While there may be significant local pressure to close these routes in the mineral withdrawal efforts, routes that may be provided partially for mineral extraction reasons also have significant recreational values as well. We would vigorously support expanding recreational infrastructure in the area to support more world class opportunities. Closures of any routes without addressing the recreational value of the route would directly conflict with the presidential proclamation and would be highly pre-decisional.

The Organization's welcome this opportunity to provide input on the Proposal and planning effort and would voice strong support for the area continuing to provide world class recreational opportunities. This recreational activity is heavily reliant on the network of roads and trails in the area. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / scott.jones46@yahoo.com) or Chad Hixon (719-221-8329 / chad@coloradotpa.org)

Respectfully Submitted,



Scott Jones, Esq.
CSA Executive Director
COHVCO Authorized Representative



Chad Hixon
TPA Executive Director



Marcus Trusty
President – CORE

