



July 8, 2024

Senator Michael Bennet
261 Russell Senate Building
Washington, D.C. 20510

Senator John Hickenlooper
374 Russell Senate Office Building
Washington, D.C. 20510

Congresswoman Lauren Boebert
1713 Longworth House Office Building
Washington, D.C. 20515

Regional Forester Troy Heithecker
U.S. Forest Service, Rocky Mountain Region
1617 Cole Blvd.-Building 17
Lakewood, CO 80401

U.S. BLM State Director Doug Vilsack
PO Box 151029
Lakewood, CO 80215

Governor Jared Polis
200 E. Colfax
Denver, CO 80203-1716

Re: Possible Colorado River Canyon Monument designation

Dear Sirs:

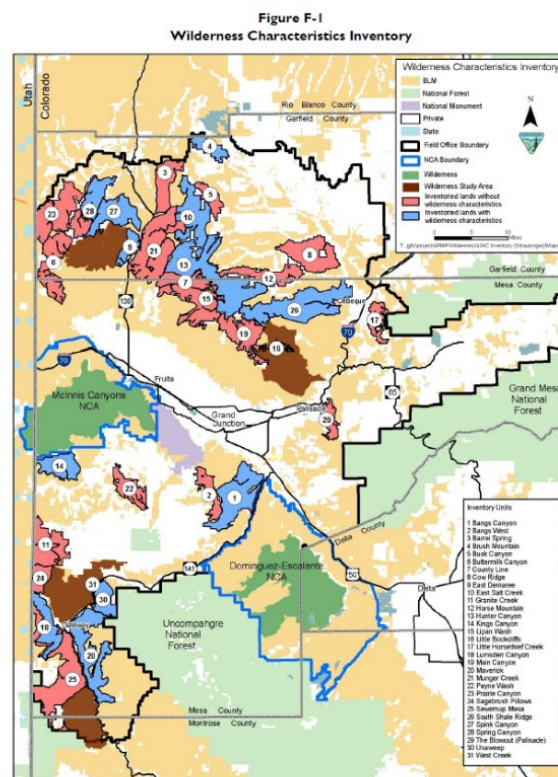
Please accept this correspondence as the Organizations vigorous opposition and deep concerns to the Proposed Dolores River National Monument. Our Organizations have been very engaged with the Proposal area for decades and have been monitoring this discussion in the hope of obtaining some type of clarity of what is and what is not being discussed. Given the confusion and conflicting messaging that is being displayed, we believe the time has come for us to state why we are opposing the Monument. Too often splashy headlines have been chosen over substantive meaningful discussions of ideas, developing understanding and possibly working towards a collaborative vision. Discussions have failed to provide consistency on what is being discussed and the inability to start from a single coordinated point for any discussion is deeply concerning. Too frequently certain groups are speaking for other user groups that they do not represent, and basic questions, like what is wrong with current management of the area, are not addressed.

Our opposition to the Proposal starts with a question: “What has changed in the management of these areas since the close of the last collaborative efforts around management of these areas?” Our position is that nothing has changed. Some groups assert they did not get the outcome they desired out of recently completed planning efforts and clearly this small number of groups have sought to drive this effort because they did not get what they wanted. This is a major concern as the motorized community lost opportunities in the GJFO RMP revision and appears to be the only group that would immediately lose access in this Proposal as well. Rather than identifying areas where access could improve, these discussions seem to start with a position that all closures for multiple use remain in place, and access will be lost in many more areas as well. This simply is not collaboration in any form and for obvious reasons this is unacceptable for us.

Existing planning was completed less than a decade ago.

The Organizations have a long history of collaborations and discussions in this general planning area, including efforts around the development of the BLM Grand Junction FO RMP in 2015, the BLM Tres Rios FO RMP finalized in 2013 and the USFS GMUG RMP update completed in 2022. Our efforts to collaboratively resolve management of this area have literally spanned more than a decade. Despite more than a decade of discussions and attempts to balance these concerns in planning with management efforts, much of the concerns raised by supporters of the Monument were found to be factually incorrect in previous planning. As an example, in the recent GMUG planning efforts, there was a narrative from some groups that wildlife populations were collapsing. This was not supported by any documentation as when the population goals for wildlife were reviewed, elk populations on the GMUG were 30% above goals and deer populations were only slightly below objectives due to heavy snowfalls during the last several years. We have little interest in collaboration to resolve issues such as these. The information being used is often incorrect or the management solution cannot be provided in any regulatory process.

We believe that it is important recognize the almost complete overlap of the GJFO analysis areas and the current monument Proposal. Many of the areas now sought to be made a Monument and be subjected to immediate access restrictions, were specifically reviewed for higher levels of restrictions to the public in the Grand Junction Field Office RMP development process. Those restrictions were eventually declined to be applied by land managers. Some of these areas had important trails for all forms of recreation that were lost, while access to other areas was maintained despite citizen proposals to close the entire area.



Generally, we thought that planning documents such as the GJFO RMP struck a reasonable balance of interests in this area as no single group got exactly what they wanted. Generally, the Organizations would assert that management needs to occur in the area as the largest concern we hear in the area is poor signage and a lack of infrastructure. There is no need for more

collaboration on further restrictions to public access as RMPs have been updated. While we are aware there is legislation that would force a collaboration type effort, prior to our support for any collaborative, we must receive a reasonable answer to why any collaborative effort for the area would thought to be needed.

Once questions of why collaboration would be reopened on issues resolved in the GJFO RMP, we would like to understand how the starting point of any collaboration was established as motorized access to areas that were closed in the RMP would be outside the scope of reopening. Several of these areas have historical access and we would like to have that access restored. If a collaborative effort were to move forward clearly everyone should start with an equal foundation and position. The Proposal fails to provide that foundation as it starts the motorized community from a double loss position as we cannot reopen discussions on access to areas closed in the RMP and motorized is the only group that would immediately lose access, with a prohibition on road construction, is the motorized community. The Organizations are further disappointed that the only motorized value recognized by many in this discussion is the Rimrocker trail. While the Rimrocker Trail is an important resource in the planning area, it is far from the **only** value in the area.

Collaboration fatigue.

We are also concerned that many in these discussions seem to want to force another collaborative effort despite the failure to explain the need for the collaboration in the first place. Collaboration simply to collaborate is of little value and exacerbates a consistent issue we are seeing throughout the State. There are simply too many collaboratives on too many issues and this over collaboration diminishes the value of all collaboratives. Many of the public simply do not have time to participate in each of these efforts despite the public interest in the effort or topic being addressed. Too often these collaboratives start with a particular target but as time passes the target of the discussion shifts to other topics, often without public notice of these changes. This only further diminishes the value of any collaboration as we should look forward rather than reopening issues.

The sheer number of collaboratives in the last several years has become overwhelming. Colorado has collaborated on wolves, we expect to be collaborating on wolverines in the near future, the western slope has been through multiple federal forest level planning efforts, dozens of site specific NEPA efforts, the Governor's Office is driving efforts to balance recreation and conservation through B2020-008, forest health efforts with the USFS. This creates a situation where there are too many collaboratives function at the same time as often we hear that multiple meetings are occurring on the same nights at the same times.

We must ask why another collaborative is thought to be needed for issues we see as resolved? Often basic questions such as these are simply not addressed. If these existing groups do not want to discuss a citizen proposal, that is a statement of the lack of support on the Proposal and not the need for another collaborative effort. It is our position that the Proposal does not have sufficient support to move forward with any effort as most communities that are near the planning area have already opposed any further efforts towards a monument.

Our partnerships with land managers.

The Organizations have taken a very different collaborative path to provide sustainable recreational opportunities in the planning area. Rather than developing another legislative effort that never gets implemented or seeking another round of planning, the Organizations have partnered with land managers to provide funding for the actual management of these areas. This effort has now spanned more than 50 years in partnership with CPW. This collaborative effort provides funding rapidly approaching \$10 million in grants a year to land managers for the management of public lands. While we are proud of the benefits this program and the benefits of sustainable recreational opportunities it provides for all users of public lands, this program takes significant volunteer effort to administer and implement. Partner grants must be applied for and managed, contractors must be overseen, tax returns must be completed. These are all done by the same volunteers that are now being asked to collaborate with those that want to

close these opportunities. This request must be declined by our interests as we support current management and will not benefit from the monument designation.

We are intimately aware of the current budget situation facing federal managers and we are the only recreational group working to mitigate this situation by directly funding staff for these managers. If there are additional funding needs that are unmet, we provide some of that funding. We are aware that regardless of management prescriptions for any area, management still needs to occur and that takes money and staff on the ground. Managers still need to monitor areas and maintain infrastructure. If there is a seasonal closure in place to protect wildlife, managers need to open and close gates in the area. We often fund employees to do this. If the agency cannot afford gates, the program will buy them as well. The Organizations are VERY disappointed that despite our decades of partnership with managers for the benefit of all uses, the motorized community is the user group that starts from a double lose position in current discussions. This is simply unacceptable to us.

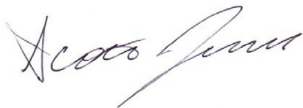
The management decisions currently in place are also driven by the fact the motorized community is the only recreational group who has been legally required to balance recreational opportunities with wildlife/resource protection. This balancing has occurred since Executive Order 11644 was issued by President Richard Nixon in 1972. Over this 50-year span, we have worked hard to proactively address wildlife/resource needs in conjunction with recreation. This effort has a successful partnership of interests and in most areas of the state, wildlife populations were well above goals for the species and often challenges were entirely unrelated to motorized recreation. Our Organizations have also become the single largest partner with land managers in funding sustainable recreational opportunities on public lands across the state. This partnership and its benefits have been repeatedly recognized by agency leadership. Despite this recognition by managers, motorized usage is the only group to double lose in any monument proposal. We are very concerned that while many groups have made insignificant contributions to protect resources and wildlife, their concerns are provided greater protections. Again, this is deeply disappointing.

Conclusions.

We are forced to vigorously oppose the possible creation of the Monument as basic questions around the need to establish the need for a monument have not been resolved. Why would collaborations that spanned almost a decade and resulted in the GJFO RMP be reopened simply because a small portion of the public did not get exactly what they wanted. Even if the need for a monument was established, many of the proposed starting points for any discussion are entirely unacceptable to us. Many of these proposed starting points of discussion are not just insufficient but are insulting to our interests and the decades of funding that we have provided for the management of this area.

The Organizations and our partners remain committed to providing high quality recreational resources on federal public lands while protecting resources and would welcome discussions on how to further these goals and objectives with new tools and resources. We simply do not believe the designation of the area as a Monument achieves this goal as rather than resolving conflict, the effort would create conflict and exacerbate the overly collaborative situation we are seeing in Colorado currently. 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