



June 1, 2009

Gunnison Travel Management Planning Team  
GMUG National Forest  
2250 Hwy 50  
Delta, CO 81401

**Re: Gunnison Basin Federal Lands Travel Management DEIS**

Dear Planning Team:

The following comments and attachments respond to the opportunity for the public to comment on the “Draft Environmental Impact Statement, Gunnison Basin Federal Lands Travel Management”, February 2009.

We thank the Planning Team and the leadership of the Gunnison Basin federal land units for their efforts to include the public in the development the proposed Travel Management Plan. The process has continued since the 2001 Gunnison Travel Interim Restrictions Decision Notices by the joint agencies.

The comments and recommendations in this letter and its attachments represent the combined input of the Trails Preservation Alliance (TPA), the Colorado off Highway Vehicle Coalition, (COHVCO), and the Rocky Mountain Enduro Circuit (RMEC). These 3 organizations represent the majority of off highway vehicle users in the State of Colorado. The off highway vehicle users in the state number more than 200,000. The TPA, COHVCO, and RMEC, as well as many local clubs and organizations have been actively involved with the GNF TMP process for the last 8 years. The analysis provided in this document includes the consolidated remarks from many of the local OHV organizations in the state. All of these organizations have spent considerable time and effort in the review of the GNF TMP. The TPA, COHVCO and the RMEC intend to remain as active partners with the FS throughout the remainder of the TMP process.

Since 1994 these three organizations, their local clubs, many recreationists and the Colorado State Parks OHV Program have provided program leadership and grants of \$ 1,615,744 and thousands of man hours of volunteer labor to the Gunnison Basin area trails program. We feel we have gone a long way in providing for and maintaining a multiple use trail system, while also supporting the needs of all users for open and safer trails. There has been very little accommodation, especially by the BLM in this planning effort, to perpetuate, design or enhance a quality motorized recreation programs at historic levels. . We, in example, are particularly disheartened and feel betrayed by seeing historically motorized trails like Agate Creek and the



Crest Trail, enjoyed for years and maintained by motorized grant money and crews, be moved to a non-motorized category.

This eight year time period and associated interim processes have now been impacted and altered by the additional requirements of the 2005 “Travel Management Rule”. The time requirements and processes for implementation of this new Rule to create a motor vehicle use map (MVUM) and associated orders has put another unfunded burden on the USFS and BLM. It has also created additional impacts on the time and resources of communities and the various user groups. While it has been an important and necessary process, changes in agency leadership, change in community and user demographics, public use patterns, and trends in recreation vehicle design and use continue to create unsettled management dilemmas for all concerned. In the DEIS, it is clear that the planning team specialists were directed to just display and discuss the impacts created by motorized uses, while impacts by foot, horse and mountain bikes have been omitted and ignored. There is no science cited for multiple use impacts on streams, riparian/aquatic systems, and wildlife by multiple use recreationists.

The predictability and sustainability of trail opportunities is held in the highest regard by all public land user groups as evidenced by national statistics on outdoor recreation use, and many thousands of hours of volunteer time and resources. So, it has to be a shared frustration that agency leadership, staffing and budgeting issues continue to plague timely decision making, directly complicate, and contribute to the agencies roles and responsibilities for continuing “unmanaged recreation”.

We have been a part of the Gunnison Basin travel management process for over 30 years, and have enjoyed the many, year-round opportunities for motorized recreation. We have continued to share the multiple-use, public land ideal with all other trail groups. Our members support the ideas of wilderness and non-motorized recreation activities and we have helped contribute millions of dollars in grants and manpower to the benefit of all trail users, agency budgets and trail crews. We know how to share public land recreation opportunities, and we will continue to do our best in the education of users to respect others and help steward natural resources and respect for management agencies. We hope that the agencies will try to foster this same level of respect from other user groups for motorized recreationists.

However, after each planning, executive or legislative process over the years we continue to lose miles and quality of motorized trail opportunities. The aggregate affect of decisions for Wilderness additions, special area designations, roadless regulations, staffing and budget reductions, disinvestment and decapitalization of trail and road infrastructure continues to reduce motorized recreation opportunities. The 2005 Travel Rule has left a system of rushed local decision making to Rangers, Supervisors, and Managers that have only been loosely coordinated between some Forests. There is no analysis or disclosure of regional or state-wide consequences or effects of these connected actions. In light of the regional and national USFS, BLM and Departmental deference to local decision making and politics under the 2005 Rule, it is no wonder that uncoordinated local decisions continue to erode motorized recreation opportunities.



It has been a continued struggle over the years, after many well intentioned public meetings and agency staff meetings, to develop a confidence that agency officials would fairly seek to balance user opportunities. We have been confronted by statements of responsible agency officials that say they would prefer to have no motorized use on public lands at all. Then, the same officials are responsible for recreation/travel management planning team assignments. This is not an investment in public confidence for a fair and balanced analysis or decision document. We have been concerned about potential agency staff bias at a local level since our response to the draft Travel Management Rule in 2005 and the subsequent Manual direction. This concern has continued to be displayed in all subsequent local Travel Rule planning processes. We continue to find local official and agency bias against sustaining quality motorized recreation across a variety of federal land, outdoor settings. Recreation sciences are weak or neglected, and the social economic analysis is shallow and non-responsive. Most importantly, full disclosure of all trail opportunities and recreation settings are missing.

Examples of bias include only using motorized trail impacts in discussions of streams, fisheries, and wildlife and wetland vegetation. There are no mountain bike discussions regarding these impact areas, and no research cited at all. Further, insensitive bias (see page 136) is suggested when staff described the popularity of motorized recreation in Taylor Park as being “under siege” by ATV’s, and on the same page the popularity of mountain bikes in the Crested Buttes area as being “the cradle of mountain bike recreation” and the trail system as “legendary”. In the spirit of full disclosure, we did find the recognition of the Gunnison Ranger District as providing the “gold standard” for use opportunity.

The history of the single track trail system in the CB/Taylor Park area can be documented starting in the 1960’s. This entire trail system that is in place today was built and maintained by motorcycle users, by converting old logging and mining roads into a recreational multi use trail system. We do acknowledge that in the last few years, the mountain bike community has been actively involved in trail building and maintenance. However, the historic lineage and the contribution of \$1.6M in OHV funding has been the backbone of sustaining the trail system we have today. Every trail that is being closed in the Preferred Alternative, has had OHV funding utilized to maintain it. This is be either direct OHV grants, or by the utilization of the OHV trail crew through the Good OHV Management program. This include the Agate Creek and Crest Trails.

The Gunnison Basin DEIS, in the presentation of “Issue 2”, Recreational Experience and Opportunity, Motorcycles, (pg.23) states that users wanted loop trails and “did not want dead-end routes”. This does not reflect an accurate representation of the motorcycle users that we represent, and we fear that the planning team and transportation planners over re-acted by removing short dead end trails. This removal of short, dead-end trails was also highlighted at the public meeting in Gunnison as a positive response to issues. Our concern is that this strategy will concentrate dispersed recreation campers along designated, higher volume routes and remove the opportunities for motorized reservationists to enjoy semi-primitive, back country camping like



other user groups. This will prove to create additional conflict based on the continued loss of back country recreation. We appreciate the challenge that travel planning presents, but the lesson to be learned here is that site-specific analysis must occur across the entire project area for all uses, and that a set of inflexible rules or templates will not produce a logical or workable end product. Some dead-end routes should not be designated, while others provide essential access to important destinations or to long-utilized and appropriate dispersed camping opportunities, the continuation of which enhances sustainable management and minimizes impacts to physical resources.

Colorado's population grew by 145 percent between 1960 and 2000. The U.S. Census projects that Colorado will continue to grow at a rate triple to the national average and another 1.5 million people will live in Colorado by 2030. People choose Colorado because of its public lands and access to outstanding outdoor recreation settings and its diversity of outdoor activities. The off-highway vehicle registration program in Colorado has grown from 55,000 permits in 2000 to 132,166 in 2008, a 140 % increase. Of the 2008 permits, 31,013 were issued to non-resident, Colorado visitors and tourists. In recent years, there have been approximately 750,000 ATV's sold annually in addition to 250,000 motorcycles. The need for a responsive and coordinated set of motorized road and trail opportunities is now more important than ever.

The economic and social impacts to the recreation and tourism industry in the Gunnison Valley and its communities need further disclosure and analytical rigor in this regard. This is not a discussion about which user group has more affluence. Rather, what are the specific demographics of Gunnison County, their dependency on the travel and tourism economy, job and income opportunities, multiplier values of the recreation dollar that would vary with alternative recreation opportunities? Contacting the Colorado State Demography Office and the Region 10 Economic office would provide valuable support to further display the social and economic effects of the TMP decisions on Gunnison County.

Motorized recreation continues as one of the fastest growing activities and the national recreation survey shows that the demographics of users is changing to include more older citizens and minority groups. There is a USFS planning document, (NVUM 2008) that highlights the increase of OHV recreation and the justification to address the users recreation opportunities. However, the Gunnison TMP shows an obvious bias for non-motorized recreation by providing a dramatic growth in mountain bike opportunities, reducing the single track opportunities for motorized recreation. There was little effort made to conduct a rigorous needs analysis at any level (national, regional, or local) as the basis to establish the basis for a balanced approach as required in the Travel Rule. This also ignores the trend toward older recreationists turning in their non-motorized means of travel for those that suit the needs of those with arthritis, knee and hip problems and simple old age. This is hardly the proposition that taxpayers of the past 50 years will appreciate. Perhaps not a direct Rehabilitation Act violation, but then again not everyone can keep a horse. At some point when hundreds, if not thousands, of older recreationists are told that as long as some form of non-motorized recreational means exists they



can employ it or stay off the forest a new more powerful argument will be revived in the federal courts.

Additionally, since the terms “needs analysis” and “social sustainability” remain vague and undefined, it is reasonable and practical that age and disability as relating to access are elements of any analysis purporting to address needs and social sustainability.

Local federal agencies, instead of fostering and leading multiple-use trails and enhancing all-around recreation opportunities, continue to segregate mountain biking and motorized use that continues to perpetuate unnecessary conflict. While mountain bikes enjoy nearly the full spectrum of trail opportunities outside Wilderness areas, the motorcycle community is regulated to a very small percent of the trails. The use of the term “user conflict” is not valid and displays a bias by the USFS/BLM planning group. The Gunnison Basin agencies, citing reducing user conflicts as a justification, tend to continue to invest in a public land management style that rewards user group intolerance by a small group of users instead of encouraging maximum sharing of public land opportunities. This management position is contrary to the basic advocacy position of responsible motorized recreationists, and also of the International Mountain Bicycling Association (IMBA) who ask “for shared-use trails because we (IMBA) know that shared-use trails best accommodate the needs of the most users, minimize total environmental impacts, are most economical, and best build a trail community”.

The Crest Trail on the Continental Divide at Monarch Pass is an example of where the proposed alternative shifts long time (50 years) historic use from motorized to hiking/biking. Motorcycle use on the Crest Trail pre-dates the CDNST Act, and even the act protects existing motorized routes. The proposed alternative is a conflict producing decision that violates good recreation management principles. If the agencies want to continue to grow conflict, ignoring the research on the impacts on users and relocating old, historic uses and travel patterns with newer activities requiring exclusiveness, this kind of decision making and rationale is the way to do it. We recommend that the Crest Trail remain open to multiple-use as it is a distribution point for a diversity of users.

In a recent meeting with FS recreation personnel, we found out there may be some pre-decisional “deals” being made with the Gunnison Area regarding the Crest Trail. There is a perception by these personnel that most motorcycle riders would rather use Green Creek as an access and they do not need that section from Monarch Pass to Green Creek. This is totally untrue. The Crest Trail in its entirety is a focal point for all trail users in the area. The Green Creek Trail is too difficult for most riders, novice and older riders will be greatly impacted with any closure of the Crest Trail, with it’s key connections to other routes. Whatever data collection was done by planning personnel or local managers was wrong. Further, a local bike rental business in Salida is already telling its customers the Crest Trail is non-motorized and this is causing more conflict and confusion...not to mention contrary to a fair and open planning process that is supposed to be coordinated between adjoining ranger districts and forests.



We are particularly concerned about the lack of opportunity on BLM land, where great opportunity exists, but few trails are available, plus the impact of massive seasonal closures. In the April Gulch, upper Beaver Creek and areas South of US 50, there is a vast potential for developing a multiple use trail system. Yet, a road that has been shown as closed on USFS and BLM maps, is actually an open county road. We feel that the BLM could be much more open to motorized recreation in this area.

The TMP document while it follows the general requirements of NEPA, NFMA, and the 2005 Travel Rule, appears largely as an engineering route and road finding exercise that has been overly influenced by the need to eliminate user conflicts defined and demanded by a small group of users. The definitions of “balance” and “sustainability” remain conveniently undefined in both terms of social need, economic impacts and recreation activities. The use of the concept of “fairness” in the allocation of use process has been confused, creating a bias against managed recreation and being partially non-responsive to the requirements of the Travel Rule to enhance recreation opportunities. One major failure of the DEIS is the identification of many “UT” trails on the maps. This makes commenting on these routes nearly impossible. We have done our best to make sense of these routes, with assistance from Garth Gantt. We believe that a Supplemental EIS is required by law to meet public disclosure requirements.

The DEIS does not give adequate consideration to the ability of licensed motorcycles, which are extremely common, to utilized mixed use routes, thereby not being restricted to designated OHV routes. This opens up the opportunity for use of many short UT routes as important connectors.

In our detailed comments, you will find a summary of recreational opportunity by mode of transportation. But unlike the analysis in the DEIS, this summary shows the actual available opportunity through multiple use, i.e. hikers can use all trails designated for horses, mountain bikes, motorcycles and ATV's. We then calculated the expected number of recreational days by type. ATV's are afforded 3 days of recreation opportunity, motorcycles 5 days, mountain bikes 24, horses 65, and hikers a whooping 130 days. When the 540 miles of Wilderness trails are included, horse opportunity goes over 90 days and hiking goes over 180 days! The planning team should seriously consider this approach, because it is the simple reality.

We remain hopeful, open and anxious to work with agency planners and decision makers to discuss our continuing issues, and more importantly site specific road and trail recommendations.

We request that Alternative A be accepted as the preferred alternative, and that information submitted by the OHV community be reevaluated by the FS/BLM staff. Our specific comments and recommendations are attached.

Sincerely,



Don Riggle  
TPA Chairman  
P.O. Box 38093  
Colo.Springs, CO 80937  
[info@coloradotpa.org](mailto:info@coloradotpa.org)  
719-338-4106



Dennis Larratt  
RMEC Treasurer  
10990 N. Sunshine Dr.  
Littleton, CO 80125-9432  
[larratt@mho.com](mailto:larratt@mho.com)  
720-530-9974



Glenn Graham  
COHVCO Chairman  
P.O. Box 620523  
Littleton, CO 80162  
[ggraham@cohvco.org](mailto:ggraham@cohvco.org)  
303-249-9730