



July 20, 2017

Attn: Forest Plan Revision Team  
Grand Mesa, Uncompahgre and Gunnison National Forests  
2250 South Main St  
Delta, Colorado 81416

### **Grand Mesa, Uncompahgre and Gunnison National Forests - Forest Plan Revision**

Dear Forest Plan Revision Team:

Please accept these initial and preliminary comments regarding the **Grand Mesa, Uncompahgre and Gunnison National Forests - Forest Plan Revision** on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). These comments are likely to be augmented and supplemented in the future as our discussion and participation in the Grand Mesa, Uncompahgre and Gunnison National Forests - Forest Plan Revision continues. 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 insure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail multiple-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 multiple-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 regarding the **Assessment Phase** of this project.

1. The following comments are provided regarding the published Assessment Updates for Plan Revision ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd542434.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd542434.pdf)):
  - a. **Topic Area - Recreation:** The existing document lists two new recreation technologies, drones and fat [tire] bikes. We feel it is vitally and equally important to list and recognize the changes in Recreational Off-Highway Vehicles (ROV) and Utility Terrain

Vehicles (UTV) (AKA “Side by sides”) sizes and technologies along with the proliferation of “e-bikes”. We also feel the meteoric rise in demand for multiple-use single track must also be specifically listed and recognized.

- b. **Topic Area - Infrastructure:** In order to address the USFS’s emphasis on identifying and implementing a “Minimum Roads System (MRS)”, the opportunity to convert existing National Forest System Roads (NFSR) to multiple-use National Forest System Trails (NFST) should be included and listed as an appropriate “update”.
  - c. **Topic Area - Ecosystems, including Drivers and Stressors:** To address the topic of climate change, minor updates due to data changes should be listed for potential USFS design criteria to include values such as Design Storm Frequency, Rainfall Intensity, Runoff Coefficients coupled with appropriate sizing of the supporting drainage infrastructure (*e.g. ditch sizing, culvert sizing, rip rap sizing, re-vegetation practices, trail/road alignment, etc.*). Updates to these criteria should be developed to mitigate more extreme weather events and any increased flows that might be attributed to climate change.
  - d. **Topic Area – Social and Economic Contributions:** The following report must be utilized to help identify changes, trends and the substantial economic contributions of Off-Highway Vehicle Recreation in Colorado: <http://www.coloradotpa.org/2017/01/25/economic-contribution-of-off-highway-vehicle-recreation-in-colorado/>
2. The TPA and COHVCO both firmly believe that multiple-use access and motorized recreation within the **Grand Mesa, Uncompahgre and Gunnison National Forests** is, and will continue to be, vitally important to the economic vitality of Southern Colorado and an expected component of the recreational experiences provided by our public lands. We stand behind a sustainable and robust network of multiple-use/motorized routes and trails that sufficiently serve the needs and demands of all forest visitors.
3. The Organizations believe that continued multiple-use access and motorized recreation within the **Grand Mesa, Uncompahgre and Gunnison National Forests** is vitally important to the preservation and conservation of our public lands and the well being of our citizens. Our Organizations have a history of partnering with the USFS to protect our forest resources while reducing and eliminating barriers that are continuing to make it difficult for Americans to get outside and travel on a multiple-use trail or share a road as part of their outdoor recreational experience.
4. Together the TPA and COHVCO are committed to the development of a fair and reasonable revised forest plan, and are pleased to offer our collective assistance and expertise to this vitally important project. As with the ongoing Pike & San Isabel National Forests’, Motor Vehicle Use Environmental Impact Statement and the Rio Grande National Forest, Forest Plan Revision

Project, our Organizations are both prepared to apply our combined resources as a contributing partner and involved constituent in this project.

We thank you for reviewing and considering these comments and suggestions.

Sincerely,



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