



August 31, 2017

GMUG National Forest  
Att: Scott Armentrout, Forest Supervisor  
2250 South Main Street  
Delta, CO 81416

Re: GMUG Resource Management Plan Revision

Dear Mr. Armentrout:

Please accept this correspondence as the input of the Organizations identified above with regard to the Proposed Revision of the GMUG RMP. We welcome this opportunity to provide input following the first round of public meetings addressing the proposed forest plan revision. We would like to provide input on a few components in the final RMP which we believe could streamline planning significantly moving forward, provide new information and address several issues that consistently arise early in the Forest Service planning process on other forests in the hope of partnering with the GMUG to develop an effective long term plan for the forest. These comments are submitted as a supplement to the site specific input provided from the local clubs on a wide range of issues, such as culvert size and future utilization of decommissioned roads as trails. The Organizations vigorously support the input from these local clubs.

Prior to providing initial thoughts and concepts on the development of the GMUG RMP, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization the 150,000 registered OHV users in Colorado 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 Trail Preservation Alliance ("TPA") is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA advocates for the 30,000 registered snowmobiles in the State of Colorado. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. For purposes of this document CSA, COHVCO and TPA are identified as "the Organizations".

While the primary mission of the Organizations most directly relates to motorized recreation, the overall scope of the Organizations often has a larger impact as motorized recreation and access can take many forms and involve many activities, including camping, hunting and fishing and other recreational activities where motorized access to public lands is critical but not the primary recreational activity sought. Under federal land management standards, when an area is open to motorized access it is rarely closed to any other activity.

The Organizations welcome the opportunity to provide input on forest level issues facing the GMUG and are additionally providing new information and research in these comments on a variety of issues to insure that the best available information is relied on by Forest planners in the development of the Resource Plan. The Organizations would urge planners to clearly identify the three major challenges that are expected to be encountered on the Forest over the life of the RMP, in order to streamline and insure alignment of any subsequent site specific

planning with addressing these challenges. The Organizations also would like to clarify our position on several issues, such as our complete lack of involvement in the development of the Gunnison Public lands Initiative and the fact that the Organizations are vigorously opposed to the Proposal. The Organizations also submit that issues such as the Gunnison Public lands Initiative are good examples of Proposals that should be entirely avoided in the RMP development as they will direct the ever declining Forest Service resources away from the major challenges that are facing the GMUG and could in fact make addressing the poor forest health issues both more costly and difficult on the GMUG in the future.

**1a. Landscape level planning should address landscape level issues.**

The Organizations welcome the Forest planner's desire expressed in the presentation boards at the initial round of public meetings, to address landscape level issues with landscape level planning and avoiding the often high levels of pressure to transform landscape level planning into nothing more than numerous local plans that have been merged together. It has been the Organizations experience that merely combining numerous small plans into a single large plan results in poor analysis of issues facing these projects, poor coordination of planning efforts and an exceptionally complex plan that results in large barriers when landscape level plans issues are addressed. This should be avoided.

An important component of landscape level planning is the fact that the RMP should provide general guidance on issues and streamline subsequent site specific planning on the forest. The Organizations submit that identifying a limited number of landscape level challenges facing the Forest will serve as an important guide for the development of the RMP and any subsequent localized projects. Identifying these challenges will provide clear and easily reviewable guidance for subsequent projects on the Forest and avoid creation of site specific projects that would contradict the forest level guidance on issues. This will also insure that all actions being undertaken in site specific planning are working towards these forest level objectives and avoids the artificial elevation of issues in local planning. By insuring these factors are addressed

in all planning efforts subsequently, the limited resources that are available to land managers will be directed in the most effective manner in addressing these challenges.

The Organizations believe that the following criteria reflect the major challenges the forest is facing, and are already reflecting in the supporting documents that have been provided to the public:

1. Poor Forest health/large number of dead trees on the GMUG overall;
2. Declining federal budgets will continue to decline and result in the need for stronger partners; and
3. Increasing demands being placed on forest resources due to a rapidly increasing State population.

The GMUG has been heavily impacted by the Mountain Pine Beetle epidemic and is on the boundary areas of being heavily impacted by several other invasive species such as the Spruce Beetle.

This challenge has to be the first priority to be addressed in the RMP development and the Organizations would note that the Rio Grande NF has already identified poor forest health as the single largest challenge to be faced in their RMPM development. These are factors and issues that can be addressed in forest planning to stimulate and streamline timber sales and timber management in conjunction with managed fire to remediate impacts. The Organizations are aware that there is significant pressure on managers to reduce public access to public lands through route closures, but addressing any route specific impacts without addressing the poor forest health simply makes little sense.

**1b. The primary threat to be addressed on the GMUG over the life of the next revision of the RMP has to be the poor forest health overall and the large number of dead trees.**

Developing an accurate identification of the challenges that will be facing the GMUG managers over the life of the next revision of the GMUG RMP must be the major goal of any scoping efforts. Planners must avoid the artificial elevation of issues simply as a result of political

pressures or concerns that are not based on issues seen on the GMUG. The Organizations vigorously submit that theoretical concerns, such as a groups desire to bring balance and diverse recognition of landscapes into the National Wilderness System are political issues that have been artificially elevated by that Group and simply are not realistic goals in the current funding environment and with the major challenges facing land managers on the GMUG. The Organizations are deeply concerned regarding the poor forest health in the GMUG as a healthy forest translates into a quality recreational experience for ALL USERS. While an short term recovery of the GMUG planning area to a healthy forest status is probably not realistic, major steps can be taken to remediate impacts and return a healthy forest to the public in subsequent generations.

The Colorado State Forest Service recently issued their annual Forest Health report for the state and the conclusions of these impacts are staggering, especially on water quality.<sup>1</sup> The Highlights of the 2016 report are as follows:

- 8% of ALL trees in the state are dead and the rate of mortality is increasing;<sup>2</sup>
- the total number of dead trees has increased 30% in the last 8 years;<sup>3</sup>
- Research has shown that in mid-elevation forests on Colorado's Front Range, **hillslope sediment production rates after recent, high-severity wildfire can be up to 200 times greater than for areas burned at moderate to low severity.**<sup>4</sup>
- A 2011 study involved monthly monitoring of stream chemistry and sediment in South Platte River tributaries before and after fire, and showed that **basins that burned at high severity on more than 45 percent of their area had streams containing four times the amount of suspended sediments as basins burned less severely. This effect also remained for at least five years post-fire.**<sup>5</sup>

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<sup>1</sup> A complete copy of this report is enclosed with these comments for your reference as Exhibit 1. (hereinafter referred to as 2016 Forest Health report.

<sup>2</sup> See, <http://csfs.colostate.edu/2017/02/15/800-million-standing-dead-trees-colorado/>

<sup>3</sup> See, 2016 Forest Health Report at pg 6

<sup>4</sup> See, 2016 Forest Health Report at pg 24

<sup>5</sup> See, 2016 Forest Health Report at pg 24

- High-severity wildfires responsible for negative outcomes are more common in unmanaged forests with heavy fuel loads than in forests that have experienced naturally recurrent, low-intensity wildfires or prior forest treatments, such as thinning. **It is far easier to keep water in a basin clean, from the source headwaters and through each usage by recipients downstream, than to try and restore water quality once it is degraded.**<sup>6</sup>

-During 2016's Beaver Creek Fire, which burned 38,380 acres northwest of Walden, foresters and firefighters were given a glimpse into likely future challenges facing wildfire suppression and forest management efforts. **These include longer duration wildfires due to the amount and arrangement of heavy fuels. Observations from fire managers indicated that instead of small branches on live trees, the larger, dead fuels in jackstraw stands were the primary driver of fire spread.... "The hazards and fire behavior associated with this fuel type greatly reduce where firefighters can safely engage in suppression operations"**<sup>7</sup>

The Colorado State Forest System has prepared an annual report on the declining forest health in the State for more than a decade and copies of these reports are available on their website. Clearly even the worst site specific issues with any trail or road will never result in impacts comparable to those impacts addressed above. These are landscape level challenges that must be addressed with landscape level management.

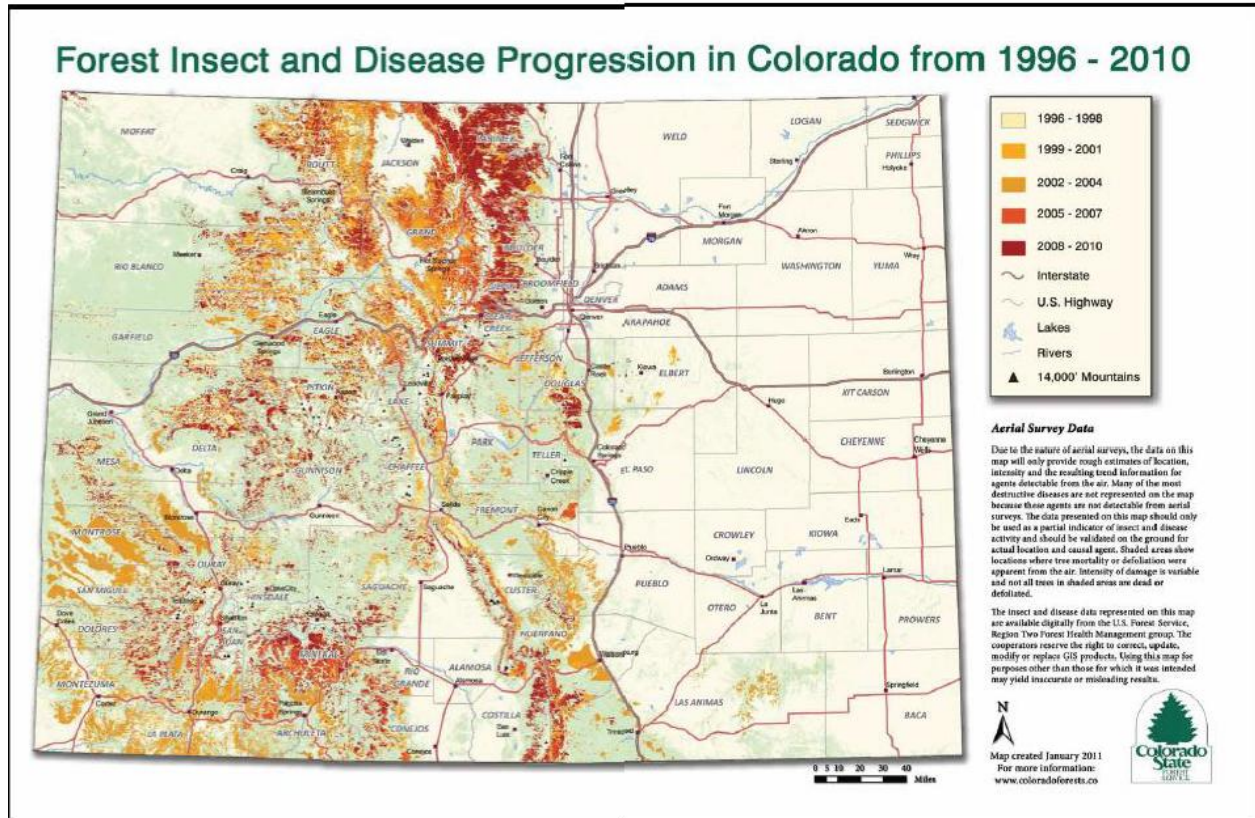
USFS research indicates there is a huge correlation between Congressionally designated Wilderness and areas hardest hit by invasive species. A copy of this research conclusions are below. Research from the Colorado State Forest Service confirms that the minimal

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<sup>6</sup> 2016 Forest Health Report at pg 24

<sup>7</sup> 2016 Forest Health Report at pg 5

management allowed for forest health in Congressionally designated Wilderness areas has dramatically impacted forest health in the GMUG planning area.



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Given the fact that 1 in 12 trees in the entire state of Colorado is dead, and based on the Organizations experience the GMUG rates of forest mortality is significantly higher than the state average and that amount is increasing rather than even stabilizing, the Organizations must be opposed to any new management standards that would make timber management more difficult or impossible. The Organizations vigorously assert that a healthy and sustainable forest is a critical component to ALL recreational activities in and around the GMUG and to the high quality of life that is associated with the communities in the planning area. The Organizations would also urge land managers to resist assertions that other smaller challenges are posing a similar scale threat to the GMUG planning area.

<sup>8</sup> See, Colorado State Forest Service; 2010 Report on the Health of Colorado's Forests Continuing Challenges for Colorado's Forests: Recurring & Emerging Threats 10th Anniversary Report at pgs 7-8.

The relationship of poor forest health and heightened restrictions on management of public lands has also been repeatedly addressed by the USFS researchers. In a Rocky Mountain Research Station report reviewing the USFS response to the bark beetle outbreak, management restrictions were clearly and repeatedly identified as a major contributing factor to the outbreak and a major limitation on the response. This report clearly stated:

- Limited accessibility of terrain (only 25% of the outbreak area was accessible due to steep slopes, lack of existing roads, and land use designations such as Wilderness that precluded treatments needed to reduce susceptibility to insects and disease).<sup>9</sup>
- In general, mechanized treatments are prohibited in designated wilderness areas. The Arapaho Roosevelt, White River, and Routt National Forests in Colorado have a combined total of over one million acres of wilderness; the Medicine Bow National Forest in Wyoming has more than 78 thousand acres. A large portion of these wilderness acres have been impacted by the current bark beetle outbreak.<sup>10</sup>
- Owing to terrain, and to budgetary, economic and regulatory limitations—such as prohibitions on entering roadless areas and designated wilderness—active management will be applied to a small fraction (probably less than 15%) of the forest area killed by mountain pine beetles. Research studies conducted on the Sulphur Ranger District of the Arapaho-Roosevelt National Forest help us understand the implications of this situation.<sup>11</sup>

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<sup>9</sup> See, USFS Rocky Mountain Research Station; "A review of the Forest Service Response: The Bark Beetle Outbreak in Northern Colorado and Southern Wyoming prepared at the request of Senator Mark Udall": September 2011 at pg i. (Hereinafter referred to as the "Udall Forest Health Report")

<sup>10</sup> Udall Forest Health report at pg 5

<sup>11</sup> Udall Forest Health Report at pg 18



With clear management concern regarding the impacts of restrictive management on the pine beetle response, the Organizations must question any restrictions on active management of GMUG resources moving forward.

Many other researchers are now recognizing the negative impacts of Congressionally designated Wilderness on Forest Health and the ability to manage these areas in response to the challenges presented by the changing climate of the planet. In a review of pine blister impacts to forests in the Bob Marshall Wilderness area, researchers again concluded that the

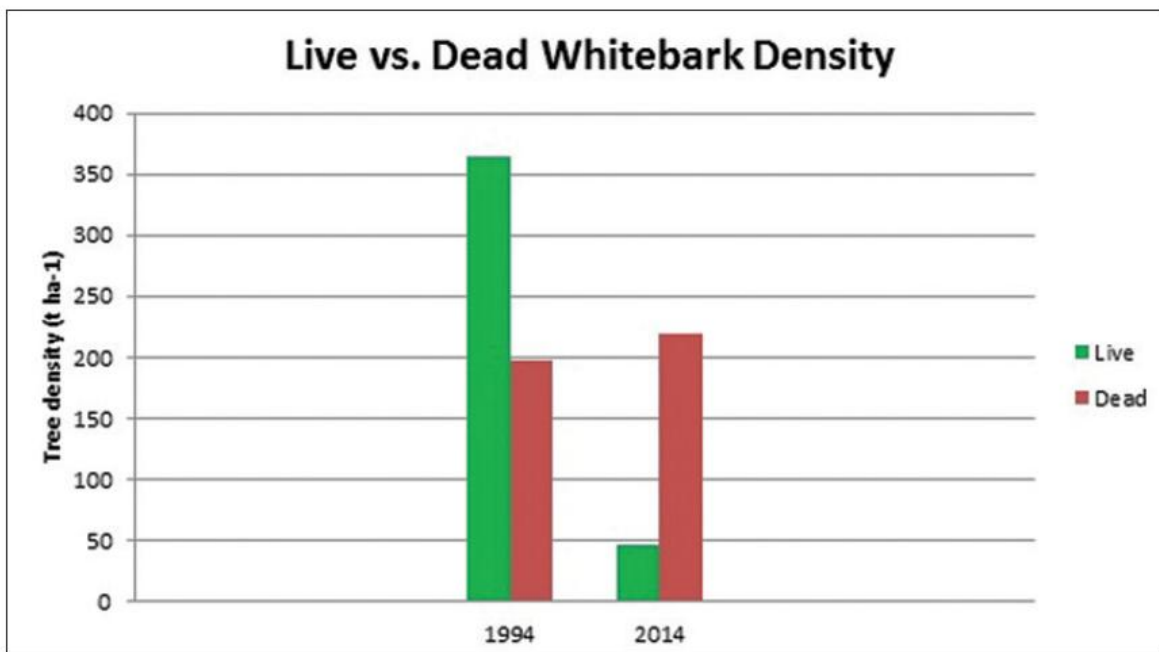


Figure 3—Live and dead whitebark pine tree density (trees ha<sup>-1</sup>) as measured on 25 plots in the Bob Marshall Wilderness Complex sampled in 1994 and 2014.

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Again these areas were much more heavily impacted than adjacent areas where management had been more active in nature. Given the clearly negative relationship between heightened management restrictions in any area and more rapid and severe impacts to forest health, the

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<sup>12</sup> Retzlaff, Molly L.; Leirfallom, Signe B.; Keane, Robert E. 2016. **A 20-year reassessment of the health and status of whitebark pine forests in the Bob Marshall Wilderness Complex, Montana**. Res. Note RMRS-RN-73. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 10 p.

Organizations must express serious concerns regarding any management in the new RMP that made addressing forest health issues more difficult.

**2a. Forest Service Budgets will continue to decline over time.**

The Organizations are intimately aware of the ongoing budgetary challenges that are facing federal land managers and the fact that the budgetary declines are not anticipated to rebound. The changing budgetary situation facing federal land managers presents a major challenge for land managers moving forward, as the Organizations are aware that often partner support is high when new facilities or routes are being constructed but also tends to wane when basic operational expenses are addressed. Land Managers consistently inform us that basic operational activity, such as maintaining routes, cleaning toilet facilities and trash removal have consistently become more expensive and now pose major challenges for managers moving forward. The Organizations believe that the RMP revision provides a great opportunity to highlight this challenge and guide site specific projects in a manner that maximizes not only the short term partner funding relied on for construction but also the long term programmatic type funding that is becoming a more important factor in providing all recreational opportunities.

**2b. USFS partnerships reports could provide high quality information on partner resources.**

With the passage of the National Forest System Trails Stewardship Act in 2016, Congress mandated the creation of a volunteer strategy report to improve partnerships between land managers and user groups for the benefit of trails on federal public lands. While this report is not to be published until 2018, this report should be highly relevant in addressing budgetary shortfalls and identifying partners where resources are more limited and partners where resources are more available as the report requires:

- " (b) REQUIRED ELEMENTS.—The strategy required by subsection (a) shall—
- (1) augment and support the capabilities of Federal employees to carry out or contribute to trail maintenance;
  - (2) provide meaningful opportunities for volunteers and partners to carry out trail maintenance in each region of the Forest Service;

- (3) address the barriers to increased volunteerism and partnerships in trail maintenance identified by volunteers, partners, and others;
- (4) prioritize increased volunteerism and partnerships in trail maintenance in those regions with the most severe trail maintenance needs, and where trail maintenance backlogs are jeopardizing access to National Forest lands; and"<sup>13</sup>

The largest single partner with both the BLM and USFS in Colorado is the motorized trail user community, both in terms of direct funding to land managers through the CPW Trails Program and with direct funding and resources from clubs in the GMUG planning area. The partnerships impact is further expanded by the fact that all motorized routes on the GMUG are available for all other recreational activities. The major barrier to partnerships is closures of routes when resources are available to address the resource concerns that are the basis of the route closure and the failure to treat all recreational user groups in a similar manner.

The identification of partner resources available to GMUG managers must be a major priority in the development of the RMP as well. While there are many partner groups who volunteer time and resources in partnership with GMUG managers, the OHV community is the only partner that provides direct and consistent funds to GMUG managers through the CPW OHV grant program to assist in achieving sustainable recreational opportunities. The USFS Regional office has clearly identified that just the OHV program in Colorado more than doubles the amount of agency funding that is available for recreational activity on USFS public lands. After a review of the CPW Statewide Good Management Crew program based in the Sulphur Ranger District of the Arapahoe/Roosevelt NF managers clearly identified that CPW OHV good management crews were provided money in a more consistent and timely manner than the funding that was provided through USFS budgeting and over time the CPW program funding had significantly increased while USFS budgets had significantly declined. There is simply no basis for a decision that this long term reduction in funding will change and this should be factored into planning for projects on the ground.

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<sup>13</sup> See, 16 USC §583k-2

In 2017, GMUG managers asked for almost \$600,000 in direct funding for annual maintenance crews and for site specific projects from the CPW OHV program alone. This funding provides three trained seasonal crews who perform on the ground trail maintenance, provide basic maintenance services for more developed sites and expand the law enforcement presence on the GMUG. Additionally, these crews are able to leverage a significant amount of mechanized equipment in the GMUG planning area, such as the several Sutter trail dozers, mini-excavators and tractors owned by local clubs to address larger maintenance challenges in a very cost effective manner. We have attached the Ouray RD good management crew grant application to the CPW OHV program (#6) and OHV dozer (#5) application as exhibits with these comments in order to provide clear documentation of the support coming from the CPW OHV program to GMUG managers and the success of these partnerships in maintaining trails.

The availability of these resources exemplifies the strong relationship that the GMUG resource managers have with some of the strongest partner clubs in Colorado, and probably the Nation including the Thunder Mountain Wheelers, West Slope ATV, Grant Mesa Jeep Club and Uncompahgre Valley Trail Riders. These clubs routinely work on projects, such as bridge construction and heavy trail maintenance, that are simply beyond the scope of comprehension on most other forests. These clubs also provide extensive additional funding for resource maintenance such as grants obtained from the Extreme Terrain Grant Program, BF Goodrich Tires Exceptional Trails and Yamaha Access grant program and Polaris TRAILS grants. This funding easily exceeds another \$100,000 per year in funding that is available to maintain routes on the GMUG and other public lands in the vicinity.

In addition to the OHV grant funding and exceptional partnerships available through summer use clubs, CPW funding through the Snowmobile Registration Program provides an additional \$500,000 in funding to local clubs for operation of the grooming programs, who maintain almost 400 miles of multiple use winter trails on the GMUG. The snowmobile registration program further partners with the local clubs to purchase grooming equipment used on these routes, which now is consistently exceeding \$200,000 to purchase used. This CPW funding is

again leveraged with exceptional amounts of volunteer and community support for these grooming programs from local clubs and often times the CPW funding is less than half the operational budget for the clubs maintaining these routes. These winter trails are the major access network for all users of GMUG winter backcountry for recreation and all these opportunities are provided to the general public free of charge.

While there has been a significant decline in direct funding through the agency budget process, motorized partners on the GMUG have been able to marshal resources at levels that are unheard of other forests for the benefit of all recreational users. The Organizations would ask that if budget constraints are identified as a challenge for recreational usage of the forest moving forward, that these constraints are applied to **all** recreational usages and that the fact that the GMUG has been the beneficiary of some of the strongest partnerships with the motorized community in the country for literally decades be properly balanced in addressing any budget shortfalls.

**3a. Growing state populations will continue to seek recreational opportunities on public lands.**

The Organizations believe that the third major challenge that will be faced by managers on the GMUG will be significant increases in the population of communities in the GMUG planning area and the expansion of utilization of GMUG opportunities by those living on the Front Range of Colorado. These new visitors to the GMUG area will continue to expect the high quality recreational opportunities that have become synonymous with the GMUG. Compounding this challenge will be the fact that USFS resources are declining slowly in terms of absolute dollars and declining far more rapidly in terms of that funding ability to address challenges on the Forest. This relationship results in a critical need for the RMP to facilitate the management and maintenance of GMUG lands in the most cost effective manner possible and avoid placing unnecessary restrictions or prohibitions on the management of areas on the GMUG.

The Colorado State Demographer estimates that the Colorado population is expanding at a rate of more than 100,000 citizens per year and will almost double by the year 2050. The Demographer breaks down this forecast as follows:

PRELIMINARY POPULATION FORECASTS BY REGION AND COUNTY, 2010 - 2050

REGIONS/Counties	SDO Est. July, 2010	SDO Est. July, 2015	SDO Proj. July, 2020	SDO Proj. July, 2025	SDO Proj. July, 2030	SDO Proj. July, 2035	SDO Proj. July, 2040	SDO Proj. July, 2045	SDO Proj. July, 2050
COLORADO	5,049,935	5,456,584	5,945,319	6,434,030	6,912,413	7,370,022	7,802,047	8,181,112	8,541,540

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The Organizations would be remiss if the relationship of the time needed to double the state population and the anticipated life span of the GMUG RMP was not raised. While Projections estimate that a large portion of the population will settle along the Colorado Front Range and not be living directly within the GMUG planning area, the Organizations submit that these residents will still seek out the high quality recreational opportunities that have become synonymous with Colorado. The Organizations believe that the RMP should strive to maintain current levels of access and meaningfully address areas where recreational access can be expanded in order to address this expanded usage in a thoughtful manner that protects resources and provides opportunities. Failing to address this expanding demand will not stop the population from visiting public lands but rather will result in low quality opportunities being provided and resources being impacted as a result of the lack of planning.

**4. The Gunnison Public Lands Initiative is not supported by the motorized community and would result in negative impacts to the three criteria identified as management challenges on the GMUG moving forward.**

The Organizations feel compelled to address the scope of a recent public lands initiative that has been in development for several years as we believe this will become an avenue to try and direct management of specific areas on the GMUG during the RMP revision. The timing of the GMUG RMP revision and the development of the public outreach portion of this project simply cannot be overlooked as is more than a mere coincidence.

<sup>14</sup> See, Colorado State Demographer" Preliminary Population Forecasts by region and county " September 2016. A complete version of these projections, assumptions and other supporting documentation is available here: <https://demography.dola.colorado.gov/demography/publications-and-presentations/#publications-and-reports>

The motorized community has participated in the development of the Gunnison Public Lands Initiative(GPLI) but vigorously assert the GPLI needs significant addition development before being a document that our user group could support if only based on motorized recreational interests. There are numerous important riding areas that remain at risk of loss in the Proposal specific recommendations . This position is directly contrary to much of the press information being provided which is touting diverse support for the proposal and prominently displays a motor vehicle on the cover that is being provided around this project. The Organizations would note that the most vigorous supporters of the Proposal are Organizations that are not losing any opportunity areas.

We cannot support the current version of this Proposal due to the negative impacts to multiple use recreation and the numerous new barriers it would put in place to addressing the poor forest health of these areas in a cost effective manner. The Organizations anticipate any discussion of addressing would result in significant revision of the legislation to develop something we could support.

**5. Summer recreational usage should be limited to designated routes for all user groups.**

There are significant discussions occurring around moving other user groups to a designated trail system for recreation in a manner similar to the process that has been applied to summer motorized usage. The Organizations do not support moving to an entirely designated trail system in the winter due to the fact that summer and winter recreation are significantly different given the buffer provided by snowfall between the recreational activity and the resources that are buried in the snow. Large open riding areas are strongly preferred by the winter motorized users and this is a viable management position due to the buffer between resources and recreational activity provided by snow. These issues are discussed more in depth later in these comments.

The Organizations would support moving other summer user groups to a designated network of roads and trails, as many of these user groups face resource challenges similar to those identified in a poorly maintained motorized network. While the motorized community has become a strong partner with GMUG managers in addressing these challenges, other user groups have failed to adopt this "pay to play" model and as a result resources are not available to remedy possible impacts. The Organizations believe that moving everyone to a designated trail system would allow a more complete leveraging of resources and improve recreational opportunities in the long run due to minimized resource impacts.

A large number of adjacent planning offices such as the BLM Grand Junction Field Office, Colorado River Valley Field Office, Dominguez-Escalante National Conservation Area, the White River National Forest, the San Juan National Forest and the Tres Rios Field Office have moved many user groups to a designated route system in order to protect resources and stretch the ever reducing federal funds available to maintain recreational opportunities. The Organizations believe that consistency of the planning offices will be highly valuable in educating users of these changes and leveraging resources.

Moving other users, such as mountain bikers, to a designated route system would reduce user conflict. Often the members of the motorized community are highly frustrated that other users are allowed to "ride in" trails in areas with little to no management oversight simply due to the fact that such practices remain legal in most areas. Frustration of members of the motorized user community increase as often these routes are blamed on the motorized community, who is then obligated to remediate possible impacts to resources that result from this unmanaged recreation. This should be avoided.

#### **6. OHV recreation is a major economic driver for local communities.**

The Organizations would also like to provide new information on the economic impact of OHV recreation to the local communities in and around the GMUG planning area. COHVCO has



partnered with the USFS, BLM and CPW in order to develop an entirely new analysis of the economic contribution of OHV recreation in the State of Colorado. A complete study of this 2014-2015 study is submitted with these comments as Exhibit 3. This new research concluded that more than \$2.3 billion in total economic contribution to the Colorado economy results from OHV recreation. This economic contribution results in more than 16,500 jobs and more than \$250 million in tax revenue to local communities in the State. A more detailed breakdown of this contribution is provided below.

**Table ES-2. Total Economic Contribution of Off-Highway Vehicle Recreation in Colorado for the 2014–2015 Season**

Type of Impact	OHVs	Snowmobiles	4WDs	Total Economic Contribution
Total Gross Sales	\$1,306,690,117	\$118,517,904	\$370,607,827	\$1,795,815,847
Jobs	12,403	1,150	3,200	16,753
Labor Income	\$489,783,466	\$44,845,462	\$137,232,373	\$671,861,301
Value Added or Gross Regional Product	\$753,200,500	\$70,050,239	\$217,123,900	\$1,040,374,639
State and Local Business Taxes	\$76,484,748	\$7,846,388	\$22,860,939	\$107,192,074
Federal Business Taxes	\$114,827,234	\$10,509,271	\$32,590,274	\$157,926,779

OHV recreation in the GMUG planning area results in more than \$340 million in economic contribution, almost 3,000 jobs in local communities and more than \$56 million in tax revenue to communities that often struggle to provide basic services, such as schools and road maintenance to residents. A full breakdown of this information is provided on pg 18 of the complete study.

This research also identifies that the Central Colorado region, encompassing a large portion of the GMUG planning area is the largest destination for both Colorado residents and non-residents seeking OHV opportunities. This information will be highly relevant in addressing the

public demand for opportunities in the ever expanding Colorado population seeking to obtain high quality recreational opportunities.

**Table 4-2. Trip Percentages by Region for Residents**

Region	Snowmobiles	OHVs	4WDs
Northwest	18.6%	6.7%	4.2%
Southwest	11.9%	21.6%	23.2%
South-Central	11.2%	14.8%	5.9%
Central	38.8%	35.4%	33.8%
North-Central	18.0%	8.3%	3.9%
Eastern Colorado	1.5%	13.3%	19.0%

**Table 4-3. Trip Percentages by Region for Non-Residents**

Region	Snowmobiles	OHVs	4WDs
Northwest	8.9%	1.0%	1.6%
Southwest	26.7%	36.3%	52.7%
South-Central	44.4%	27.0%	14.5%
Central	15.6%	30.4%	26.3%
North-Central	4.4%	1.0%	1.6%
Eastern Colorado	0.0%	4.2%	3.2%

Group spending profiles for the motorized community are some of the highest in the recreational community and that winter motorized users spend at an amount similar to that of the developed downhill skiing community. This research indicates that motorized user groups spend at a minimum \$221 per day when taking a day trip and up to \$2,300 for groups going overnight more than 50 miles from home and these conclusions are supported by detailed itemized information to support the spending conclusions.<sup>15</sup>

The Organizations are aware that there are a growing number of cursory studies addressing the economic contribution of other users of public lands. The Organizations welcome this

<sup>15</sup> See, COHVCO study at pgs 23-24.

additional information on the economic contribution of other forms of recreation but would also urge planners to review some of this research very closely as much of the underlying research has not been peer reviewed and is often not fully vetted or consistent with usage on the GMUG. Our concerns on this issue would be exemplified by the fact that users frequently identify a Whisler BC mountain bike study to support the fact that the mountain biking community spends at similar levels to the motorized community. These conclusions are entirely inconsistent with both COHVCO research and the USFS own research on these issues, which concludes that the bicycle community only spends 50% of what a similar motorized user spends.<sup>16</sup> The Organizations don't contest the conclusions on the developed ski area but would note that this profile is only relating to mountain bikers at a developed ski area utilizing ski area resources, such as lift passes is probably not highly relevant to areas where these highly developed resources are not available. Again planners must insure that any information relied on for management decisions is high quality, reviewing a similar activity to the one being reviewed on the GMUG and is basically relevant to the discussion being had.

**7. Document reviews from anti access groups addressing wildlife concerns with motorized recreation must be critically reviewed.**

Up to date science *must* be relied on in the development of the RMP and that survey documents created by user groups opposed to multiple use are not a substitute for best available science. This is an issue we are forced to address in our comments as we are aware of several documents that have been circulated under the guise of best available science that are far from a planning resource but rather appears to desire to address travel management without regard to other management challenges or the priority threats on the issue. The Organizations would be remiss if the reliance on the works of Switalski asserted to be “Best Management Practices for OSV management” was not specifically addressed. While there are numerous anti-access organization science summaries in circulation, the Winter Wildlands

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<sup>16</sup> See, Stynes and White; Updated Spending Profiles for National Forest Recreation Visitors by Activity; JOINT VENTURE AGREEMENT BETWEEN THE USDA FOREST SERVICE PACIFIC NORTHWEST RESEARCH STATION and OREGON STATE UNIVERSITY; September 2010 at pg 6.

Alliance ("WWA") brochure appears to be the most common right now and targeting winter recreation only but is too often applied to all recreational activity.

The Organizations are intimately familiar with this document as it is readily available on the Winter Wildlands website<sup>17</sup> and it has been embraced as best available science in several other planning documents. This is simply astounding as WWA is a propaganda document created by those opposed to multiple use recreation, rather than a survey of best available science on the issue and the Organizations submit that this is exactly the type of document that must be strictly reviewed by planners. Representatives of the Organizations have attempted to discuss our concerns about the basic validity of the document with WWA representatives and have not had any success. We have included the American Council of Snowmobile Associations 2014 "Facts and Myths about Snowmobiling on Winter Trails" booklet as Exhibit 4 to these comments, in order to provide a complete background of all research on OSV travel in an timely and balanced manner. This document is a result of years of effort and a genuine interest in accurately reflecting the management issue and scientific research at the time of publication and often directly reflects the position of the USFS or USFWS on issues in order to provide a single point of reference on agency position.

A cursory review of the Switalski/WWA document quickly identifies best management practices standards that were BADLY out of date at the time the document was published in 2015. The Organizations submit that the grim picture of multiple use recreation portrayed in this document is provided in an attempt to pull the range of alternatives towards closing routes. After a review of the booklet, the Organizations believe this document to be an attempt to move their Organizations mission of "snow less traveled" than a true survey of best available science on many issues as many studies have been repeatedly superseded or completely inaccurately summarized in this work. The Organizations believe a complete review of best available science and the position conveyed in the WWA brochure on each issue is not warranted but the Organizations believe several examples of the quality of low quality

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<sup>17</sup> See, Winter Wildlands Alliance website at <http://winterwildlands.org/wp-content/uploads/2015/06/BMP-Final.pdf>. (Hereinafter referred to as the "WWA booklet")

information or badly outdated nature of the information provided in this document are sufficient to substantiate our inclusion of this issue in our comments. The Organizations believe that the first step in developing truly effective management of any issue is establishing the landscape level summary of the threats and challenges for the species, as many factors are heavily influenced by activities that are totally unrelated and beyond management by the USFS. Overly restrictive management on public lands can directly undermine species management efforts being undertaken in partnership with private lands interests.

The first relevant example of outdated and misleading and questionably relevant information being provided in the WWA brochure involves OSV emissions. The EPA is an Agency that has been specifically developed to address vehicle emissions and air quality and the USFS should not be addressing these types of issues in travel planning, as the USFS expertise is not in air quality and emissions standards. If the units are in compliance with EPA standards that should be the end of the USFS interest in emissions for vehicles. The Organizations vigorously assert that landscape level standards are that all units being produced and used in Colorado are well below EPA requirements for these types of vehicles. Additionally EPA and partner analysis find that localized air quality issues are totally unrelated to OSV travel further drawing the relevance of this information into question for travel management purposes. The WWA brochure provides the following information without any basis for comparison to other activities:

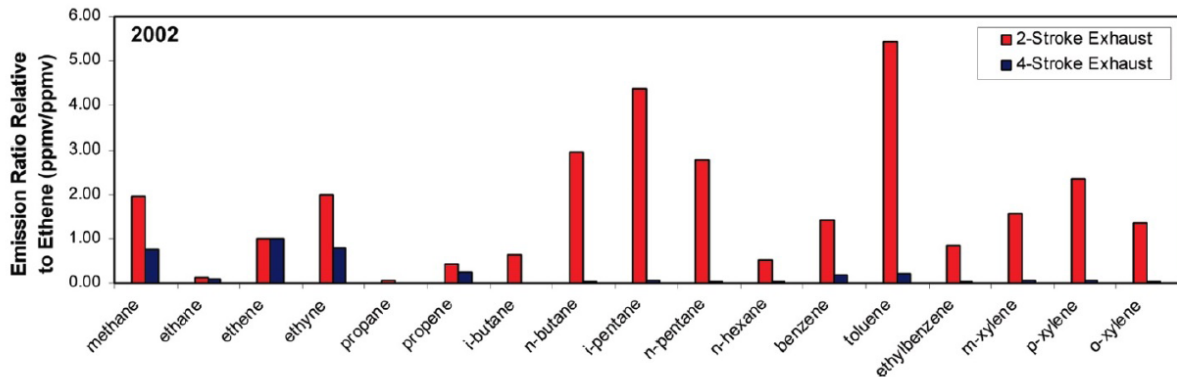


Figure 4: Average nonmethane hydrocarbons exhaust emission ratios relative to ethene (ppmv/ppmv) for two-stroke and four-stroke engines in 2002 (Reprinted with permission from (Zhou, Y., D. Shively, H. Mao, R.S. Russo, B. Pape, R.N. Mower, R. Talbot, and B.C. Sive. 2010. Air toxic emissions from snowmobiles in Yellowstone National Park. *Environmental Science and Technology* 44(1): 222-228. Copyright 2010 American Chemical Society)

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This information might have been minimally informative to land managers in the decision making process in 2002 but have to question the value of this information decades later, as the overwhelming percentage of 2002 snowmobiles simply are no longer in use. Newer snowmobiles are more cost effective to ride, more reliable and operate in full compliance with EPA air quality requirements, which have reduced the number of emissions from this class of vehicle by more than 100%. The 2012 EPA standards for OSV travel are reflected in the following air quality standards:

### EPA Snowmobile Emission Standards

Model Year	Emission Standards		% of Fleet Phase-In
	HC g/kW-hr	CO g/kW-hr	
2002 baseline 2-stroke snowmobile	150	400	NA
2006	100	275	50%
2007 – 2009	100	275	100%
2010	75	275	
2012	75	200	

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<sup>18</sup> See, WWA booklet at pg 7.

Any snowmobile manufactured after 2012 may only produce ½ the emissions that a 2002 unit was allowed to produce. The Organizations are aware that most new units are producing emissions far below even EPA standards for these types of vehicles. The Organizations have to question the relevance of any emissions information for vehicles that were produced more than a decade ago and are no longer used. Again the Organizations must question if assertions regarding the relevance of 2002 emissions outputs decades after those emissions standards have been superseded is truly relying on best available science. An additional question could be raised on this issue, mainly since pollution appears to be asserted to be the basis for travel management closures, does the fact that 2017 equipment produces more than 50% less emissions than similar 2002 equipment mean areas should now be opened? Clearly such a question has no place in travel management analysis regardless of the direction of the question.

This is not the only time that severely limited or questionably relevant information is provided in the WWA brochure. The WWA brochure also provides summaries of Water/Air Quality studies that are inaccurate at best and are sometimes simply erroneous. An example of such a summary involves the Musselman study, which the WWA brochure attempts to summarize as follows:

"During the winter, snowmobiles release toxins such as ammonium, nitrate, sulfate, benzene, and toluene which accumulate in the snowpack (Ingersol 1999), and increase acidity (Musselman and Kormacher 2007)."<sup>20</sup>

Any summary of the Musselman work which attempts to support such a position is misleading and frustrating to the snowmobile community, as the snowmobile community partnered in the development of this study in an effort meaningfully address issues and develop parking facilities at the study location. The Musselman study clearly stated their conclusions as follows:

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<sup>19</sup> See, Fact and Myths book at pg 7&8.

<sup>20</sup> See, WWA brochure at pg 12.

“Seasonal differences were evident in air chemistry, specifically for CO, NO<sub>2</sub>, and NO<sub>x</sub>, but not for NO or O<sub>3</sub>. NO<sub>2</sub> and NO<sub>x</sub> were higher in summer than winter, while CO concentrations were higher in winter than summer. Nevertheless, air pollutant concentrations were generally low both winter and summer, and were considerably lower than exceedence levels of NAAQS.”<sup>21</sup>

“Nevertheless, an air pollution signal was detected that could be related to snowmobile activity; but the pollutant concentrations were low and not likely to cause significant air quality impacts even at this high snowmobile activity site.”<sup>22</sup>

The Organizations have never asserted that motors used for OSV recreation do not produce certain levels of emissions, as that would simply be insulting to all parties involved. Rather researchers have asserted these issues are very minimal in nature when addressing any landscape level emissions that might be in an area, as these new units are EPA compliant. Even when OSV emissions are addressed locally, they are found to be insufficient to warrant any further monitoring. If air quality is an issue that should be addressed at the landscape level, the Western Slope planning area is generally well within air quality standards for the EPA and Colorado Department of Public Health.<sup>23</sup> Any air quality concerns on the Western Slope are localized and related to particulate matter being released from wildfires in the vicinity. This issue again highlights the value of identifying a limited number of threats on the GMUG, such as poor forest health, as these factors can insure that limited resources are directed to poor forest health and subsequent wildfires rather than OHV/OSV emissions.

A second example of the misleading use of science in the WWA booklet involves lynx management standards and again provide a stark example of the systemic usage of out of date information in the WWA brochure. Lynx management is an issue the Organizations have now partnered with CPW/USFS and USFWS in addressing for more than decade and now have

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<sup>21</sup> See, Robert C. Musselman & John L. Korfmacher; USFS Air Quality at a snowmobile staging area and snow chemistry on and off trail in a rocky mountain subalpine forest, Snowy Range Wyoming. 2007 at 332

<sup>22</sup> See, Musselman at 333.

<sup>23</sup> See, <https://www.colorado.gov/airquality/report.aspx>



significant time and resources vested into in an attempt to insure best available science on since reintroduction of the lynx in Colorado. This support has taken a wide range of efforts including some direct donations of resources, significant support such as fuel oil and equipment retrieval in the backcountry.

The WWA brochure clearly asserts that "no net gain" remains the rule for OSV travel in lynx habitat, stating as follows:

"The Canada Lynx Assessment and Conservation Strategy set planning standards on Forest Service lands that include, "on federal lands in lynx habitat, allow no net increase in groomed or designated over-the-snow routes and snowmobile play areas by Lynx Analysis Unit... and map and monitor the location and intensity of snow compacting activities that coincide with lynx habitat, to facilitate future evaluation of effects on lynx as information becomes available" (USDA FS 2000, p.82)."<sup>24</sup>

This was a relevant summary of research in 2000, as research on the lynx was exceptionally limited in 2000 and "no net gain" was temporarily relied on for management of these areas. Research in 2000 on this issue was more aptly summarized as identifying the numerous gaps in research rather than a peer reviewed body of science to develop a management plan. ***As these gaps in research were resolved, new management guidelines were periodically released for management of lynx habitat and as a result the 2000 LCAS has been superseded by the Southern Rockies Lynx Amendments in 2008 and the 2013 release of the updated Lynx Conservation Assessment and Strategy, which was signed and developed in partnership with the USFS.*** A complete copy of this document is attached to these comments as Exhibit 5. These management documents have clearly moved away from the "no net gain" standard and towards a truly science based management structure. The 2013 LCAS specifically addresses new research on many recreational issues as follows:

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<sup>24</sup> See, WWA Brochure at pg 11.

- The 2013 LCAS specifically and clearly superseded all previous planning documents and clearly states that the 2013 LCAS is now the definitive planning document for lynx issues in federal land planning;<sup>25</sup>
- Recreational usage of lynx habitat is a second level threat and not likely to have substantial effects on the lynx or its habitat. Previous theory and management analysis had placed a much higher level of concern on recreational usage of lynx habitat;<sup>26</sup>
- Lynx have been known to incorporate smaller ski resorts within their home ranges, but may not utilize the large resorts. Dispersed motorized recreational usage certainly does not create impacts that can be equated to even a small ski area;<sup>27</sup>
- Road and trail density does not impact the quality of an area as lynx habitat;<sup>28</sup>
- There is no information to suggest that trails have a negative impact on lynx;<sup>29</sup>
- Snow compaction from winter recreational activity is not likely to change the competitive advantage of the lynx and other predators;<sup>30</sup>
- Snow compaction in the Southern Rocky Mountain region is frequently a result of natural process and not recreational usage;<sup>31</sup>
- Winter recreational usage of lynx habitat should only be "considered" in planning and should not be precluded given the minimal threat this usage poses to the lynx; and<sup>32</sup>
- Failing to manage habitat areas to mitigate impacts of poor forest health issues, such as the spruce and mtn pine beetle, is a major concern in lynx habitat for a long duration.<sup>33</sup>

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<sup>25</sup> See, Interagency Lynx Biology Team. 2013. *Canada lynx conservation assessment and strategy. 3rd edition.* USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT at pg 1. (Hereinafter referred to as the 2013 LCAS)

<sup>26</sup> See, 2013 LCAS at pg 94.

<sup>27</sup> See, 2013 LCAS at pg 83.

<sup>28</sup> See, 2013 LCAS at pg 95.

<sup>29</sup> See, 2013 LCAS at pg 84.

<sup>30</sup> See, 2013 LCAS at pg 83.

<sup>31</sup> See, 2013 LCAS at pg 26.

<sup>32</sup> See, 2013 LCAS at pg 94.

<sup>33</sup> See, 2013 LCAS at pg 91.

The conflict between the 2000 LCAS relied on in the Winter Wildlands brochure and accurate up to date management standards clearly provided in the 2013 LCAS is immediately apparent, and not addressing this conflict would possibly allow a plan to be developed based on badly out of date information and research. Given that the WWA/Switalski document was not released until 2 years after the release of the 2013 LCAS, there was more than enough time to provide accurate information in the WWA/Switalski survey. The Organizations submit that the failure to reflect best available science on the lynx casts a shadow over the reliability of the entire document.

Since the release of the 2013 LCAS, Colorado Parks and Wildlife has also explicitly addressed Canadian Lynx issues in Colorado, which have resulted from the successful reintroduction efforts of the lynx in Colorado as follows:

"Lynx have successfully been re-established in Colorado and a self-sustaining population is believed to persist in the region. The management actions taken to re-establish the population to Colorado were done considering the landscape of the time – there is no intention of attempting to change, alter or remove historic and current land uses from the landscape. Many of these industries can and have developed practices that have the potential to allow the long term persistence of the lynx within the context of existing land use."<sup>34</sup>

Given these clear statements from both Federal and State species management experts that OSV/OHV usage is not impacting the Canadian Lynx and that there should not be any changes in land use as a result of lynx activity and position that closing any area to OSV/OHV would benefit the Canadian Lynx would be inaccurate and conflicting with best available science.

A third example of the misleading usage of science in the WWA document involves a comparison of the Wolverine management standards from the USFWS and the WWA brochure,

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<sup>34</sup> See, 2015 CPW State Wildlife Action Plan at pg 173.

which again provides evidence of the lack of scientific basis for much of the WWA brochure. The WWA brochure summarizes Wolverine management standards as follows:

"Key management schemes for protecting wolverine include limiting disturbance and retaining and restoring habitat connectivity. Managers can reduce the potential conflict with snowmobiles and wolverine by identifying areas of overlap and managing accordingly."<sup>35</sup>

This management position simply cannot be reconciled with recent USFWS listing decisions regarding the Wolverine that convey a very different standard for the management of recreational activities in Wolverine habitat. USFWS management specifically states:

"there should be no changes to forest management as the result of an area being designated as habitat".<sup>36</sup>

While there was concern regarding the climate change being identified as the primary threat to the Wolverine in the most recent listing decision that ended in determination that the Wolverine was not warranted for listing as threatened or endangered, no concerns were registered regarding the accuracy of these management position that was taken with regard to general forest management standards. Given the clarity of these USFWS statements, the Organizations again are concerned that best available science has not been relied on for the development of the WWA brochure. Awareness of the lack of basic accuracy in the WWA document is critical in establishing a high quality science based RMP for the GMUG.

**8. Land managers must be aware of the severely checkered past performance of those proposing best management practices.**

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<sup>35</sup> See, WWA Booklet at pg 11.

<sup>36</sup> USFWS summary fact sheet available here

<http://www.fws.gov/idaho/Wolverine/WolverineProposed4dRule031113.pdf>

As noted in the previous sections of these comments, there are serious conflicts between what is recognized as best available science on numerous issues and that being provided from user groups who are proposing best management practices for users outside their interest group. The basic concern for these standards is not limited to a lack of scientific basis, but also extends to the implementation of social values as part of the BMPs. It is unfortunate that these documents are not the first time BMP's have been proposed based on inaccurate science and the Organizations believe that understanding the exceptionally poor response and immediate user conflict that resulted when the USFS moved to adopt these BMP's will be critical in avoiding creation of an institutional user conflict in the GMUG RMP.

Adam Switalski, the author of the WWA Booklet, has proposed OHV management BMP's previously which were adopted by the USFS as Appendix D of the "Comprehensive Framework for Off-Highway Vehicle Trail Management". The Organizations have enclosed relevant portions of this guide and related documents as this guide was **immediately withdrawn** by the USFS when vigorous public opposition to the BMP's was voiced.<sup>37</sup> The Framework is not locatable on the internet currently to our knowledge. The Organizations would be remiss if the huge levels of overlap between the BMP's in the Framework and WWA Booklet were not addressed both from a scientific and social aspects. While the framework BMPs targeted all multiple use recreation, the implementation of the WWA Booklet BMPs for a smaller subset of the multiple use community is no more acceptable to the Organizations.

This overlap starts with the fact that both documents were published in the same scientific journal and given the immediate vigorous response to the original BMP's, the Organizations would question why any journal would not review any further articles with a high level of scrutiny. Additionally, many of the same standards are again proposed to be best management practices for multiple use recreation. A few examples of the significant overlap of socially based standards are as follows:

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<sup>37</sup> See, Exhibit 6 to these comments.

- Both publications assert motorized usage should be prohibited in a proposed Wilderness Area;
- both attempt to tie multiple use recreation to management challenges unrelated to multiple use, such as the impairment of water quality;
- require multiple use only occur in areas with a trail density of less than 1 mile per square mile;
- both provide identical offset distances for watershed related issues; and
- a blanket prohibition of multiple use in areas identified as habitat for endangered or sensitive species.

While the verbiage of the BMP's is clearly more polished in the WWA booklet, the BMP's that were the basis of the immediate user conflict have not changed. Often standards are provided with absolutely no basis for the standard, such as 1 mile per square mile standard or are standards that conflict with best available science or are standards, such as the prohibition of motorized usage in WSA areas, where historical usages are specifically recognized and protected by federal law.

The Organizations believe that avoiding the vigorous user conflict that resulted immediately from adoption of the BMP's from Mr. Switalski by the USFS nationally in the GMUG RMP revision. Implementation of socially based management standards is no more acceptable at the forest level than it was at the national level. The Organizations submit that if there is truly an issue to be resolved, the motorized community has a long and proud history of partnering with GMUG managers to resolve the issue. Inadvertent implementation of management BMP's that are not soundly based would negatively impact this partnership and should be avoided and a full awareness of the history of all proposals is a critical component of avoiding these negative impacts.

**9. The minimization criteria in the 2005 Travel Rule require goals and objectives of the forest plan to be created before moving to travel management analysis.**

There is a significant amount of information of again questionable accuracy and public pressure from a small vocal group being applied to planners regarding the minimization criteria of the Travel Management Rule. This is exemplified by The Wilderness Society documents entitled "*Achieving Compliance with the Executive Order "Minimization Criteria" for Off-Road Vehicle Use on Federal Public Lands: Background, Case Studies, and Recommendations and Travel Analysis Best Practices: A Review of Completed Travel Analysis Process Reports.*" We are aware that this document has been submitted in numerous forest planning efforts and as a result we are forced to assume that this document has been submitted to the GMUG.

Again this document much be approached with a great deal of caution by planners, as it fails to address relevant decision documents and legislation in what appears to be an attempt to support a position that the USFS has never accepted. Rather than recognizing that the Forest Plan must set the goals and objectives for management of areas BEFORE minimizing any impacts, this document would reverse this relationship and require a complete minimization of impacts and Forest Plans then being tailored to this goal. All relevant versions of the Travel Rule clearly require minimization of possible impacts to achieve the goals and objectives of the Forest Plan. The most recent version of the Travel Management Rule EO 11644, clearly states as follows:

**"Sec. 3. Zones of Use.** (a) Each respective agency head shall develop and issue regulations and administrative instructions, within six months of the date of this order, to provide for administrative designation of the specific areas and trails on public lands on which the use of off-road vehicles may be permitted, and areas in which the use of off-road vehicles may not be permitted, and set a date by which such designation of all public lands shall be completed. Those regulations shall direct that the designation of such areas and trails will be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of

those lands. The regulations shall further require that the designation of such areas and trails shall be in accordance with the following--

(1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.

(2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.

(3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

(4) Areas and trails shall not be located in officially designated Wilderness Areas or Primitive Areas. Areas and trails shall be located in areas of the National Park system, Natural Areas, or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values.

(b) The respective agency head shall ensure adequate opportunity for public participation in the promulgation of such regulations and in the designation of areas and trails under this section.

(c) The limitations on off-road vehicle use imposed under this section shall not apply to official use."

While the Wilderness Society documents attempt to provide a compelling legal argument that minimization criteria requires minimization of all impacts, this simply is not the case and the USFS specifically declined to apply this standard in the 2005 Travel Rule. In the response to public comment to the 2005 Travel Rule the USFS planners clearly address this position as follows:



*Response.* The Department has retained the proposed language, “the responsible official shall consider effects on the following, with the objective of minimizing,” in the final rule. The retained language is mandatory with respect to addressing environmental and other impacts associated with motor vehicle use of trails and areas. The Department believes this language is consistent with E.O. 11644 and better expresses its intent. It is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. **An extreme interpretation of “minimize” would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands. Neither E.O. 11644, nor these other laws and policies, establish the primacy of any particular use of trails and areas over any other.** The Department believes “shall consider \* \* \* with the objective of minimizing \* \* \*” will assure that environmental impacts are properly taken into account, without categorically precluding motor vehicle use.

Section 212.55(c). This section of the rule contains specific criteria for designation of roads.”<sup>38</sup>

This is also a position that the USFS has litigated and won. In addition to completely failing to reflect relevant Executive Orders and related agency analysis, these documents frequently operate on the assumption that roads are the only threats on public lands and the only way to address an impaired stream is through route closure. Such a position is facially faulty as the position fails to answer a critical question, mainly *“Why is stream health impaired?”*. These are foundational questions to developing a forest plan based on science. Too often on the GMUG poor water quality is the result of mine related discharges, high levels of particulates resulting

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<sup>38</sup> See, Department of Agriculture; US Forest Service; 36 CFR Parts 212, 251, 261, and 295 Travel Management; Designated Routes and Areas for Motor Vehicle Use; Final Rule; Federal Register /Vol. 70, No. 216 /Wednesday, November 9, 2005 /Rules and Regulations 68281

from the stream traveling over highly erosive soils or the proximity of the stream to an area that has been impacted by Wildfire. None of these challenges to water quality will be addressed with route closures, and closure of routes to mines in need of remediation may actually further impair basic maintenance and oversight of a compromised mine site.

The Wilderness Society further clouds other management issues such as aquatic species either listed or proposed to be listed as Endangered or Threatened. Again the Wilderness Society analysis provided in the documents identified above fails to identify a critical question of *"What is the primary threat to the species?"* and simply moves to the assumption that routes are the primary threat to the species. There is simply no basis for this position in the ESA and again directly conflicts with science based planning requirements in federal regulations. Such a position is not supported by best available science as the US Forest Service's Rocky Mountain Research Station recently released extensive analysis of the effectiveness of travel management restrictions on addressing sensitive species issues at the landscape level. These conclusions specifically found that travel management was not effective in addressing many species related issues. The Research Station conclusions specifically stated as follows:

"Actions such as limiting grazing or closing OHV trails have historically been some of the primary tools used by land managers in southern Nevada to reduce the effects of anthropogenic stressors on species of conservation concern..... It is evident from this body of research that very little is known about the relative threats posed to, or the mitigation actions needed to protect, virtually any species, except perhaps the desert tortoise. Too often research jumps immediately to mitigation strategies without first determining what specific factors pose the greatest threats and are the most important to mitigate. In addition, the evaluation of potential threats typically focuses upon the usual anthropogenic suspects (e.g. OHVs, livestock grazing, invasive species, and climate change) without first carefully considering which factors are most likely to pose the greatest threats." <sup>39</sup>

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<sup>39</sup> See, USDA Forest Service, Rocky Mountain Research Station; *The Southern Nevada Agency Partnership Science and Research Synthesis; Science to Support Land Management in Southern Nevada; Executive Summary*; August 2013 at pg 38.

These general management positions regarding the effectiveness of travel management in addressing sensitive and endangered species issues are supported by specific analysis of GBCT threats. The 2009 FWS listing decision does identify trails usage as a "threat" but only a low level threat, as follows:

"Low level threats include the ongoing negative effects of past mining operations on water quality; the impacts of grazing, logging, and road and trail construction and use on riparian habitat and streambanks, causing increased erosion, sediment deposition, and in turn elevated water temperatures and higher turbidity; and the co-occurrence of nonnative salmonids with greenback populations."<sup>40</sup>

The 5 year listing decision specifically states that land managers have a significant amount of latitude in addressing these low level threats to the trout. The listing decision recommended management of this issue as follows:

"Regulatory and land management agencies have the ability to improve habitat conditions and eliminate or minimize these threats by... by implementing conservation measures to avoid streamside habitat degradation while approving new grazing, logging, and road and trail construction proposals; by moving existing roads and trails away from streamside habitats and rehabilitating disturbed riparian habitats;..... All of these positive activities are ongoing throughout the subspecies' range and are implemented based on agency priorities and funding levels on an annual basis."<sup>41</sup>

Management of sensitive trout species has occurred in habitat areas where there are extensive but properly managed routes and trails available and researchers have specifically found that:

"[s]tudy streams were accessible by road or trail and generally supported good to excellent habitat conditions."<sup>42</sup>

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<sup>40</sup> See, USFWS 5 year listing decision at pg 34

<sup>41</sup> See, USFWS 5 year listing decision at pg 34-35.

<sup>42</sup> See, McGrath and Scott; *Length Variation in Age-0 Westslope Cutthroat Trout at Multiple Spatial Scales*; North American Journal of Fisheries Management 28:1529–1540, 2008 at pg 1531.

Given the explicit nature of this statement, clearly recreational usage and trout habitat designations are not mutually exclusive designations as are proposed by the Wilderness Society documentation. Clearly these management standards cannot be summarized as a high priority management tool or requiring closure of any habitat areas to recreational usage.

The relationship of aquatic species and road management exemplifies the high value that could result from identifying a limited number of major challenges in the GMUG planning area moving forward in order to provide a quick confirmation of management decisions on these issues. Poor forest health is clearly a high priority concern for the GMUG moving forward and fire is specifically identified as a disturbance that results in trout habitat being unsuitable for centuries. This relationship has been clearly stated in Conservation Assessments stating:

“In particular, disturbances that dramatically alter channels or riparian zones—debris torrents...and severe fires—will change the discharge-sediment transport regime, re-set forest succession and large wood dynamics, and redistribute suitable and unsuitable habitat in a basin, sometimes for decades or centuries...”

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Again the Organizations must stress that species decline and roads and trails in a habitat area are completely unrelated when best available science on the issue is reviewed drawing into question the basic premise of minimizing routes to protect a trout species.

The Organizations vigorously assert that the tremendous pressure that is often applied to land managers in an attempt to improperly apply the minimization criteria must be resisted as a complete review of previous USFS decisions and relevant regulations require any forest plan to balance multiple uses of public lands in the planning process before addressing a minimum road network necessary to achieve the goals and objectives of the forest plan. The balancing of multiple uses is a critical step in insuring the economic stability of local communities in the GMUG planning area that are now overly reliant on the GMUG for the basic sustainability of the

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<sup>43</sup> See, Dr Michael Young; *Greenback Cutthroat Trout; A technical Conservation Assessment; February 6, 2009* at pg 21.

community moving forward. Land managers must insure that any management decision actually addresses the "why?" of the issue rather than simply moving to a position that roads and trails are the primary reason for every decline on public lands. Not only does this insure the limited resources of managers are most effectively applied to primary challenges to any issues but effective management builds partnerships to address issues in the future.

#### **10. The Colorado Roadless Rule must be accurately applied in the GMUG RMP.**

The Organizations submit that the development of the Colorado Roadless Rule ("CRR") is generally poorly understood by many of the groups submitting comments in favor of expansion of Wilderness and Recommended Wilderness in the Planning Process. The Organizations submit the CRR development was an extensive site specific analysis of many of the same areas that have been the basis for possible Wilderness designations in the past and the CRR provided clear guidance for development of non-Wilderness management of these areas moving into the future in the hope of avoiding what has become a never ending discussion of possible designation of these areas. The CRR clearly states that no further protections of these areas is warranted and that the characteristics inventoried should be protected and preserved.

The Organizations were actively and extensively involved in the development of the CRR with the USFS, and can assert without hesitation that the CRR sought to provide a dispersed recreational experience for all users, which is a significant difference from the position asserted by the Wilderness Society in their comments on this issue. The Organizations submit that any interpretation of the CRR in the manner asserted in the Wilderness Society comments twists both the direct language of the CRR and the spirit and intent in developing the CRR. Application of this twisted version of the CRR must be avoided in the development of the GMUG RMP. This alternative based on the Wilderness Society position was specifically reviewed in the development of the CRR and was declined to be implemented.

While the Roadless Rule never altered the multiple use mandates for these areas, the development of the Colorado Roadless Rule went a step further on multiple uses and specifically identifies motorized usage as a characteristic of a Colorado Roadless Area. The CRR specifically states this as follows:

"Roadless areas are, among other things, sources of drinking water, important fish and wildlife habitat, semi-primitive or primitive recreation areas, including **motorized and nonmotorized recreation opportunities**, and natural-appearing landscapes. There is a need to provide for the conservation and management of roadless area characteristics."<sup>44</sup>

Documents developed around the CRR further clearly state this relationship as follows:

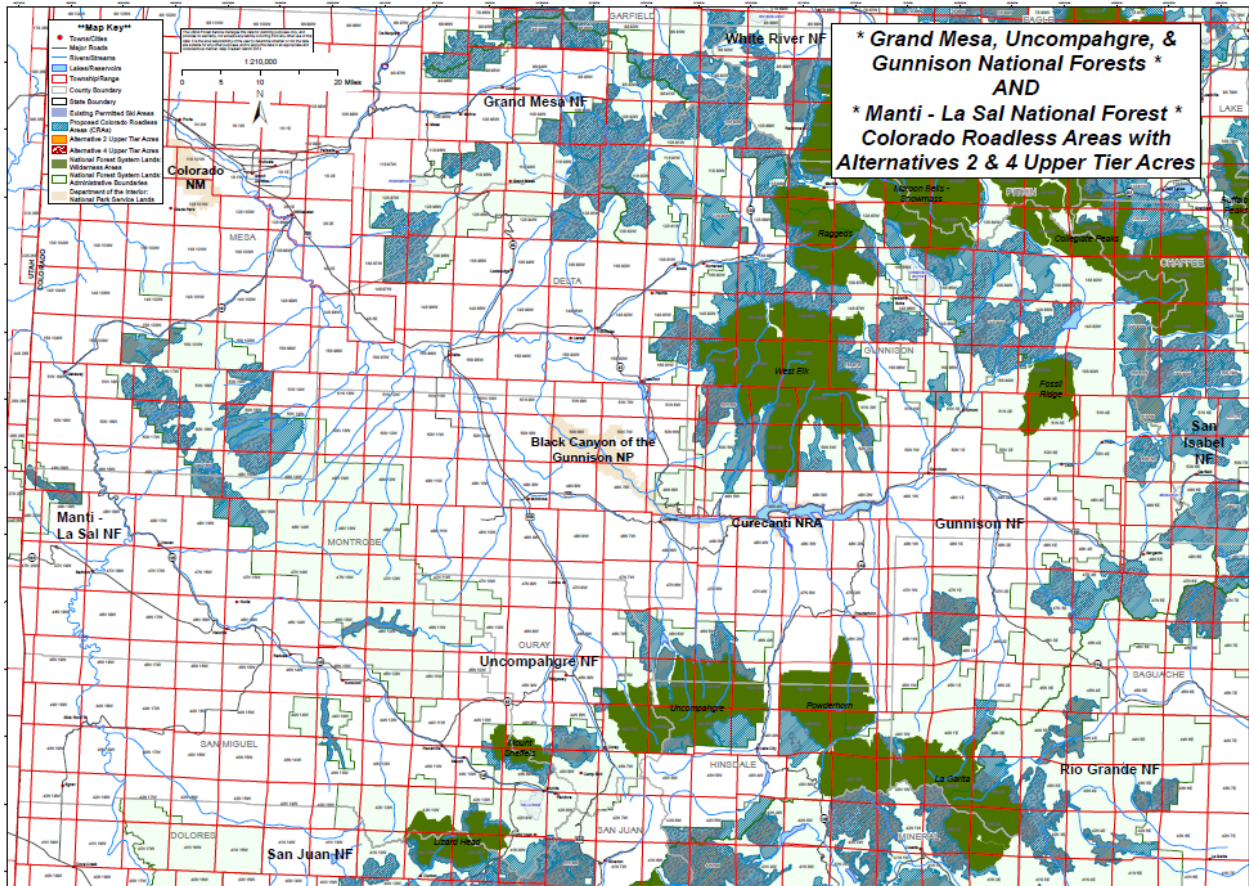
**"The final rule does not prohibit use of existing authorized motorized trails nor does it prohibit the future development of motorized trails in CRAs** (see 36 CFR 294.46(f)). The final rule allows continued motorized trail use of CRAs if determined appropriate through local travel management planning."<sup>45</sup>

The Organizations believe that proper application of the CRR review and analysis process provides significant information regarding areas that should not be managed in a manner similar to Wilderness. Under this review, a significant portion of the GMUG planning area was specifically reviewed for possible Upper Tier Roadless designation and found to be unsuitable.

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<sup>44</sup> See, Department of Agriculture Forest Service 36 CFR Part 294 Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado; Final Rule Vol. 77 Tuesday, No. 128 July 3, 2012 at pg 39577. (Hereinafter referred to as the "Colorado Roadless Rule Final").

<sup>45</sup> See, Colorado Roadless Rule Final at pg 39580.



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Given that a large portion of the Non-Wilderness areas in the GMUG planning area were recently inventoried for possible increases in management to levels that remained below Congressionally designated Wilderness, the Organizations must question what situation or condition has changed in these areas that would allow these areas to become suitable for Wilderness recommendations in the RMP within such a short period of time.

**11. Congressionally designated Wilderness is already an underused recreational resource on the GMUG.**

The Organizations feel compelled to address this issue as we are aware that there has already been extensive comments submitted seeking significant expansions of these areas and the 2005 revision of the GMUG forest plan recommended another 125,000 acres of Wilderness on

<sup>46</sup> A complete version of this document is available here: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5366289.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5366289.pdf)

the GMUG. This is simply staggering and must be avoided in the development of the new RMP. While the Organizations are aware that various federal planning statutes require an inventory for Wilderness Character in the planning process, the Organizations must stress that this is an inventory only and does not require any management of these areas as Wilderness.

Again this public pressure on managers from a small vocal group fails to address the fact that Colorado has a long history of effectively moving large portions of public lands into the National Wilderness system. Currently, Colorado Forests represent 5% of ALL Congressionally designated Wilderness in the Country.<sup>47</sup> If there is a lack of balance in representative landscapes in the Wilderness System, these landscapes should be pursued in other planning areas such as New Mexico or Utah were these states represent less than 1% of the system despite large public lands holdings.

Currently 556,000 acres of Wilderness on the GMUG or about 17% of the management area, placing the GMUG well in excess of many other forests inside Region 2 of the USFS. By comparison approximately 14% of USFS lands in Colorado are Congressionally designated Wilderness. Again, if there is an under representation of Wilderness areas, the GMUG is not contributing to this under representation.

While Wilderness advocates consistently assert the strong demand of users for recreational opportunities in designated Wilderness areas, this has not proven to be the case on the GMUG were the USFS National Visitor Use Monitoring identified that only 4% of GMUG visitors even sought to visit a Wilderness area despite 17% of the forest already being designated as such.<sup>48</sup> As a result of these designations, 96% of all visitation to the GMUG is occurring on only 83% of the planning areas. Recreational usage of GMUG opportunities continues to be tied to motorized access as driving for pleasure, relaxing, and viewing wildlife and natural resources

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<sup>47</sup> See, <http://www.wilderness.net/NWPS/chartResults?chartType=AcreageByStateMost>

<sup>48</sup> See, USFS - *Visitor Use Report Grand Mesa Uncomp Gunnison NF USDA Forest Service Region 2 National Visitor Use Monitoring Data collected FY 2009 - last updated December 16, 2016* at pg 10. Full report available here. [https://apps.fs.usda.gov/nfs/nrm/nvum/results/ReportCache/2009\\_A02004\\_Master\\_Report.pdf](https://apps.fs.usda.gov/nfs/nrm/nvum/results/ReportCache/2009_A02004_Master_Report.pdf)



continues to be strong. Given the significant underutilization of recreational opportunities on the GMUG in Wilderness areas, the Organizations must question the recreational value that could be placed on any expansion of Wilderness like management to expand “quiet use” recreational opportunities. There is simply no scientific basis for such a management expansion.

Expanding Wilderness like management also conflicts with the primary threat to land managers on the GMUG, mainly dealing with the exceptionally poor forest health in the planning area in a timely and cost effective manner. While Wilderness Society and others assert that catastrophic wildfire on public lands is an effective tool for managing these areas, managers are aware that the true public support for fire as a management tool has been marginal at best. Management of any forest area without the ability to use mechanical equipment is simply generally publically accepted meaning the only cost effective management tool to address forest health is streamlining timber production and the Organizations submit that basic cost effectiveness of any management standards must be a priority of any planning. While the Colorado Wilderness Act of 1993 permitted the use of mechanized equipment for maintenance of Wilderness, the Organizations are not aware of use of this authorization due to the vocal opposition to such an activity based on a philosophical opposition. Again this must be addressed and balanced in planning.

In addition to Wilderness being a hugely underutilized recreational resource on the GMUG and a major barrier to cost effective management of the poor forest health on the GMUG, there has been almost no Congressional support for expansion of Wilderness on the GMUG. Many of the areas on the GMUG that are asserted to be suitable for inclusion in the Wilderness system in proposals such as Hidden Gems have been repeatedly analyzed for these issues and consistently found to be unsuitable for inclusion. Congressional action subsequently has repeatedly failed to designate these areas as well. The Organizations are again submitting this information in the hope that a science based management plan can be developed for the GMUG moving forward.

## **12. User conflict often cannot be resolved with route closures, especially in the winter.**

The Organizations believe that analysis of how best available science supports the management decisions and direction any proposal constitutes a critical part of the planning process, especially when addressing perceived user conflicts. This analysis will allow the public to understand the basis of alleged user conflicts and why travel management has been chosen to remedy the concern. Relevant social science has clearly found this analysis to be a critical tool in determining the proper methodology for managing and truly resolving user conflicts.

When socially based user conflict is properly addressed in the Proposal, the need for travel management closures will be significantly reduced. Researchers have specifically identified that properly determining the basis for or type of user conflict is critical to determining the proper method for managing this conflict. Scientific analysis defines the division of conflicts as follows:

“For interpersonal conflict to occur, the physical presence or behavior of an individual or a group of recreationists must interfere with the goals of another individual or group....Social values conflict, on the other hand, can occur between groups who do not share the same norms (Ruddell&Gramann, 1994) and/or values (Saremba& Gill, 1991), independent of the physical presence or actual contact between the groups.....When the conflict stems from interpersonal conflict, zoning incompatible users into different locations of the resource is an effective strategy. When the source of conflict is differences in values, however, zoning is not likely to be very effective. In the Mt. Evans study (Vaske et al., 1995), for example, physically separating hunters from nonhunters did not resolve the conflict in social values expressed by the nonhunting group. Just knowing that people hunt in the area resulted in the perception of conflict. For these types of situations, efforts designed to educate and inform the

different visiting publics about the reasons underlying management actions may be more effective in reducing conflict.”<sup>49</sup>

Other researchers have distinguished types of user conflicts based on a goals interference distinction, described as follows:

“The travel management planning process did not directly assess the prevalence of on-site conflict between non-motorized groups accessing and using the yurts and adjacent motorized users.....The common definition of recreation conflict for an individual assumes that people recreate in order to achieve certain goals, and defines conflict as “goal interference attributed to another's behavior” (Jacob & Schreyer, 1980, p. 369). Therefore, conflict as goal interference is not an objective state, but is an individual's appraisal of past and future social contacts that influences either direct or indirect conflict. It is important to note that the absence of recreational goal attainment alone is insufficient to denote the presence of conflict. The perceived source of this goal interference must be identified as other individuals.”<sup>50</sup>

It is significant to note that Mr. Norling's study, cited above, was specifically created to determine why winter travel management closures had not resolved user conflicts for winter users of a group of yurts on the Wasache-Cache National forest. As noted in Mr. Norling's study, the travel management decisions addressing in the areas surrounding the yurts failed to distinguish why the conflict was occurring and this failure prevented the land managers from effectively resolving the conflict.

The Organizations believe that understanding why the travel management plan was unable to resolve socially based user conflicts on the Wasache-Cache National Forest is critical in the GMUG planning area. Properly understanding the issue to be resolved will ensure that the same errors that occurred on the Wasache-Cache are not implemented again to address

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<sup>49</sup> Carothers, P., Vaske, J. J., & Donnelly, M. P. (2001). *Social values versus interpersonal conflict among hikers and mountain biker*; Journal of Leisure Sciences, 23(1) at pg 58.

<sup>50</sup> See, Norling et al; *Conflict attributed to snowmobiles in a sample of backcountry, non-motorized yurt users in the Wasatch –Cache National Forest*; Utah State University; 2009 at pg 3.

problems they simply cannot resolve. The Organizations believe that the GMUG must learn from this failure and move forward with effective management rather than fall victim to the same mistakes again.

**13a. Factors for analysis in over the snow suitability review on the GMUG.**

Winter travel management has had a long and successful management history within the USFS and more specifically on the GMUG. The Organizations are aware that winter travel has been effectively managed for an extended period of time on the GMUG in partnership with local clubs, Colorado Snowmobile Association and Colorado Parks and Wildlife and the Organizations are not aware of any major challenges to the continued management of GMUG opportunities for high quality winter recreation. USFS planners have already recognized that many forests have effectively managed OSV usage and those that have are simply allowed to publish a map based on prior decisions as follows:

"(b) *Previous over-snow vehicle decisions.* Public notice with no further public involvement is sufficient if an administrative unit or a Ranger District has made previous administrative decisions, under other authorities and including public involvement, which restrict over-snow vehicle use to designated routes and areas over the entire administrative unit or Ranger District, or parts of the administrative unit or Ranger District, where snowfall is adequate for OSV use to occur, and no change is proposed to these previous decisions."<sup>51</sup>

The Organizations are submitting the following comments in an attempt to identify, outline and streamline many of the factors that have been balanced for decades in the OSV management of the GMUG. This has been a long process and while understood many factors were never clearly identified in the management process. Many of the recommendations made in these comments are consistent with the recommendations on these issues that are made by the International Association of Snowmobile Administrators on these issues. The Organizations are

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<sup>51</sup> See, 212.81(b)

also aware that winter recreation is often the basis of large levels of hybridization of traditionally separate uses in order to access the backcountry, such as hybrid skiers and fat tire bicycles. In this section the Organizations will also attempt to provide thoughts and science on many of these new uses of the GMUG winter opportunities to facilitate effective management of these usages.

**13b. Minimum snowfall to trigger OSV management.** At the landscape level, the Organizations urges the GMUG to start any OSV review with the principal that areas with sufficient snow cover should remain open, unless there is a clear reason for an area to be closed to OSV usage. The idea of sufficiency of snowfall is a principal that is woven throughout the new Winter Travel Rule as exemplified by the following quote from the national winter travel efforts:

"OSV use occurs only when sufficient snow is present, in contrast to other types of motor vehicle use, which can occur at any time of the year."<sup>52</sup>

The Organizations submit that this trigger is the recognized standard for implementation or triggering of OSV travel decisions under the new Winter Travel Rule and is the primary method of resource protection for OSV recreation. The recent USFS winter travel rule specifically identified the reasoning for this trigger as follows:

"When properly operated and managed, OSVs do not make direct contact with soil, water, and vegetation; whereas most other types of motor vehicles operate directly on the ground."<sup>53</sup>

The Organizations agree with this position and are only aware of one situation where lower amounts of snowfall should be explored on a non-landscape level, and that is where a designated route is being used to connect an access point (parking area) at a lower altitude to a play area at a higher altitude where more snow is present. Often these routes are groomed along a forest service or county road making concerns regarding possible resource impacts from

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<sup>52</sup> **Federal Register** /Vol. 80, No. 18 /Wednesday, January 28, 2015 /Rules and Regulations **4501**

<sup>53</sup> See, DEPARTMENT OF AGRICULTURE; Forest Service 36 CFR Parts 212 and 261 *Use By Over-Snow Vehicles (Travel Management Rule)* 4500 Federal Register / Vol. 80, No. 18 / Wednesday, January 28, 2015 /

insufficient snow cover minimal, as the route surface under the snow is built to sustain wheeled summer travel. In addition to the improved surface of the roadway under the groomed route, often groomer operators are very successful in moving sufficient packed snow long distances onto the groomed route in order to insure that resources and operator equipment is protected. Several forests in California are exploring having a minimum snowfall amount for the use of groomed routes and another higher amount to allow for off trail riding, such as the Lake Tahoe Basin, Plumas and Stanislaus. Several areas on GMUG are in a similar situation and the Organizations would support a designated trail connecting these lower altitude parking areas with higher altitude deeper snow riding areas as a means of maintaining these high quality recreational opportunities for all users as the groomed route is the sole source of access to these areas for all users. The Organizations believe this question could be resolved at the landscape level with a determination that one amount of snow is required to use an OSV off of a designated route and a lesser amount of snow is required to use an OSV on a designated route.

The operation of an OSV in areas where thin or marginal snow is available and resources could be impacted is a self enforcing restriction as a result of the severe and expensive damage that can occur to equipment when sufficient snow is not available to cool the machine. This damage can be immediate as OSVs rely on snow being thrown on the radiators behind the tunnel/seat to cool the engine and when there is not enough snow contacting these radiators, overheating is almost immediate. In addition to cooling the engine, this snow also lubricates the rear suspension and points where the rear track is in contact with the skid. Without sufficient snow the plastic contact points for the track contact points simply melts and locks the track to the skid. Running an OSV without sufficient snow is the equivalent of removing the fan belt from your car and driving it down the road with the radiator blocked. Damage to your car will come quickly and damage will be costly and the same occurs when OSVs are operated without sufficient snowfall.

The Organizations further submit that snowfall sufficiency should be judged on the landscape level based on usages on and off trail, as there are areas where maintaining snowfall is difficult, such as windswept bluffs and south facing slopes and snow compaction in the Southern Rockies

is the result of natural processes. Given that serious damage can result to equipment after only a short period of use on insufficient snowfall, these areas are avoided by almost all snowmobile users. Any attempt to review the sufficiency of snowfall on a smaller scale will result in inconsistent results as sometimes snow falls are heavy in one location and not at others. These threshold snowfall questions are almost academic in the GMUG areas as snowfall frequently exceeds minimum amounts very quickly and often snowfall persists into the early summer.

The Organizations also submit that the compaction of snowfall should not be a major concern in the review of snowfall sufficiency, as several inches of fluffy snowfall frequently compacts down to only a few inches of compacted snow as the result of natural processes. While the snowfall maybe more compact, the protection of resources under the snow remains the same as often the water content of the snowfall does not change. The ACSA Facts and myths book notes several studies where only a few inches of compacted snowfall provides significant protection to resources under that snowfall. Again the Organizations stress that snowmobiles are simply forced to go around larger objects that might be uncovered as snowfall compacts as larger objects simply result in the rider crashing.

**13c. Dates to trigger OSV management-** The Organizations have been involved with the attempted usage of hard dates (such as Nov 1- Apr 1) for the triggering and stopping of OSV usage in particular areas and the Vail Pass Winter Recreation Area ("VPWRA") on the White River National Forest would be one such example. The Organizations submit that this management standard is more the result of held over principals from the summer travel management process than a reasoned management standard for OSV usage. Often these dates at the VPWRA have little to do with snowfall in the areas managed for OSV usage, as frequently there are early heavy snowfalls that result in high amounts of frustration as snowmobilers want to ride the more than sufficient snow and are not able simply because the storm has come too early.

The lack of snowfall on the start date (reverse situation of the early storm) does not balance out the lost opportunities of early storms as if the date arrives for OSV management and there is insufficient snowfall, riders still cannot use these areas due to the severe damage that can

result to their equipment from operation on insufficient snow. The Organizations submit that hard dates can also significantly shorten seasons as well, as often the heavy snowfall in the GMUG does not occur until later in the winter seasons (March or April) and significant snowfalls on riding areas are not unusual in May. These late season storms can provide major snowfall and resource protection and exceptional riding opportunities due to the well established base of snow that remains on the ground but often fall outside trigger dates for OSV travel. Relying on hard dates to trigger OSV management simply result in lost riding opportunities and significant frustration of users without generating additional resource protection.

The Organizations submit that the usage of hard dates to trigger the start of OSV management creates a lot of frustration for users and conflict between managers and users that is completely unnecessary. As a result the Organizations submit that dates alone should be avoided and if hard dates are explored as the trigger for OSV travel that these dates be made as long as possible and as an alternative to minimum snowfall (18 inches of snowfall or Nov 1) rather than in conjunction with a minimum snowfall (18 inches and Nov. 1).

**13d. Altitude to trigger OSV management-** The Organizations are aware that several forests in California (Stanislaus, Plumas, Tahoe) are exploring an altitude restriction as part of their OSV decision making process. (ie: OSV only allowed above 6,500 ft). The Organizations are opposed to this type of factor being relied on for triggering of OSV management, as this factor simply does not relate to snowfall at a particular location and carries forward many of the concerns the Organizations have with hard dates to trigger OSV usage.

Additionally, the scientific basis for this decision and standard is unclear at best. The Organizations are further concerned that the introduction of a third type of trigger for OSV travel will make it difficult to educate users regarding the trigger being in existence and will also result in significant new expense for users who would now be required to carry an altimeter into the backcountry as well. It has been the Organization's experience that most hand held altimeters are effective in identifying hundreds of feet difference but simply lose accuracy when trying to address altitude more accurately due to their inability to correct for temperature and barometric pressure fluctuations. The Organizations submit that an OSV traveler being issued a



ticket when there is sufficient snowfall based on a couple of foot discrepancy between his altimeter and an officers is not a fact pattern that appeals to users. The Organizations are very concerned that such management will make little sense on the ground, lacks a valid scientific basis and result in significant conflict between managers and users that is completely unnecessary and achieves no additional resource protection. While triggering OSV travel based on altitude is a novel idea to be explored, there are too many challenges with this standard for it to be implemented.

**13e. All types of usage should be included in OSV planning-** It has been the Organizations' experience that there is an ever expanding diversity of recreational usage in the winter backcountry and often new usages are coming into the backcountry that simply were never envisioned even a few years ago. The Organizations expect this to be the norm moving forward rather than an isolated incident and would support some experimental type designations in the GMUG area for research on a wide variety of factors to determine what types of usage are scientifically defensible.

While the Organizations welcome new uses, winter recreational management decisions **must** remain science based in order to be defensible in court as the local clubs that are grooming areas are almost always named in litigation addressing OSV usage. Scientifically defensible management of a user group should not be put at risk of legal challenge to accommodate other usages without the same level of scientific defensibility. This is an issue the snowmobile community feels very strongly about as the snowmobile community has directed tens of millions of dollars and the entirety of people lives to identifying and defending the scientific basis for the OSV distinction from summer travel. The Organizations would also like to avoid reopening discussions regarding wheeled vehicles on winter trails, such as jeeps and pickup trucks. These vehicles were excluded from winter groomed routes, and the Organizations would like to move forward from that decision as the high pressures these vehicles apply on the snow damage trails and remove the effectiveness of the snow buffer between recreational users and resources protected by the buffer.

Often when new users have come into the winter backcountry, each of these new user groups feel the need to have a separated area of the forest for their desired usage and this has led to problems with existing usage and unnecessary user conflict. The Organizations would be opposed to the large scale designation of separate play areas for each usage, as the Organizations vigorously believes that all usages should be encouraged to play together in the backcountry as winter recreation is heavily dependent on the groomed winter route network provided by the local snowmobile clubs for access to any portion of the GMUG. Not only does requiring one community to maintain access to recreational opportunities for other user groups free of charge create user conflict issues, it could easily place local clubs in a position where grooming violates Colorado legal requirements that clubs only groom areas open to motorized usage. Localized planning based on these factors would be more problematic and could lead to the loss of OSV open area opportunities, which would be opposed by the Organizations.

If there are areas where usages that are inconsistent, the Organizations do support separate parking areas for these usages in order to reduce conflicts as most conflict of winter users occurs at trailheads as access points are often limited in the winter. The Organizations are also aware that separate parking areas often is not possible due to the fact that groomed routes are the primary method of accessing the backcountry and those winter groomed routes are provided predominately by the CPW winter grooming program paid for with snowmobile registration funds. This is an issue where a balance simply must be struck due to funding limitations for grooming activities.

**13f. Expanding usages have decreased the relevance of many previous planning factors-** The Organizations support access being provided to all types of winter backcountry users in a scientifically responsible manner and these new usages will impact the suitability analysis of areas for recreational usage. Historically areas have been found unsuitable for OSV usage for a variety of reasons such as steep terrain or dense trees. It is the Organizations position that new usages of the winter backcountry have almost entirely removed many factors for analysis due to the recreational needs of these new user groups and provide further justification for moving to a minimum snowfall standard only. The Organizations provide the following examples of impacts to new backcountry usages from traditional forms of analysis, not as an exhaustive list,

but rather in an attempt to justify why basic snowfall requirements should be the primary factor looked at for winter travel and these traditional factors are no longer relevant.

The Organizations would note that steeper terrain has become far more accessible and desirable for all backcountry winter users over recent years. These steep areas are often the most highly valued opportunities for some newer usages in the winter backcountry such as hybrid skiers (skiers using snowmobiles to access backcountry skiing opportunities). Often avalanche chutes and other slide areas are the most sought after areas for hybrid or backcountry skiing, making these areas difficult to call unsuitable for motorized usage. While the Organizations share basic safety apprehensions about some of these uses with land managers, excluding these hybrid skiing areas from OSV suitability due to concerns about the steepness of terrain would render many of these highly sought after areas unavailable for hybrid skiing.

The Organizations is also aware that suitability reviews in other areas have attempted to include areas of dense tree growth in areas found unsuitable for OSV, however this type of review has not worked well in summarizing areas where OSV's are and are not able to traverse. Additionally this is a very subjective standard that non-snowmobile users struggle with and these types of standards have not adapted to the fact that snowmobiles are far more agile for the average rider now when compared to those units made even 10 years ago. It has been the Organizations experience that while these units have allowed intermediate riders to access more advanced areas, advanced riders are not accessing new areas, simply because these riders could access most areas even on older units. The improved maneuverability of these units makes tree areas more usable for intermediate skill OSV, which can make these areas even more valuable under poor light or storm conditions as the trees provide contrast for riders to use that simply cannot be found in open meadow areas.

Tree density is a factor where hybrid usage, mainly Timbersleds, have greatly changed the relevance of tree density in the suitability analysis, as hybrid users find more densely forested areas of the backcountry the desired recreational opportunity. These hybrid users easily traverse areas that are difficult to traverse on a traditional snowmobile and simply don't seek

the more open areas favored by traditional snowmobile usage. Many users of Timbersled type conversions find dense tree areas very desirable, as these areas can be easily traversed with Timbersleds and this provides a riding experience similar to a technical single track trail in the summer time for a motorcycle rider. Timbersled riders also find that better snow conditions persist longer in dense trees than open meadows as these areas are shielded from direct sunlight. While snowmobiles are more agile and able to access these more dense areas, Timbersleds can traverse areas where no traditional snowmobile can travel in areas of dense trees.

**13g. Access points for the winter backcountry have changed-** The Organizations submit that access issues related to backcountry winter recreation have changed with the invent of hybrid usages such as fat tire bikes, Timbersleds, sled decks and hybrid skiers, and these changes are most commonly seen in terms of parking as well. Historically areas have been closed to OSV usage based on limited parking or access to an area, as traditional OSV usage has been hinged around a trailer to transport vehicles. While some users loaded and unloaded snowmobiles into trucks to ride in a particular area, this was not the overwhelming portion of the snowmobile community since this process can be difficult to do and almost always results in damage to the pickup truck bed that snowmobiles are being loaded into. Many hybrid users are not limited by the need for a trailer under any conditions and advances in ramp design now allow the cost effective and easy loading of a snowmobile in a pickup truck bed without damage, making this transportation method more viable for the traditional snowmobile user.<sup>54</sup> The Organizations are also aware that many riders choose to use a sled-deck design on their pickup truck due to the increased flexibility provided by this transportation option.<sup>55</sup> The following pictures are provided in order to insure full understanding of these new trailerless transport products:

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<sup>54</sup> [http://www.discounttramps.com/snowmobile-loading-ramps/p/50BS/?CID=PSC-PLA-Bing-750-BS-snowmobile-ramps&st-t=bing-snowmobile-ramps&CAWELAID=82056299000003621&utm\\_source=bing&utm\\_medium=cpc&utm\\_campaign=PLA-ALL%20Products\(BSC\)&utm\\_term=1100008095214&utm\\_content=All%20Products](http://www.discounttramps.com/snowmobile-loading-ramps/p/50BS/?CID=PSC-PLA-Bing-750-BS-snowmobile-ramps&st-t=bing-snowmobile-ramps&CAWELAID=82056299000003621&utm_source=bing&utm_medium=cpc&utm_campaign=PLA-ALL%20Products(BSC)&utm_term=1100008095214&utm_content=All%20Products)

<sup>55</sup> These photos and further information on these products is available at <http://truckbossdecks.com/SNOW.html>



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This trailerless model of transportation is the norm for most hybrid uses as multiple Timbersled, or fat tire bicycle type vehicles can easily be loaded in a pickup truck bed without special equipment. As there is no trailer being moved, smaller access points to the winter backcountry represent viable access points for winter hybrid users. Areas that have traditionally had lower levels of usage due to parking limitations are often sought out by hybrid users or snowmobilers no longer towing a trailer who seeking a more dispersed recreational experience in the backcountry.

With the reduced need for trailers to participate in the winter backcountry, the Organizations submit that limited parking should not be a significant factor in the analysis of any areas for suitability for OSV usage. Parking next to a high speed arterial road poses many safety concerns but this is not the normal situation for accessing snowmobile areas as many are accessed off low speed forest service roads with users pulling to the side of the road in wide areas to access adjacent opportunities.

**13h. Flexibility moving forward-** The Organizations are aware that there are numerous hybrid vehicles and uses being developed, such as fat tire bicycles that were simply unheard of several years ago. The Organizations believe that continued development of these types of vehicles will result in the merger of even more non-traditional usages of the backcountry, such as fat tire E-Bikes or tracked bicycles. It has been the Organizations experience that while often these conversions are marketed as being able to easily convert from summer to winter usage, these conversions are often difficult and expensive and as a result once converted, vehicles often remain in their winter converted form. The Organizations do not see these conversions/hybrid as replacing the more traditional snowmobiles, rather the Organizations believe these units do

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have a place in the spectrum of winter motorized recreation. For purposes, the Organizations will divide these new users into two general categories: 1. Those who are adapting their vehicles to use a track or tracks to traverse snow; and 2. Those that are seeking to traverse snow by merely relying on larger wheels and tires. These two user groups pose different management challenges for OSV.

While the Organizations welcomes new uses, winter recreational management decisions must remain science based. The Organizations have ongoing concerns with impacts to trails and other resources that arise from use of wheeled vehicles on winter trails, however the Organizations' experiences with tracked conversion summer vehicles has been significantly different and welcomes these conversion vehicles, after they have complied with State OHV registration regulations for use of motor vehicles on groomed winter trails. Our initial research indicates that these tracked conversion vehicles exert similar pressures on the snow as traditional snowmobiles, making any risks of resource damage from usage of these conversions similar to that of snowmobiles.<sup>57</sup> These impacts have already been well documented as minimal to entirely non-existent. These tracked conversion vehicles also allow entirely new classes of public users into the winter backcountry to experience the exceptional opportunities these areas provide, either by accessing their local lake for winter ice fishing opportunities or by making the more traditional winter backcountry motorized experience available.

These track conversion vehicles include motorcycles where the front tire has been removed in favor of a snowmobile like skis and the rear wheel is exchanged in favor of a large track. The Organizations are aware of discussions around trying to manage these conversion vehicles based on the intent of the designers of the vehicles, and this position is problematic with the Organizations. These summer based conversions provide the winter backcountry experience at reduced cost to users as multiple vehicles are less needed or lower costs units can be converted. Under certain conditions, these conversions provide a more durable recreational experience than a traditional snowmobile on warmer days, or days when the snow has become very firm, as these conversions do not rely on loose snow contacting any portion of the vehicle

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<sup>57</sup> A Copy of this study has been enclosed with these comments for your reference and complete review as Exhibit 7.

for the reduction of operating temperatures. These vehicles are designed to cool without any external assistance from snow contacting the vehicle.

Photos of some of these types of motorcycle conversion vehicles are below:



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The Organizations are aware that there has been similar vehicles, designed specifically for over the snow travel, to these motorcycle conversions in production for a long time under the Snow hawk brand. The following picture represents the Snow hawk vehicle:



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It has been the Organizations' experience that while the Snowhawk may have struggled in the market place for reasons that are unclear, the conversion motorcycles have rapidly developed a

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<sup>58</sup> Picture credit to timbersled industries and more information is available regarding these products here <http://www.timbersled.com/snowbike.htm>

<sup>59</sup> More information on these vehicles is available here: <http://www.motosportsthibeault.com/>

strong customer base and are frequently seen in the backcountry. Permitting a Snowhawk to be managed under winter travel management guidelines, while prohibiting the motorcycle conversions as they are not designed for winter travel could easily appear arbitrary and lead to difficulties for local managers and partners.

Similar track conversion are not just limited to motorized vehicles and are now available for bicycles. The Organizations are not aware of the background or viability of bicycle based conversions for winter use, such as that pictured below, but the Organizations are aware these vehicles are growing in popularity and will probably be seen in increasing numbers in the winter backcountry areas in the near future.



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Given the expected life of the RMP, the usage of these human powered types of vehicles would become an issue for travel management as these types of designs would anticipated to be perfected within the lifespan of the RMP.

The Organizations are also aware that many traditional ATVs and side by side vehicles exchange tires for track assemblies that allow these vehicles to easily travel over snow. The following photos represent an ATV that has undergone this track conversion:

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<sup>60</sup> More information on this conversion is available here: <http://www.ktrak.es/indexeng.htm> The Organizations are not taking a position as to the management of these vehicles, as we have never seen one or are aware of any research on pressure the vehicle applies to snow. The Organizations are providing this portion of our comments as an example of the rapidly changing nature of this class of vehicles.





Clarity in management of these ATV conversions is further made necessary by recent industry actions regarding the sales and support of tracked conversions. Both Polaris Industries and BRP are now selling track kits for delivery on ATVs and Side by Side vehicles with full warranties and OEM parts availability for both the tracks and vehicle being provided from Polaris or BRP.<sup>62</sup> In addition, the Organizations understand that several models include provisions for the operator to choose if the vehicle is using tracks or wheels in the vehicles operation system. This provision allows accurate information on data, such as vehicle speed to be automatically compensated for the use of tracks or wheels. With these provisions, data on vehicle speed could be off by as much as 30%. The Organizations believe that these industry actions provide a credible argument that these traditional OHVs are also designed to be OSVs.

Enforcement of travel restrictions based on the source of these pieces of equipment would be problematic and could lead to management being based on if the manufacture of the track system was by the vehicle manufacturer or if the tracks came from a third party. Clearly, precluding a Kawasaki ATV with a Camoplast track kit while allowing a Polaris ATV with Polaris tracks would lead to nothing but conflict with users and arbitrary standards that had no relationship to mitigation of damages to resources. This should be avoided and a broad OSV definition would resolve this issue.

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<sup>61</sup> <http://www.atvtracks.net/>

<sup>62</sup> <http://www.polaris.com/en-us/rzr-side-by-side/shop/accessories/tracks> or [http://store.can-am.brp.com/products/683518/APACHE\\_TRACK\\_SYSTEM](http://store.can-am.brp.com/products/683518/APACHE_TRACK_SYSTEM)

The Organizations are concerned that the overly narrow definition of an OSV could impact permitted grooming activities at some time in the future, as this type of vehicle certainly could become more suited for use in Colorado. Farm tractor conversions are now frequently used for trail grooming activities in certain parts of the country, as the track conversion kits allow for use of the grooming equipment throughout the year by adding or removing tracks depending on the season.



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While these grooming conversions are not heavily used in Colorado due to exceptionally steep terrain and deep snow conditions, it is our understanding that clubs or state agencies in other areas of the Country that are utilizing these conversions can significantly reduce overall costs incurred in grooming activities. While most questions regarding the use of a conversion farm tractor for grooming could be resolved in the permitting process, the inability of a grooming organization to use a tracked farm tractor based groomer on federal lands could be a major barrier to a club or organizations that grooms large tracts of non-federal lands, where the farm tractor on tracks would be a cost efficient and acceptable alternative to dedicated grooming equipment. These types of conflicts or questions should be avoided.

The second major category of winter vehicle conversions, mainly those users attempting to traverse the winter back country by merely adding larger tires to their chosen means of travel is more problematic. This is an issue where motorized management has clearly been established for a long time and this should not be altered at the landscape level. At this time the most

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<sup>63</sup> <http://www.soucy-track.com/en-CA/products/grooming/groomers/st-600wt/photos>

prominent of users of larger wheels and tires for winter travel is the bicycle community as the usage of motorized vehicles with the mere addition of larger wheels and tires has been declined. The Organizations have already experienced fat tire bicycle usage on winter trails, such as that pictured below:



While larger tires is asserted to be a valid use of winter trails from the bicycle community, the idea of merely accepting larger wheels for traversing snow has already been declined for motorized usage. While this usage is asserted to be valid by the manufacturer, the Organizations are concerned about the basis for this position. The Organizations must question the basis for such a distinction as the only research on pressures from fat tire bicycles<sup>65</sup> yields the following results:

**Table 1: Ground Pressure Comparisons**

Vehicle Type	Vehicle PSI
Snowmobile	0.50
Tracked ATV	0.55
Tracked UTV, 50" RZR	0.60
Tracked UTV, larger models	0.90
Wheeled ATV	2.0
Wheeled UTV	3.9
Fat Tire Bicycle	3.0 to 6.1

<sup>64</sup> Further information on this usage is available here: <http://thedailynews.cc/2014/01/27/fat-tire-biking-is-a-growing-trend-in-winter-months/>

<sup>65</sup> See, American Council of Snowmobile Associations; *Fat Tire Bicycle Use on Snowmobile Trails; Background Information and Management Considerations*; July 2016 pg 7. This research is exhibit 8 to these comments.

The Organizations concerns are far from abstract on this issue as the Stanislaus NF is closing significant areas to OSV usage due to possible contact with Yellow legged Frog and Yosemite Toad from grooming until questions regarding pressures on the hibernating toad from grooming can be resolved. Higher pressure of fat tire is major concern in these areas as the higher pressure bicycle tire would be more likely to strike and kill a toad than low pressure track assemblies on grooming equipment. This list of issues is far from comprehensive but the Organizations believe it is important to recognize these issues and questions already exist and will probably not simply fade away over the life of the RMP. These questions will simply expand with every new hybrid usage accepted into the winter backcountry.

Given this research and that all relevant travel determinations have excluded both wheeled ATV and UTV from winter trails due to the pressure that these vehicles exert on the ground, any attempt to permit fat tire bicycles due to a lack of pressure or impacts would be problematic at best. The basic lack of scientific evidence to support the position would be a major concern for the snowmobile community as this is the community that has directed hundreds of millions of dollars and peoples entire lives to establishing the scientific basis of the snow buffer.

The Organizations believe that laying the ground work for management of these wheel conversion vehicles in the RMP is sound policy and good management. The Organizations have significant experience in partnering with USFS to educate users of these conversions. Often this educational partnership has been made more difficult as confusion in classifying these conversion vehicles makes it difficult to educate winter recreational users of these conversions as to when they can and when they cannot use particular vehicles and if they are legal at all, which leads to frustration to users. The Organizations have struggled with assisting the public in identifying if a particular vehicle is allowed in a particular Ranger District at a particular time of the year.

The Organizations are aware that in some areas of the country groomed routes and other facilities such as bridges may not be of sufficient size to accommodate some of the conversion

vehicles. While these situations exist, they certainly are not the norm. The Organizations believe local managers are able to easily address any site specific issues either with weight or width restrictions for vehicles using trails in these areas. Summer motor vehicle management has proven these types of local decisions addressing width or weight restrictions highly effective. The public awareness of these types of standards will allow weight or width restrictions to translate easily to winter travel management process and decisions in areas where they might be necessary.

**14. Factors to be addressed with usage of hybrid motorized/winter mechanized under GMUG OSV suitability.**

The Organizations believe these hybrid usages will increase over the life of the RMP and will result in vehicles that simply are not even imagined at this time and that these are rapidly growing areas of usage that needs consistency in management. While there is a generally good relationship between certain user groups and traditional snowmobile clubs, current management is causing conflict as there is a wide range of relationships between snowmobile and winter mechanized users ranging from openly hostile to active partnerships. Additionally, there is serious conflict between traditional non-motorized and mechanized winter usage and avoiding those issues is important to the snowmobile community as they do not involve the snowmobile community, such as the attempted usage of fat tire bicycles on groomed cross country ski trails. The Organizations are aware this conflict was immediate on the Rabbit Ears pass outside Steamboat Colorado and the snowmobile community was immediately implicated but successfully avoided much of this conflict.

Generally management should be based on how the vehicle contacts the snow buffer(ski/track or wheel) and what is the impact of the use on the snow buffer and resources underneath that buffer rather than how it is propelled. Currently many hybrid motorized usages are simply unable to spin the tracks used for over the snow travel but the Organizations simply do not expect that situation to persist throughout the expected life of the RMP. Providing guidance

based on how the usage contacts snow in the RMP allows for more consistency and predictability for new uses moving forward. Principles/Concerns at issue include:

**a. The principal of winter travel management is based on the buffer that exists between recreational activities on the snow and resources below the snow.** The protection of the effective buffer between recreational usage and resources must be major priority in review of any issue. Where the buffer is present, additional review of resource issues should be limited as the buffer is best available science and closure should be avoided unless there is a compelling reason for such closure. The snowmobile community has invested decades of effort and hundreds of millions in this science surrounding the snow buffer and is sensitive to any major impairments of this protections by uses that might exert higher pressures on the snow. Any concerns on these usages will probably result in the snowmobile community being drawn into litigation and possible loss of opportunity as litigation moves forward.

**14b. The groomed route system provided by the snowmobile/permitees community is overwhelming provider of access to backcountry for all users.**

**14c. All routes that are groomed by snowmobile clubs must remain multiple use** unless specifically developed, funded and maintained for non-motorized/winter mechanized usage. Colorado law prohibit usage of snowmobile registration monies to maintain trails that are closed to snowmobiles.

**14d. Usage should not be permitted over the objection of local snowmobile clubs or permittees grooming area** due to huge amount of volunteer support for grooming efforts and many areas would not be groomed without permittees activity. Protecting this partnership is a critical component of maintaining high quality winter recreational opportunities on the GMUG.

**14e. Best available science must be relied on for any usage of hybrid motorized/winter mechanized travel decisions.** Challenges to any decision permitting hybrid motorized/winter mechanized will result in the snowmobile community will be forced to defend that decision to avoid loss of traditional groomed routes as the challenge will be to all OSV travel and not just hybrid motorized/winter mechanized. As a result the snowmobile community has a vested interest in best available science being relied on for the addition of new types of usages.

Snowmobile access has already been lost in areas of California where there were concerns over pressure of usage possibly negatively impacting several species of toad. Clearly concerns like this expand when higher pressure vehicles are allowed.

**14f. Hybrid motorized/winter tracked mechanized must exhibit similar levels of pressure on the snow as a traditional snowmobile to be fully permitted in open areas.** Hybrid motorized/winter mechanized tracked vehicles utilizing some type of ski/track combo exhibit very low pressure on the snow and are of minimal concern currently based on research.

**14g. Pressure from vehicles simply using larger tires is a more serious concern due to small contact areas with the snow buffer which results in higher pressures on the snowbuffer.** Primarily this is a concern with fat tire bicycles but usage of traditional mountain bikes on winter groomed trails provides even more concern due to the narrower tires resulting in higher pressures. The Organizations submit that signing to the allow ability of a fat tire bicycle on a route while prohibiting a traditional mountain bicycle will be difficult and must be resolved by that user group. The Organizations are willing to partner on these efforts but the determinations and resources to manage these questions must come from the cycling community, simply to avoid user conflict between the groups. The management of these pressure related questions are issues that the Organizations sees the user groups for these new types of usage being a significant resource in resolution of these questions on usage. Any research we have been able to locate to date is concerning effective management of these basic questions has been sparse at best.

Effective management of possible impacts from winter mechanized are more significant if trail conditions are soft due to warm temperatures or intense sunlight. Cutting through snow buffer could shorten the life of the trail by exposing dirt and accelerating melting of the snow buffer. The Organizations simply is unaware of any research addressing the pressure of a fat tire wheeled vehicle on the snow in order to mitigate concerns or provide a scientifically defensible decision that could be defended in court.

**14h. Decisions regarding winter wheeled usage must be highly site specific.** The Organizations have serious concerns about allowing this usage but submit if such usage is

permitted it must be strictly managed due to fact that winter mechanized exhibit 100x pressure on snow when compared to other OSV. At most, the Organizations would be willing to explore possible usage of existing summer routes that are groomed in the winter until science can be developed to clarify our concerns. The highly localized decision making for hybrid motorized/winter mechanized is consistent with the position of the International Association of Snowmobile Administrators on this issue.

**14i. Wheeled vehicles should remain prohibited at the landscape level** as wheeled vehicles are simply not suitable on groomed winter routes. The Organizations and land managers are aware that big tire 4x4 and wheeled ATV seriously damage groomed routes. This is an issue that has basically been resolved in many areas and the snowmobile community would like to avoid reopening the discussion unless there is a compelling reason to do so.

**14j. Off trail/open area usage should remain prohibited for winter wheeled usages** due to resource and safety concerns from higher pressure usages on the snow buffer. These safety concerns would include snowbridges built on trails across creeks and water crossings and willow areas may be seriously impacted by high pressure usages, which can easily be traversed by lower pressure vehicles. Until such time as the pressure of a fat tire bicycle can be clearly determined to apply less pressure than usages already prohibited due to pressure concerns, these areas would be a concern for resource impacts.

**14k. There may be opportunity areas for winter mechanized usage** that are currently not utilized such as paved bike routes etc. These are areas that should be explored as opportunity areas for winter wheeled usage. These areas might even be available for use of traditional mountain bikes in the winter time.

**14l. Many groomed OSV routes are not suitable for winter mechanized travel**, such as those that rely on creating a groomed snowbridge for OSV usage across streams. OSV routes may also have steep hills/limited visibility areas where hybrid/mechanized usage may not be appropriate, and the idea of an OSV user having to ride around hybrid usage pushing bikes up a hill is a safety concern for all users. Maintaining snowbridges under higher pressure usages will increase costs to the Organizations maintaining the area.



**14m. The relationship between seasonal closures of particular routes for summer MVUM purposes and opening of usage for winter mechanized in the OSVUM process is unclear and will need to be clarified.**

**14n. Any hybrid mechanized designations must be developed on best available science to avoid unintended consequences to the traditional OSV community of users.** The Stanislaus NF is closing significant areas to OSV usage due to possible contact with Yellow legged Frog and Yosemite Toad from grooming. Higher pressure of fat tire is major concern in these areas as the higher pressure bicycle tire would be more likely to strike and kill a toad than low pressure track assemblies on grooming equipment. This list of issues is far from comprehensive.

**14o. Hybrid motorized/winter mechanized must be registered with the state for respective season of usage.** Colorado is currently accepting registrations for snowbikes. Valley county in Idaho already requires registration of hybrid mechanized usages on winter routes and has been very successful to date. The Organizations submit that this is an important factor in expanding usages as current funding for OSV grooming is simply insufficient.

**14p. All vehicles ridden at night must have a visible lighting system.** The Organizations would recommended use of some type of lighting system at all times due to poor weather conditions that frequent riding areas. This provides safety for all users of the area.

**14q. Funding for additional management resources** must be identified prior to allowing usages. New usages will need extensive signage and education which will not be funded by the snowmobile community and should not become an additional burden on USFS limited resources. As previously noted the Organizations are not aware of any proposal for signage of usage of areas for fat tire bicycles and any method to permit fat tire bicycles and exclude traditional mountain bikes.

**14r. Enforcement/education actions must be undertaken** if routes are opened to only a particular usage. On the WRNF, which has excluded mountain bikes very little enforcement has occurred despite prohibitions of winter mechanized in numerous forest plans. Enforcement/education efforts are a critical component of resolving these questions as without

the actions there will be no motivating factor to move forward in resolving some difficult questions.

**14s. Congressional/ special designations-** Congressional designations, such as Wilderness and Special Management areas, should be followed in the development of winter travel plans. While compliance with these designations is very important, the management of these areas should not impact areas outside those that Congress has specifically spoken regarding the management or usage of.

The White River NF made a blanket designation of all downhill ski areas as unsuitable for motorized usage as part of their winter travel plan. This decision has resulted in several unintended consequences for local snowmobile clubs who would partner with local ski areas to allow OSV usage after the close of the traditional ski season as a special event. These events were conducted with the issuance of a special event permit and were vigorously supported by both communities as these events were a fund raiser for local clubs grooming efforts and often search and rescue or avalanche programs at the ski area. After ski areas being found to be non-motorized areas unsuitable for motorized usage these events ceased to occur. These events provided exceptionally unique opportunities for usage of these areas and were significant steps in building partnerships between these two traditionally isolated user groups. The Organizations submit that any plan should allow the flexibility to issue these types of permits as the loss of these events on the White River NF was both unfortunate and negatively impacted each community.

**14t. Grooming** - A review of the suitability of any area should reflect both groomed routes and designated routes that are not groomed should be included in any OSV analysis as ungroomed routes can provide significant access to the backcountry play areas that are highly valued by the OSV community.

**14u. Best available science-** simply must be followed and applied for all usages. The Organizations submit that if best available science is not applied for all uses in the winter backcountry litigation will result. In this litigation The Organizations will either be named due to the grooming of the area or usage of the area or be forced to intervene with the USFS to

avoid loss of grooming permits etc even if the lawsuit is challenging usages that are not traditionally snowmobile related, such as fat tires on groomed winter routes. The Organizations would like to avoid this situation if possible and if such a situation does come to be, that the USFS decision is defensible and does not require OSV planning to start over again as a decision was not made on best available science and resource impacts could be occurring from the non-OSV related activity.

14v. Wildlife winter range - while this should not be a major area of conflict on the GMUG due to the minimal overlap of possible winter range and OSV usage areas this is a factor that should be reviewed as any planning moves forward. Possible concerns of OSV usage can be mitigated by moving to a designated route system in winter range for deer and elk range instead of closing the area.

The Organizations vigorously asserts that if an area is of such significance for wildlife winter range to warrant a closure of the area to OSV , that the area should be closed to all usages, as often wildlife response to hikers and other non-motorized is similar to OSV and Wildlife response to an off leash dog is disproportionate to all other uses.<sup>66</sup>

## **15. Conclusion.**

The Organizations welcome the opportunity to provide input on forest level issues facing the GMUG and are additionally providing new information and research in these comments on a variety of issues to insure that the best available information is relied on by Forest planners in the development of the Resource Plan. The Organizations would urge planners to clearly identify the three major challenges that are expected to be encountered on the Forest over the life of the RMP, in order to streamline and insure alignment of any subsequent site specific planning with addressing these challenges. The Organizations also would like to clarify our position on several issues, such as our complete lack of involvement in the development of the Gunnison Public lands Initiative and the fact that the Organizations are vigorously opposed to

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<sup>66</sup> See, Sime, C. A. 1999. Domestic Dogs in Wildlife Habitats. Pages 8.1-8.17 in G. Joslin and H. Youmans, coordinators. *Effects of recreation on Rocky Mountain wildlife: A Review for Montana. Committee on Effects of Recreation on Wildlife*, Montana Chapter of The Wildlife Society. 307pp.

the Proposal. The Organizations also submit that issues such as the Gunnison Public lands Initiative are good examples of Proposals that should be entirely avoided in the RMP development as they will direct the ever declining Forest Service resources away from the major challenges that are facing the GMUG and could in fact make addressing the poor forest health issues both more costly and difficult on the GMUG in the future.

The Organizations would welcome a discussion of these opportunities and any other challenges that might be facing the GMUG moving forward at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell (719) 338- 4106 or Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com).

Respectfully Submitted,



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Enclosures