

Back Country Horsemen of Colorado



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2250 South Main Street

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To Whom it May Concern:

Please accept these comments on behalf of Back Country Horsemen of Colorado (BCHCO), consisting of more than 600 members statewide, regarding the Grand Mesa, Uncompahgre and Gunnison National Forest Draft Assessment Plan. It is the mission of BCHCO to perpetuate the common sense use and enjoyment of horses in America's back country and wilderness and to ensure that public lands remain open to recreational stock use. A large part of our mission includes assisting the various government and private agencies in the maintenance and management of public trails and horse camps, and to educate, encourage and solicit active participation in the wise use of the back country resource by horsemen and the general public commensurate with our heritage. In 2016, our members contributed just under \$850,000 of volunteer work on our public lands

“Earlier this year, the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) initiated plan revision, a three-phase process to revise the Forest Plan, the overarching document guiding forest management for the long-term.” Your statement here is crucial and it appears that you are on the right track. Being that “The overarching purpose of the plan revision process is to ensure that national forests are sustainably managed for generations to come,” we want to thank you for engaging stakeholders across the board for feedback and input on this revision and for doing your best in incorporating the 2012 Planning Rule.

We are writing to show our support and interest in this forest plan assessment and revision, understanding that a review of all aspects on our public lands is needed. A couple of general points: We support the position regarding the protection of wilderness values in agency-recommended and already designated wilderness. BCHCO requests that you continue to support the position that forest units must not designate routes or trails as open for motorized or mechanized vehicle use in agency-recommended and designated wilderness. Allowing motorized or mechanized vehicle use in these areas develops a constituency for the continuation of that use that potentially reduces the area's wilderness potential. It also diminishes the opportunity for solitude, degrades an area's naturalness and undeveloped

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character, and adversely affects the opportunity for historic and traditional wilderness recreation, such as hiking, horseback riding and packing, hunting, fishing and camping.

Both motorized and mechanized travel are non-conforming uses specifically addressed in S4(c) of the Wilderness Act. BCHCO requests that agency-recommended and designated wilderness be managed under the current requirements as designated wilderness, and “be administered for the use and enjoyment of the American people” providing solitude, primitive and unconfined recreation for historical and traditional recreationists.

In honoring this mandate, we trust that you will be guided by Congressional direction in House Report 95-540, which instructs “how the Wilderness Act should now be interpreted” as related to the wilderness trail system: “Trails, trail signs and bridges are all permissible when designed in keeping with the wilderness concept ... Trail construction or maintenance can include use of mechanical equipment where appropriate and/or necessary” for administration consistent with that purpose.

We believe the agency’s guidance for Forest Plan revisions must provide for a consistent strategy for protection of our nation’s National Scenic and Historic Trails (NS&HTs). National Forest System management of NS&HTs must be consistent within the USFS and between federal agencies and be consistent among USFS units along each NS&HT. In other words, the directives must be amended to ensure consistency and continuity in the management of NS&HTs from one forest to the next, keeping in mind facilitating preservation of resources deemed significant by Congress and that would promote consistency in the management of NS&HTs across federal agencies and their respective planning units. NS&HTs specific in this assessment are the Continental Divide NHT and Old Spanish NHT.

Following the 2012 Planning Rule, land managers should be looking towards achieving “the vision articulated in the 2012 Planning Rule – to protect and restore National Forests and Grasslands for the benefit of communities, natural resources and the environment.” Recreation is important, as well as preserving the health of our forests. “The 2012 Planning Rule requires that the development of plan components take into account opportunities to connect people with nature. It also requires protection and appropriate management of wilderness areas, wild and scenic rivers, other designated areas, cultural and historic resources, and areas of tribal importance.”

Part of BCHCO’s mission is keeping access open for all designated uses. We want to ensure that our historical use of our trail system and back country remain, keeping horse access open and available everywhere it currently is. We are pleased to see that horseback riding is a heavy use in this FS area and that you have recognized that in your assessments. We know it will continue to be. Keeping in mind the exponential population increase across Colorado, with Colorado growing the fourth fastest in population in the nation, it’s important to keep looking forward when planning for outdoor experiences. Trailheads must be designed (if new) or expanded (if existing) for the size of our horse trailers. As more places become more popular, our use is hindered by lack of space.

While we understand the immense pressures on land managers to create and develop more opportunities for the increasing demand of new uses and technology, more isn’t always better. Budget cutbacks have severely limited the management that should be taking place on our

public lands and issues such as beetle kill and wildfire should also be kept in mind. Sensitive areas, wildlife, historic use and user conflicts all need to be balanced with maintaining proper management of our public lands. Where areas have been traditionally multiple use, that concept should remain. ***No other resource, service or product derived from Forest System Lands touches the lives of more Americans nor has greater opportunity to foster citizen support than does the opportunity to choose from the variety of recreation settings necessary to enjoy a quality recreation experience.***

Providing the spectrum or variety of recreation settings necessary to meet the demand for quality recreation necessitates a conscious choice of how those healthy and resilient lands will be allocated and managed – decisions that ***must*** be made as part of a strategic land management plan.

We look forward to providing specific comments to areas by chapters local to those areas as well. Grand Mesa BCH has been heavily involved in this process and plan to continue that involvement. Back Country Horsemen of Colorado appreciate the opportunity to comment on this plan revision. Please place us on your mailing list for future mailings regarding this project.

Sincerely,

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