



Date: 12-08-2017

To: USFS, GMUG National Forest

From: Colorado Plateau Mountain Bike Trail Association, Inc. (COPMOBA)

Re: Draft of GMUG Forest Plan Revision

This letter is to comment upon the Draft Assessment Reports, as a part of the GMUG Forest Plan Revision.

The Colorado Plateau Mountain Bike Trail Association, Inc. (COPMOBA) is a five chapter non-profit organization based in western Colorado that advocates for, builds, and maintains singletrack trail in the region, in existence and cooperating with federal land management agencies for over 28 years. COPMOBA represents a large number of avid user of the GMUG forest in multiple areas.

COPMOBA's relationship with the GMUG Grand Valley District has been long running. During this time, the staff and organization have been very helpful and cooperative. We recognize and appreciate their professionalism, experience, and commitment to the management of our public lands.

The underlying realities of substantial pressures on the USFS managed public lands, and very challenging budgets, coupled with an expectation of expanding use and public numbers, are clear. The need is also clear to support this management plan revision with the best and most complete information available, and thorough public input. It is also clear that we must appreciate the much expanded social and economic role of recreation on USFS managed public lands. In western Colorado, recreation is recognized as a critical pillar in our regional economies. And outdoor recreation, often on public land, is a profoundly important element of the social fabric of the region.

With that in mind, COPMOBA offers a number comments about the general format of the current draft documents and about recreational information that is publicly available and which may substantially inform this process.

- **The timeframe available for public review and comment of these draft documents is very brief.** With such a large task as revising the underlying management documents of the GMUG, it's imperative to have a thorough review of the information and abundant time to provide comment. A 30 day review period, encompassing a national holiday period, is rather brief for the importance of the task at hand.
- **The narrative format of the document is a sub-optimal format for conveying the multiple resources, available assets, their characteristics, areas of overlapping resource use, etc.** Mapping and GIS data presentation is a necessity for clearly conveying both the available information and for illustrating management needs. Anecdotal comments provided throughout the document may add important perspective, but they are not sufficient for crafting positions on the management of our public lands.
- **From a trail based recreation perspective, there are multiple existing resources to aid in providing this spatial information.** These include, but are not limited to sites listed below.
  - [www.mtbproject.com/directory/8007418/colorado](http://www.mtbproject.com/directory/8007418/colorado)

- [www.singletracks.com/Colorado-bike-trails\\_6.html](http://www.singletracks.com/Colorado-bike-trails_6.html)
  - [trails.mtbr.com/cat/united-states-trails/trails-colorado/western-slope/pls\\_5843crx.aspx](http://trails.mtbr.com/cat/united-states-trails/trails-colorado/western-slope/pls_5843crx.aspx)
  - [www.trailforks.com/region/colorado/?lat=38.962573&lon=-108.265037&z=11&m=trailforks](http://www.trailforks.com/region/colorado/?lat=38.962573&lon=-108.265037&z=11&m=trailforks)
  - <https://cts.state.co.us/cotrex/desktop/>
- **The overall quantity and quality of recreational resources are not thoroughly defined and described within the draft forest assessment documents.** The GMUG forest holds a tremendous concentration of what are arguably nationally recognized, world-class recreational areas, terrain, sites, and resources in multiple sports or areas of pursuit. This information is not sufficiently identified within the documents.
  - **The identification of these assets, and the social and economic impact of these resources, are poorly represented in this assessment.** Outdoor Recreation contributes \$28 billion dollars annually in direct spending and supports 229,000 jobs in Colorado (OIA study, 2017). A recent Colorado Mesa University study indicates that three main trail systems (Tabeguache, Kokopelli, and North Fruita Desert) on public land in the Grand Valley alone generate \$12.5 million in economic activity. In The Benefits to People report, the estimate of recreation activity generating a combined \$32.2 million in labor income across all the forests likely woefully under represents the economic importance of recreation to the local communities.

In addition, comments more specific to trails, and trail based bicycle use are as follows;

- **Mountain Bike use characterization;** In multiple locations within the documents, mountain bike use, or users, are characterized in a manner consistent with the following as found in the 'Non-Motorized Trails' section on p-18;

"...many mountain bike users desire a rugged, thrill experience, which includes higher speed descents."

This characterization is also used when describing conflicts between user groups, p-36;

"Mountain Bikers have trended towards high adrenaline experiences with speed and thrills, which are incompatible with hikers or other non-motorized users due to safety."

While this statement may be accurate for some aspects of the mountain bike user group, it is not an all-encompassing character of the mountain bike experience on trail. Nor is the conclusion valid that this use is incompatible with other users due to safety. Proper trail design, signage, definition of acceptable use in various areas, and management of expectations are but some of the tools available to manage multiple use trails. There is no other characterization of the mountain bike activity/experience to be found in the document.

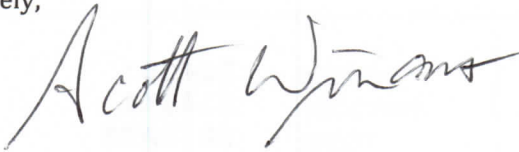
This characterization vastly undervalues and poorly identifies the goals, needs, and behaviors of the mountain bike user community. The mountain bike user community should be understood to include a wide variety of goals, skill types, preferred trail and terrain types, preferences for front-country or mid-country or back-country access, etc.

- **There are several goals for mountain bike trail access and use on GMUG managed lands.** Among many, these include needs for;
  - Long distance routes
  - Trail networks or systems that provide access to routes with varying skill levels
  - A focus on route or network connectivity to provide broad distance and diversity in route availability

- Overall expansion of non-motorized, bike accessible, trail mileage. Per the draft documents, of 2641 miles of 'terra' style trails, only 970 miles exist of non-motorized routes outside of wilderness areas. And of 980 miles of snow trails, only 140 are non-motorized (and not all of those are bike accessible).
  - Improvements to existing, and creation of new, trailhead facilities. Expanding use calls for better information and support facilities.
- Activity preferences on GMUG, Table 17, p-31 Recreation; **Bicycling**, along with Hiking/Walking, **shows the greatest participation increase** in the FY09-FY14 period. Bicycling has and continues to grow substantially as a user base, and this is well recognized in multiple areas served by GMUG; Grand Valley, Delta, Montrose, Ouray, Paonia, Gunnison, Crested Butte, Telluride, and others. Simultaneously, multiple pursuits such as downhill skiing, wildlife viewing, relaxing, cross-country skiing, and fishing, show commensurate or larger declines in participation over the same period. Responding to this change in use patterns is important to efficiently applying resources of the forest to the areas that are receiving great interest and need.
  - In earlier Travel Planning efforts, in 2002 for the North Uncompahgre, for instance, multiple trails were closed to mountain bike access. **At a time when mountain bike trail use was expanding dramatically in the region, many miles of existing trail were excluded from bike (non-motorized) access.** This appears to be planning that was not well informed about bike (non-motorized) access and interests in the forest at that time. COPMOBA advocates that this trail access planning process should be reviewed in light of user interest, and that the Forest Plan should reflect the intention to do so.
  - **Trail Conditions, p-35, Recreation;** maintenance is lacking on non-motorized trails, and is being accomplished, in part, through partnerships. Mountain bike groups are specifically mentioned as being very active in trail clearing and maintenance. COPMOBA has a long standing MOU with the GV District pertaining to trail maintenance, and considers this an important cooperative effort.
  - **User created trails, p-37, Recreation;** “Most unauthorized user-created trails result from bicycle users and OHV users” COPMOBA disagrees with this assessment within our region of experience. To our knowledge, no unauthorized bicycle created trails have been noted on the north end of the Uncompahgre or on the Grand Mesa since the Mechanized Travel Decision went into effect on the Grand Mesa a few years ago. Is there any documented information/data to support the stated conclusion?
  - **Motorized and Non-Motorized Recreation, p-38, Recreation;** There are also needs for additional non-motorized trail development in several areas. Proposals have been made for new non-motorized routes or networks in the Grand Mesa, Montrose, and Ridgway areas, all of these associated with COPMOBA.
  - **Travel Management / Trails Management, p-49, Recreation;** As noted earlier, a review of earlier trail closures to mechanized access is important. In addition, addressing fully the growing need for snow bike access is important - the use level is increasing. Combining snow bike use with motorized use raises a safety concern due to the large disparity in vehicle speeds. Additionally, non-motorized snow bike users often seek an environment of solitude as opposed to the noise and smell of motorized machinery.
  - **Recreation Settings, p-51, Recreation;** As noted earlier, the supplementary databases noted may aid in establishing a valid ROS map for the process.

Thank you for the effort and insight involved in creating the draft documents. Please accept these comments in the effort to more thoroughly reflect the goals and knowledge base of a portion of the mountain bike trail user community of the GMUG managed public lands.

Sincerely,



Scott Winans  
COPMOBA President

