



Date: May 31, 2018

To: USFS, GMUG

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

Re: Comments on GMUG Forest Plan Revision - Scoping

The Colorado Plateau Mountain Bike Trail Association (COPMOBA) is a member-supported, nonprofit organization dedicated to advocating for, building, and maintaining sustainable non-motorized single-track trails in Western Colorado. COPMOBA, through its 5 chapters, has partnered with the U.S. Forest Service for 29 years to develop and maintain singletrack on the Grand Mesa and Uncompahgre national forests.

Attached are comments regarding the general revision of the GMUG Resource Management Plan and the overall approach to future management of the Grand Mesa, Gunnison and Uncompahgre National Forests. The GMUG hosts some of the most popular and frequently-visited mountain bike trails in the western United States. Overall, mountain biking in western Colorado is a significant economic driver, providing a huge financial benefit to local communities. Forest Plan revisions should recognize that significance and propose a plan that will maintain, protect, and provide for the planned development of non-motorized trail resources. Non-motorized trail maintenance, re-routes, and new trail development should be a priority.

- Part I: Vision, Roles, and Contributions - The scoping document recognizes the importance of recreation as a critical economic contributor to the region's broad-based tourism industry. Diverse recreational opportunities also contribute to healthy lifestyles sought by many residents and visitors. A thoughtful balance must be created that weights the benefit of extractive uses to the impacts those uses will have on natural processes and recreation. COPMOBA emphasizes the need for dedicated non-motorized recreational resources and planning as an important element of the *public enjoyment and commodity use and community connections*. Mountain bike trail use has expanded dramatically since prior GMUG forest planning documents were created. COPMOBA recognizes the importance to our communities of this activity from both economic and quality of life perspectives, and encourages that the planning process reflect this reality.
- Part II: Key Needs for Change - COPMOBA supports the adaptive management direction and processes to improve both flexibility and durability in the effective use and protection of the GMUG forest via this revised plan.
 - COPMOBA supports and concurs with bullet points # 1, #2 and #3 of the Contribute to Social and Economic Sustainability section. While the landscape level planning to support adequate motorized recreation opportunities is explicitly identified, there is a glaring lack of identification of the need for planning for non-motorized recreation opportunities. The scope of work should include development (creation and maintenance) of non-motorized trails and trail resources suitable for mountain bike use in areas with existing non-motorized trail resources, and also in areas that currently do not have such resources. In view of the substantial increase in use of the Forest by mountain bikers over past decades, and the continuing increase in participants in this sport, the development of new non-motorized trails open to mountain biking, and consideration of opening existing non-motorized trails to mountain bike use, should be addressed. Examples of areas falling within the scope of this need include the South and North ends of the Uncompahgre Plateau.

- COPMOBA supports bullet point #1 of the Integrate Resource Management of Multiple Uses section. COPMOBA supports the use of ROS primitive and semi-primitive areas by mountain bikers and sees no conflict with that use in the management of wildlife habitat.
 - In the "Provide for Ecological Sustainability" section, or elsewhere in the Plan Revision, trail conditions that aren't meeting sustainability goals, i.e. fall line grades, sensitive areas such as wetlands, should be addressed via broad planning goals. Trail-influenced erosion may be degrading soil and water quality. COPMOBA is willing to work with the Forest and other trail user groups to address challenges posed by trail influenced impacts.
- Part III: Management Area Framework - COPMOBA recommends that in the Backcountry and Recreation Focus Areas that those areas be given a "suitable for mountain bike use" designation, especially where areas currently exist that have trails open to mountain biking. The growth of mountain biking and non-motorized trail based recreation should be considered when planning for trails. A focus on trail quality, and access to a variety of terrain type, skill level, and user experiences, is important to overall trail planning efforts. Generally, COPMOBA prefers administrative management that protects natural processes over the legislative process, since designated wilderness prohibits mountain bikes. Any discussion regarding wilderness area or boundary designation or changes should include representatives from the mountain bike community.

In addition to the consideration of the status of the Scoping phase of the process, further review of the Draft Assessments (Recreation) has been considered by portions of the COPMOBA organization. If further comment on the Draft Assessment phase is possible, please consider the following:

The Ridgway Area Trails (RAT) chapter of COPMOBA has worked consistently to provide trails for Mountain Bikers, Hikers, Trail Runners, and Equestrians, representing hundreds of local community members and many more from the Western Slope of Colorado. RAT also provides trail use and etiquette education for our community, in conjunction with other local organizations. Our sponsored trails see many thousands of annual user visits. Use is increasing at a rapid pace, indicating a strong need for additional sustainable trail systems.

The RAT chapter has recently commented on the Draft Assessments (Recreation). After further review of the Revised Draft Assessments (Recreation) March 2018 we have additional comments:

- In Chapter one, regarding information gaps - additional language was added indicating that information related to the condition of trails was "not currently in a system where it is easily useable", but that you "have been gathering information in some places". Since this is not a very specific statement, can you please elaborate on what kind of information you do have? RAT can assist in assessment of trail conditions in some places and would like to offer the information we have for this revision process. Of course, the information collected is consistent with your own Forest Service Handbook 2309.18. Curiously, when you collect information do you follow Forest Service Handbook 2309.18? It seems critical to understand first what you have on the ground before making a decision on how it is to be managed. Of course if you have information as indicated in the Revised Draft Assessment, we would like to understand what that is, as it pertains to trail conditions. We would like the opportunity to review a map of known trail conditions. The RAT Chapter of COPMOBA feels this would be helpful since all chapters of COPMOBA should be considered as resources regarding trail conditions. After some discussion, RAT feels strongly that a lack of knowledge of trail conditions directly effects the way it handles partnerships or a willingness to embrace partnerships as a resource, which we will speak to later in this letter. The Revised Draft Assessments should include a discussion of the work being done by the public or partners regarding trail maintenance.
- In Chapter two, there is considerable discussion regarding Recreational Opportunity Spectrum (ROS). You have mapped the ROS as stated in this chapter and how you arrive at an answer. What RAT feels is important to understand however is, how the ROS and related Standards and Guidelines are currently being managed. To that end, how many of the Grand Mesa, Uncompahgre, and Gunnison's National Forests trails approved by current Travel Plans, fall within the current 1991 Amended Land and Resource Management Plans ROS guidelines and standards? Under the inventoried existing summer ROS, how many miles of trails currently comply with the 1991 Forest Plan ROS class designations?

How do you plan on using existing ROS and subsequent Standards and Guidelines moving forward within the scope of this plan revision process? You indicate that you have observational information regarding certain aspects of visitor use as it pertains to capacities of the ROS and classifications of uses in people at one time (PAOT). What observational information do you have? Specifically, we would like to know if and where your current trail systems are exceeding or meeting your (ROS, PAOT) standards and guidelines. For example we can believe that the Blue Lakes trail and the area around Blue Lakes exceeds 30 trail and camp encounters (current Forest Plan direction) and on some days over 100. It is easy to understand that the Blue Lakes trail also exceeds both PAOT for trail miles and area-wide acres. Why this is so important to RAT is our goal is to see additional opportunities for high-density looped-single track. For the ROS of Semi-primitive non-motorized, the current limits would never allow for any future opportunity. For example the limit of 1 mile of trail under Semi-primitive Non-motorized is a maximum of 11 people per mile or 51.2 people per square mile. A sustainable, high-density, looped single-track system of trails such as on the BLM's RAT system far exceeds this maximum standard. Sustainable, high-density, looped single-track trail systems are highly desirable by our members and the general public, and offer a much different experience to what is currently available.

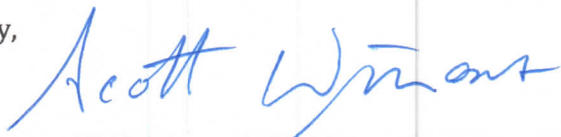
More generally, a variety of trails on the National Forest are used to a greater or lesser degree. Understanding which trails experience what magnitude of use, and how the level of use has changed over time, may be aided by a ranking system and mapping of such information. RAT has site specific information which can help with such an assessment.

- Declining fiscal resources both in funding and personnel are identified in Chapter 7. While RAT agrees that as stated in Chapter 5 "non-motorized trails in particular need increased attention and maintenance" we take some issue with the statement that "relatively little funding exists from outside groups". This statement is simply not correct. We have the ability to bring significant resources to bear for both new trail construction and maintenance for non-motorized single-track. Further in Chapter 7 it seems that you indicate a substantial cost exists when working with partners. We feel at least in terms of the various COPMOBA chapters and specifically RAT, that partnerships are implemented inconsistently across each of your Ranger Districts. This has resulted in missing benefits from third parties such as RAT including; bringing staff expertise for layout and design, contracting, environmental planning and analysis, and funding. Simply we believe that partnerships help reduce the overall cost of maintenance and construction of non-motorized single-track or any other user group trail system.

Finally, the RAT chapter of COPMOBA is concerned with some of the language in Chapter 7 regarding partnerships. While the Revised Draft Assessment clearly shows a need for partnerships, we feel you may be building a case for limiting the scope and role of these partnerships as they pertain to recreation uses, or at least a misunderstanding of what assistance and resources may be provided. COPMOBA encourages a strong commitment to building partnerships in the Forest Plan Revision process. For the recreation specific assessment, we would like to see Chapter 7 show this ability of partnerships to provide much needed resources to the GMUG National Forest, especially where non-motorized single-track is concerned. We have these resources now, and it is information which was missed and should be included in this document.

COPMOBA encourages the consideration of the above comments, and appreciates the opportunity to continue our partnership with the USFS in all aspects of the Forest Plan revision process.

Sincerely,



Scott Winans
COPMOBA President

