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Comments: Assessment GMUG Forest Plan Comments

Attached and below are the comments from the United Four Wheel Drive Associations, Colorado Association of Four Wheel Drive Clubs, Inc., and Grand Mesa Jeep Club.

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RE: Forest Plan Revision

As a member of the Board of Directors for the United Four Wheel Drive Associations (UFWDA), Colorado Association of Four Wheel Drive Clubs, Inc. (COAFWDC), and Vice President of the Grand Mesa Jeep Club (GMJC), I submit the following comments regarding the GMUG Forest Plan Revision.

All three of these organizations work valiantly to maintain many of the 4wd trails around western Colorado. This year, the Grand Mesa Jeep Club members have accumulated 5661 volunteer hours in this effort. The COAFWDC normally turns in near 20,000 hours.

It is the organization's belief that the whole of the US National Forest Service (USFS) has lost sight of their original forest management direction and mission. This is a gradual systematic change that began in approximately 1964 and has been growing at an increased pace since that time.

2012 Forest Planning Rule - Part 219 - Planning - Subpart A-National Forest System Land Management Planning

§ 219.1 Purpose and applicability.

b) Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531) (MUSYA), the Forest Service manages the NFS to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources.

(f) Plans must comply with all applicable laws and regulations, including NFMA, MUSYA, the Clean Air Act, the Clean Water Act, the Wilderness Act, and the Endangered Species Act.

In 1964, Congress passed the Wilderness Act. This was the beginning of the present day "Environmental Movement".

Even though laws such as The National Environmental Policy Act (NEPA), the "National Forest Management Act

of 1976", Multiple-Use Sustained-Yield Act of 1960, Endangered Species Act (ESA), and others dictate that the Secretary of Agriculture develop and administer the renewable resources of timber, range, water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services, "preservation and protection" of our National Forests has become the overwhelming focus of the USFS.

In most regions of our National Forests, it takes about 50-years for an average tree to mature. In the 50+ years since the Wilderness Act, many changes in forest management have been made. Most of them have occurred at such a slow pace, they have gone largely unnoticed by most. Management's focus has gone from one of "Multiple Use and Sustained Yield" to one of "Preservation and Protection".

The proof is easy to see if you look at all the things that are now allowed in Congressionally designated Wilderness that the original Wilderness Act would have eliminated immediately. The major definition of Wilderness; "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." has been so diluted that only Interstate Highways and high-rise buildings are not allowed. These changes have come by way of unwise and prejudicial "Rule" changes, NOT law.

Present Wilderness Study Areas contain old logging sites, various irrigation systems, buildings, roads, trails, mining digs, and other "man-made" instances. Some of the roads that encroach into Wilderness even have vehicular gates and signage stating "Route Closed". This was NOT the intention of the Wilderness Act of 1964.

In the 1980s, one of the major management tools of the USFS was largely curtailed. The logging industry was nearly put totally out of business in the name of "Preservation and Protection". The results of this are just beginning to show.

Most of our National Forests are all maturing at the same time. Mature trees are far more susceptible to drought, insects, disease, and wildfires.

While the organizations believe that the GMUG NF is doing a fair job of controlling insect infestations compared to other forests, this is only treating a symptom of the problem. An overall healthy forest would be better able to naturally combat beetle infestations.

The watersheds are suffering because there is no emergent growth to stabilize the soils and hold the ground water as nature does.

Wildlife habitat is in poor condition because the forests are largely all in the same term of growth. A healthy forest is diverse in its levels of growth. There are new growth areas intermingled with medium and old growth. This is how wildlife habitat is supposed to be. § 219.9 Diversity of plant and animal communities.

#### § 219.10 Multiple use.

While meeting the requirements of §§ 219.8 and 219.9, the plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as follows:

(a) Integrated resource management for multiple use. The plan must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area. When developing plan components for integrated resource management, to the extent relevant to the plan area and the public participation process and the requirements of §§ 219.7, 219.8, 219.9, and 219.11,

Wildfires now burn so intensely that everything is incinerated. Not one living thing survives in huge areas.

Erosion and pollution amounting to more than what all the tires ever produced now takes place every year in burned areas. More silting and erosion into streams and rivers from one fire occur than from all the old forest roads and trails combined.

In a healthy forest, islands of green growth are left in the wake of a fire from which Nature can reforest. Seeds that require heat from a fire to begin their germination are brought to life. Wildlife can survive on these islands in the interim.

Presently, nearly 60% of the USFS annual budget is used for wildfire suppression. Imagine what GOOD could be done with even half of that money.

Managed properly, reintroducing logging practices is the only way that will return our forests to being healthy. The wisdom of Multiple Use and Sustained Yield can be the right "medicine" if the USFS can break away from its present "Preservation and Protection" mode of operation.

By allowing the existence and access to a sustainable forest road and trail system, forest management, wildfire management, grazing, mining, firewood gathering, and recreation can all benefit.

Closure and decommissioning of roads and trails without replacement of those routes concentrates use onto the few designated routes left open. This concentration results in degradation of those routes and over use of the surrounding areas because there is nowhere else for the majority of people to go.

In many cases, the decommissioning and obliteration of roads is used as a "manufacturing" of Roadless Areas, which will eventually be "studied" for Wilderness Characteristics. Areas that could not pass past "studies" are now passing without question. Manufacturing Wilderness is NOT one of the legal functions of public forest management.

The organizations ask in the strongest terms that the USFS return to the original mission of Multiple Use and Sustained Yield and stop the "protect and preserve" mentality that currently prevails.

Further, we ask that the USFS work with the logging industry to provide a long-term supply of logs, whether they be salvage or timber for lumber. The USFS must give the logging industry a firm reason to reinvest in reopening mills and logging operations. The overall health of our National Forests is dependent on bringing a sustainable logging industry back from the ashes.

As access roads for the logging operations are built, we also strongly suggest that they be built with other uses in mind. Fire suppression requires access. Hunters and fishermen require access. Firewood gatherers require access. Campers require and desire access to remote areas where they are not along a main thoroughfare. Safety of campers is increased by not having them right on a main road. Recreational motorized uses want to have access to historical sites and destinations with scenic values.

Rather than closing roads and trails (motorized and non-motorized) in a quest for more "Roadless Areas", the USFS should be looking for ways to increase access for the growing population and numbers of users. This is what Multiple Use and Sustained Yield is all about. Promoting recreation rather than limiting it is proper management.

Currently, the GMUG works very closely with the Western Slope ATV Association and the Colorado Plateau Mountain Bike Association in creation of new trails. The organizations would encourage the GMUG to work closely with the Grand Valley Trails Alliance (GVTA) in the future.

The GVTA is a group of ALL trail user groups in the Grand Junction area. They have found that working together

is beneficial to ALL trail user groups and land managers have found value in working with one entity rather than hundreds of individuals and several user groups to the same end.

The organizations ask of the USFS and GMUG that there be a reasonable and set value for Special Recreation Use Permits. It is not reasonable to expect forest users to apply for permits not knowing what the cost will be until the event is complete. Budgeting for an unknown is not possible for most non-profit organizations.

Many of those organizations provide numerous volunteer hours that are seldom rewarded by public land management. Maybe some kind of "payment in lieu of services" arrangement could be worked out to help with the expense of these SRUPs.

As we all know, signage on USFS roads and trails are often used for targets and other abuse. The organizations would volunteer to help with the upkeep, installation of, and maintenance of USFS trail signage. The USFS would gain from the volunteer labor and the forest users would gain from the use of readable signs.

The organizations would request that changes be made to the Motor Vehicle User Maps (MVUM). By ONLY showing the roads and trails on USFS land, (stopping the road at any non-USFS land), many instances of people not knowing where they are on a map occur. By showing the ENTIRE road or trail, users have a much better knowledge of where they are and if it is a legal route for their mode of travel.

If areas or trails have a name other than the FR###, they should also appear on the map. County Road numbers and other identifying marks will greatly enhance the use of the maps. It is our understanding that keeping people on the right roads and trails is the aim of printing maps, why not provide identifying details for reference?

The organizations understand that working with a government entity can be a long and tedious process. With limited manpower, volumes of laws, rule, and regulations to work through, few things can happen on a timely basis. But when volunteers are available and willing to work, there must be a way to speed up the process.

We would strongly request that the USFS look for some kind of compromise in the system that would allow for volunteers to do at least some of the work projects without the usual "hurry up and wait" that the government is so well known for. Surely there must be ways of making things happen while the manpower is excited about getting to work.

The members of these organizations enjoy historical sites on National Forests. Things like old cabins, mining sites, and other like places are highlights of forest exploration.

In many national forests around the country, the demolition and removal of these sites is occurring at an alarming rate. Some of these sites could be maintained, even in a poor condition, with little work.

In some cases, volunteer work could provide for at least short-term preservation of these sites. In other cases, grant money might be found to provide the materials and possibly some labor to refurbish the sites. Cooperation of the GMUG would greatly help in the organizing and work to accomplish this effort.

The organizations have members who enjoy the national forests for their natural beauty, but would be more enthusiastic about venturing into the GMUG if more 4wd roads were more challenging (primitive).

Several of the primitive roads once available to full-size 4wd have been closed to them in favor of ATV trail creation. While we also support ATV trails, converting 4wd roads to <50" trails does not set well with our membership. As the "top-of-the-food-chain", full-size 4wd roads are there for ALL other user groups to use.

We willingly share the roads with every hiker, biker, equestrian, ATV, UTV, and motorcycle. Losing trails to other

user groups at the exclusion of our use is incredibly hard to deal with.

We ask that due consideration be given to reopening some of the former 4wd roads and trails to full-size 4wd use. 4x4 trail access is the only way we find using the GMUG enjoyable. We have shown our dedication to the GMUG with volunteer hours maintaining the few full-size trails presently available to us.

About the United Four Wheel Drive Associations.

The United Four Wheel Drive Associations are a non-profit corporation organized for the purpose of promoting the continued growth and organization of recreational four wheel drive motor vehicle activities and maintaining access for recreational opportunities through education partnerships, stewardship and political awareness.

Respectfully submitted by,

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Happy Trails to you.