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Comments: FW: GMUG Comments

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Caring for the land and serving people

From: Steve Chapel [mailto:[dirtuser@bresnan.net](mailto:dirtuser@bresnan.net)]

Sent: Wednesday, May 30, 2018 3:22 PM

To: Staley, Samantha J -FS <[samanthajstaley@fs.fed.us](mailto:samanthajstaley@fs.fed.us)>; Me <[dirtuser@bresnan.net](mailto:dirtuser@bresnan.net)>

Subject: GMUG Comments

Samantha,

I have been unable to copy and pastes or attach our comments via the comment page so I have attached them here. Please add them to the comment file.

Steve Chapel, WSATVA

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WSATVA Comments on GMUG Forest Plan May 30, 2018

The Western Slope ATV Association, which provides more summer volunteer time to the Grand Mesa & Uncompahgre Plateau than any other volunteer organization, offers these comments on the GMUG Forest Plan:

#### Dispersed Camping:

Not enough sites in the Hightower area as well as other parts of the GMUG. Closing dispersed sites will have a negative effect unless more sites are opened. The fewer sites there are, the faster they will degrade. When you reduce sites you cause over use of the remaining sites. If the FS does not create or allow new sites the public will continue to do it for them.

#### Motorized Use:

There is a lack of reasonable alternatives to address the public's need for more motorized access and motorized recreational opportunities. There are over 50,000,000 OHV recreationists in the United States and over 1,000,000 OHV recreationists in Colorado. Your analysis does not include an alternative that would provide a reasonable level of motorized trail opportunities to meet the existing and future needs of OHV recreationists. The agency needs to identify the needs of motorized recreationists and OHV recreationists including those motorized recreationists that the process does not accommodate and reasonably provide for those needs. Again, reducing the trails and areas of OHV use causes over use of those areas.

There should be consideration for motorized trail riding opportunities for the disabled, elderly, and veterans. This aspect has not been given a look. Ignoring the elderly & disabled in the forest is old school and needs to change. It is called discrimination and to continue it will open the door to more lawsuits.

The Forest Plan fails to adequately address the Impacts on, and benefits of motorized recreation on the Human environment. A healthy human environment includes adequate motorized access and motorized recreational opportunities as required to meet the needs of the public. With the forest plan the public is losing a lifetime of motorized access and motorized recreational opportunities for reasons that are not significant when judged by an unbiased mindset. Many of the trails and campsites that were in use prior to 1990 have been closed simply because they existed. The more areas that are closed off to OHV use the more you encourage over use of the remaining areas. Twenty years from now there will be fewer "on the ground" use of trails because technology will at some point switch to hovering across the lands or some other similar new technology.

In the final plan motorized recreation should not be prohibited from areas of special environmental concern, sensitive soils, habitat of threatened or endangered species and the proximity of primitive recreation areas.

The motorized closure trend which has been pushed by environmental groups & enacted by the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests is destroying a culture which is based on motorized access and motorized recreation in the forest. The public has been squeezed into too small of an area with too few motorized routes. We continuously talk to fellow motorized recreationists, they ask us where they can go to ride trails and camp and in particular, ride FROM camp. There is a great need for more motorized connection routes between existing routes. If this were done or allowed to be done on the Grand Mesa and the north end of the Uncompahgre Plateau It would offer tremendous variations of use for not only the recreationists of all types but for hunting and fishing also.

The agency has not develop any long distance trail systems for motorized recreationists as they are now doing for non-motorized use (Palisade Plunge bike & hike trail). Long distance motorized trail systems would see far more use than non-motorized trails. It would spread the use out and rid areas of congestion that shows up on some trails today. Long distance motorized trail systems would provide far more benefit to the human environment including economic benefit.

The agency should listen to & address the needs of the silent majority including motorized recreationists and OHV recreationists and reasonably provide for those needs. There is not an equal opportunity in miles of trail and quality of experience for ATV recreationists.

The forest service overstates the Impact of motorized access and motorized recreation on fish and wildlife. The analysis has not adequately considered data and studies that supports an unbiased and a balanced view of how motorized recreation impacts the natural environment. It instead has been based solely on the feeling of CPW officers who are not even in areas of our concern as often as our own members. (Flat Tops region south of Vega Sate Park)

The forest service does not tell users why there is width restrictions such as a 50 inch or less user route in the forest. They should devote a paragraph to this topic and explain that in many cases the route would be impossible to maintain if larger vehicles were allowed on it and subsequently it would be closed. The public needs to know why 50 inch routes exist and why all vehicles are not allowed to go on every route.

There has been discussion on the possibility of widening 50 inch routes to accommodate wider UTVs. This is not an acceptable alternative with the less than 50 inch user group. There are fewer 50 inch routes in the forest than any other user route. If the forest service wishes to accommodate the wider UTV group they should do so with a combination of new construction and the renaming of existing routes to whatever width they choose. The

drawback to picking a separate UTV width trail however, lies with the wide variations of width with UTVs. Different manufactures all have different widths ranging from 54 inches all the way up to 72 inches. A 60 inch wide vehicle will change to a 62 inch wide vehicle with a different tire or wheel change. It would be an impossible solution to try to solve as someone will always be calling for a wider route. Many routes in the forest cannot accept a wider than 50 inch machine without destroying the route with extreme resource damage. A more reasonable solution would be to rename the 4 X4 routes as UTV/OHV routes.

The road density impact criteria being used grossly over-estimates the impact on wildlife. The road density impact criteria being used is not a reasonable measure of motorized impact on wildlife habitat. A motorized trail does not have the same impact on wildlife as a road. The impact analysis assumes one size fits all. A criteria and impact analysis must be developed that differentiates between different treads and level of use. OHVs cause less severe disturbance of wildlife because the relatively low level of noise that they emit provides a soft warning of their presence and especially compared to non-motorized recreation. For example, OHVs have never had a damaging encounter with a grizzly bear while hikers and hunters have had many that have ended badly for both the humans and the bear.

Noise pollution is becoming less & less of a problem because manufactures are making OHVs quieter with every passing year. This is not a viable issue for multiple use lands.

Timber & Fire:

The timber & fire planning teams need to work closely with recreational planners to prevent the destruction of trails that has been occurring in the Grand Mesa & Uncompahgre National Forests. A little communication for planned timber harvests & controlled burns could eliminate their encroachment on trails by moving boundaries, in some case just a few hundred feet. The way it currently works the destruction of the trail is usually found by a user group and then it must be re-defined at a cost to recreation and their partners. Timber harvesting & thinning are creating wonderful new forests and should be continued with better planning as mentioned.

Wilderness:

The Forest Plan over-represents the public's need for more wilderness. Less than 3% of the visits to the forest are for wilderness recreation and 97% of the visits are

for multiple-use. The forest service should reflect the ratio of visitors and meet their needs in an equal manner.

Current wilderness is poorly managed and to create more only compounds the problem. The current planning process is being used as a backdoor process to create defacto

wilderness areas by closing motorized access and motorized recreation on lands designated for multiple-use. Many roads & trails have been closed due to wilderness designations. Many of those routes could have been cherry stemmed open and should be in the future. We support removing Wilderness Study Areas from the

GMUG's inventory. These areas were never

intended to be maintained in limbo and managed as if they were wilderness.

Mineral Extraction:

Drilling for oil & gas as well as other mineral extraction should be based solely on the availability of the product. It does no good to drill in an area that is acceptable to an environmental group but contains no resource.

Finally:

Global warming & climate change are referenced often by the extreme left. When decisions are made in accordance with climate change then those decisions need to be reversed when the global warming hoax is exposed in the future.