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Title:

Comments: GMUG Forest Revision Comments

Please find attached comments on the GMUG Forest Revision process.

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Thank you for the opportunity to comment on the GMUG National Forest Pre-NEPA Draft GMUG RMP

Background

The Thunder Mountain Wheelers ATV Club or ([ldquo]hereinafter referred to as

([ldquo]TMW[rdquo]) represents approximately 450 people and businesses on the Western Slope of Colorado, mostly in the Delta and Montrose County areas who enjoy recreating on our public lands with off highway vehicles. TMW is a volunteer based non-profit environmental concerned organization that has focused on preserving and enhancing the opportunities of all OHV users in the local area since 1990. TMW enthusiasts provide not only thousands of volunteer hours, but have contributed literally \$1.5 million dollars over the years to public lands, through the Colorado[rsquo]s Parks & Wildlife OHV Registration and Grant Program.

It is important to note that TMW doesn[rsquo]t expend its energy opposing other forms of recreation or user group, or try to undermine other activities on public lands. We recognize the diverse interests and needs of all Colorado residents and applaud, rather than oppose them.

TMW acknowledges the challenges and complexities in preparing a Resource Management Plan in trying to balance the diverse interests of the public, while protecting our natural resources. TMW welcome the opportunity to provide our input prior to the commencement of the formal NEPA process governing development of the RMP. TMW and its members respect the planning team and their efforts to provide the information necessary to allow the public an opportunity to comment and provide data to assist the decision making process.

SPECIFICALLY

TMW would like to express our concern on a possible organized effort originating from the Paonia area to flood the revision input process with anti-motorized comments for the ROS around the Paonia area. Their effort is to influence the Forest Revision Plan to set the stage for future travel planning process to non-motorized management per the Revised Forest Plan. We stress that the Forest Plan guides resource management and is designed to supplement, not replace establish travel management guidelines.

Public Review

TMW was surprised when the process took a different approach and allowed the opportunity to review and comment on the draft RMP before the commencement of the formal NEPA process took place. It is obvious that this extra step will have a positive effect and very possibly reduce and avoid unnecessary conflicts during the formal NEPA process. In the past we have been involved in the planning process where conflicts and oversights could have been reduced before the NEPA timeline is started. Many times these inconsistencies have strained partnerships with the Agency and all efforts to avoid such need addressed. We feel this step sends a positive message to the general public that the developing a fruitful RMP for the GMUG is a high priority.

We were pleasantly surprised at the shorter version of the RMP when compared to other GMUG plans and BLM releases. Previous plans have yielded landscape plans that were very long and fill with minute detail. Such has proven to a significant road block to public participation in the planning process because most of the public lack the time or resources to review these large planning documents causing the public to oppose the plan simply for that fact.

Maps

TMW really struggled with maps. The pdf format was different that the on-line interactive mapping. We are unsure why there would be a difference in the amount of detail available between the two platforms, but each platform should be providing similar levels of detail for the planning process. They were sufficiently lacking in landmarks and topography to review and make a meaningful comment. We understand that the Forest Service

has moved to on-line mapping which is generally useful in local issues or concerns but is lacking when working at the RMP level.

Travel Management /Suggestion & Observation

We are aware that travel management will always be a part of and in the forefront of any [ldquo]Forest Level[rdquo] planning process. Having participated in both the Forest Service & BLM planning processes it appears to us that where the BLM has moved away from preparing [ldquo]Field Office[rdquo] level travel plans and now have travel management planning being done on a more localized level. This has proven to be very fruitful process in developing high quality recreational opportunities on the ground and avoids the situation where areas are overlooked or routes are simply dropped from review due to the fact they were omitted or overlooked from the mapping process. Moving travel management to a more localized level also allows for far more detailed public input and discussion in the travel process, which results in better long-term support the planning process.

We are unsure if this type of management process is even available in the USFS or if the GMUG could move to this type of travel management process at this point in their planning process. If possible it would have our support to move travel management to at least a Ranger District level. This would allow managers to more effectively address issues on a specific Ranger Districts where travel management may be issues. It seems there need to more flexibility in ROS management standards.

Concern

TMW members explore considerable riding opportunities in the Gunnison area specifically but not limited to the Taylor Park area. We would like to express our concerns on the Gunnison Public Lands Initiative ([ldquo]GPLI[rdquo]) process. It has been our observation this effort did little in involving the public to develop a plan for the Gunnison Valley that affected numerous user groups. It appeared there was an effort by GPLI to create the appearance of considerable public involvement in their agenda that was developed by them prior to any public involvement. In an effort to make contact with GPLI such efforts by TMW fell on deaf ears. We were never able to obtain meeting places or agendas or even establish a line of communication. GPLI continues to assert that the motorized community supports the conclusions that have been reached. We are simply unsure of how that conclusion was reached.

We are aware that many of the county officials representing counties adjacent to Gunnison County, specifically

Delta County have overwhelming opposition to the GPLI proposal. Rather than engaging with these counties to address concerns, GPLI representatives simply reduced the proposal to Gunnison County lands only. For reasons that remain unclear GPLI simply assumed that management of public lands on the boundary areas of Gunnison County would not impact adjacent lands in other counties. That assumption has proven to be less than accurate and has resulted in significant conflict between the counties that never existed previously.

Presentation materials /vs/ RMP standards

TMW participated in the Hotchkiss public meeting and found that on several issues the presentation materials for the public discussion did not match the standards for that issue provided in the RMP. TMW is aware that the pre-NEPA public review of the GMUG plan is a new step in the process and that is what contributed to possible conflicts between public materials and the RMP and such issues would be resolved prior to the NEPA process commencing.

Designated Trails

Having participated in all 5 resource management plans on the GMUG, TMW finds the [ldquo]Designated Trails[rdquo] requirements on each District vary and seem to not have a standard throughout the GMUG. The provisions don[rsquo]t seem to be a desired condition, standard, guideline or in any way fit with the rest of the management planning efforts. Some Districts have strict rules to limited [ldquo]Designated Trails[rdquo] to 50[rdquo] or less while other Districts don[rsquo]t seem to care on way or another leaving an arbitrary nature of the current standard. As a vision for Forest Revision the standard should be universal.

Flexibility in ROS Standards

Recreation Opportunity Spectrum (ROS) process should play a much larger role in the new planning rules than it has in the past. Currently the ROS definitions in the GMUG are exceptionally ridged and very likely would result in the unnecessary loss of routes from inventory issues and no doubt would become more significant over the life time of the RMP. Some flexibility is necessary to address issues like reroutes, boundary areas, expansions of trailhead facilities and the ability of the local land managers to address landscape level changes on the forest. Our past experience tells us that even the best inventory of routes misses some routes, and it has been our experience that sometimes these routes are very important to access other routes already in use. A more flexible ROS process could easily remedy these issues and keep public support /vs/ conflict.

Continued Partnership

TMW along with other OHV clubs on the GMUG over the years has brought to the table substantial financial contributions through the CP&W grant program for the sole purpose of protecting the resources that we use. The Forest Revision process must have a high priority in the continued partnership with such organizations to maintain the ongoing program of protecting the resources that we use. In addition the CP&W grant program makes substantial financial contribution to the Forest Service via the [ldquo]Good Management[rddquo] grant program. With the always limited budget within the Agency the Forest Revision process should reflect letting us help you in the Protection and Stainability of the forest.

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