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Comments: GMUG Final Input - Judson Morhart - CQR ATV Club

Introduction

As the Information Officer for the Colorado Quad Runners (CQR) ATV club, I have been involved in the GMUG planning process since it began back in June of 2018. I have written and sent comments and concerns with each iteration of the management planning process. During the past 90-day period, I have attended two of the 4 webinars, read all recent PDF updates and sent input to the planning staff.

Comments about the Desired Conditions and the Transportation System

My current comments will be directed primarily at only one of the four of the primary "Projects" of the Forestwide plan (as described in Chapter 1, page 1 of the Draft Revised Land Management Plan" - Travel Decisions. Within this "project" there are four components, desired conditions, objectives, standards and guidelines. I will only address the plan component titled - desired conditions.

On page 4 of the draft plan there is a working definition of "Desired Conditions".

Desired Conditions

The 2012 Planning Rule states, "a desired condition is a description of the specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates." (36 CFR 291.7(e)(1)(i))

Some resources may already be at their desired condition, while for others, desired conditions may only be achievable over a long period of time.

It is important to note that the phrase "Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined,..."

The following desired conditions for transportation systems has no clear specificity to measure any future progress toward achievements, except in the area of closing roads to restore ecological integrity. The first half of this desired condition (quoted below) is simply a statement of how minimalistic conditions currently exist and it never states that there is any goal to work toward a transportation system anything more than minimally sustainable.

I will direct your attention to page 78 which articulates the desired condition in the planning area Transportation System (TSTN).

Transportation System (TSTN)

See also all direction (and cross-references) in the Infrastructure section. Desired Conditions

FW-DC-TSTN-01: A minimum and efficient transportation system in the national forests is in place and maintained at least to the minimum standards appropriate for safe public access, for the protection of resources, and to support multiple uses that contribute to social and economic sustainability in the plan area. Conversely, road closures are effective in eliminating motor vehicle traffic, and road decommissioning is effective in eliminating motor vehicle traffic and restoring ecological integrity.

A critical reading of the desired conditions indicates that minimalistic travel/transportation conditions are present and minimally support multiple uses in the forest. It leads the reader to believe that the desired state is to not do any improvements, but to stay with the minimum efficient transportation system. It goes on to state a possible

status change as a desired future condition "...., road closures are effective in eliminating motor vehicle traffic, and road decommissioning is effective in eliminating motor vehicle traffic and restoring ecological integrity.

This is the only future alteration of conditions statement, makes the only prediction of what the future condition should be. It says that road closures and road decommissioning will eliminate motor vehicle traffic and improve the ecological conditions in the forests. That is the only statement of measurable "progress toward" an achievable condition.

In short, this statement says that the plan's only desired condition of the transportation system is to close roads to motor vehicle traffic to "restore ecological" conditions in the GMUG.

That is simply a road closure plan statement as a goal or desired conditions. The statement "...the plan area, toward which management of the land and resources should be directed", directs managers to close roads and to leave the minimalistic transportation system alone except for closures.

As a representative of an outdoor activity club that enjoy riding motorized vehicles on roads and trails in the backcountry, I am compelled to disagree with this as the single articulated goal for the transportation system. We are responsible citizens, many of us are senior-citizen retirees that can no longer hike at elevations. When were younger and more agile, we had no problems hiking many miles at or above 9,000 feet. Great walking distances and vertical changes were challenges we enjoyed taking. Now our advanced age, leg problems and general physical condition have severely limited our ability to be active in the forests we love. Therefore, we I have taken up ATVing and find this the only way we can refresh our souls in the great outdoors. This planning desired condition is simply a travel plan to eliminate motorized travel in the National Forests.

The 8th Chief of the Forest Service, Richard E. McArdle, said, "The National Forests are lands of many uses and many users". For several decades, this motto was displayed on almost every entry sign into our National Forests and it articulates the correct philosophy of the citizenry's many uses of the public lands. The mission statement derived from this motto, challenges the Forest Service to make sure they analyze the character of all geographic regions in the Forests from a fair-and-neutral view-point and not from a myopic view of a wilderness perspective. This road closures as a desired condition are nothing but a wilderness creation perspective.

Motorized users of the public lands respect the interests of all users, but we are aware that there are organized groups of non-motorized users who would like to restrict the access to our national backcountry to a limited membership of hikers and bicyclist. Motorized users do not want to eliminate anyone's access and use of public lands. Taking away large numbers of acres of motorized access from users appears to fair-use proponents as an unfair grab of public lands that are currently properly managed and regulated areas to create more wilderness land - indeed, without due process should not be a desired condition of the GMUG.

I received the email dated October 18, 2021 with the explanation of ROS allocations and data. I found the important quote on Page 2 of the attached PDF, "The forest plan will NOT close existing routes or areas."

Support for the GMUG Forest Plan Alternative

We support what is being referred as "Modified Alternative C" as the best path forward. This is the only alternative that complies with President Biden's EO 14008 to improve recreational access and goals of the USFS national and regional sustainable trails strategy.

With a growing population in the US, there needs to be more public land available for citizens to use. The Forest Service should not be attempting to manage the existing square miles of parks into exclusive use zones.

Outdoor recreation is becoming more necessary to the US public as indoor recreation becomes limited by such unexpected conditions like the pandemic. The Forest Service needs to accommodate more alternative forms of outdoor recreation instead of fewer. The end goal of the plan must be to create conditions that allow more citizens to enjoy the forests and not to restrict the public lands to a few single-focus patrons.

We ask that the GMUG work with the COHVCO and other responsible and inclusive public groups who have proposed the modifications to Alternative C.

