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GMUG National Forest

ATTN: Draft Forest Plan Team

Thank you for the opportunity to comment on the Draft Revised Land Management Plan Grand Mesa, Uncompahgre, and Gunnison National Forests

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 \$1.7 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 groups 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 Draft Forest Plan in trying to balance the diverse interests of the public, while protecting our natural resources. TMW welcome the opportunity to provide our assessment of needed guidance for future generations. 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.

Concern:

Please be advised that the TMW don't think Alternative A of the proposed plan accurately reflects or correctly addresses the current management on the GMUG. We have been involved in the NEPA process for years and those process are not reflected in Alternative A of the proposal. Without an accurate Alternative A, we are prohibited in our ability to compare the different alternatives. An accurate or updated Alternative A would allow us to avoid unintended consequences of the different proposed alternative on issues that were simply not analyzed correctly under Alternative A of the RMP. Alternative A fails to accurately reflect current management which precludes our ability to even address possible impacts from management proposed in the other alternatives. We are concerned that throughout the process accurately reflecting current management has been a problem. There appear to be a massive erosion of historical access that has occurred without NEPA, based on a highly subjective inventory of the forest in the RMP. This inventory is now presented as current management in Alt A despite all forest level travel efforts explicitly and clearly stating they are not changing current management decisions on the forest. We are unsure how changes of this scale have occurred. This is a management plan and should reflect management designations now and in the future. These designations are critically important to long term motorized access. It appears that there are many existing NEPA analyzed routes that are in areas of inconsistent management in the proposal. During the webinars it was discussed that these routes would be excluded from closures due to these conflicting designations with a corridor of consistent management. This is not reflected in any manner on maps or analysis. This must be clearly identified in the proposal, and we are unable to locate this in the document. Existing site specific NEPA must be recognized and carried forward.

Size of Document

To say the least, TMW was pleased and welcomed the generalized and shorter nature of the RMP when compared to other GMUG plans that were recently released that were 1000 pages long. These documents can be very long, and detailed and such length has proven to be a significant barrier to public participation in the planning process as many of the non-professional organizations lack the time or resources to review such a large planning document. Generally, in doing so the public tends to oppose the plan even if there are advantageous things in the plan for their organization. These overly complex and detailed plans also shorten the life and value of the plan as the plan simply lacks flexibility to adapt to changes in science or unforeseen challenges at the time of development. When these changes are encountered, the plan is simply irrelevant factually or recommending management that simply makes no sense in addressing on the ground issues.

While we support the shorter is better concept for the new plan, this desire should not be construed as a desire to avoid accurate analysis of the NEPA on the forest and the existing RMP and supplements. The creation of an

accurate summary of current management on the forest in Alternative A is a critically important step for the meaningful analysis of alternatives that are being proposed and this is a process that the USFS planners are uniquely situated to accurately address.

Specifically:

The Thunder Mountain Wheelers ATV organization {{TMW}} mostly supports Alternative C of the Proposal. It appears that it is the closest to an accurate reflection of the current management of the GMUG. We are adamantly opposed to Alternative D of the Proposal. As previously stated, Alternative A seems to be a mystery to us. It appears the mapping and information are in direct conflict with current management designation in many areas. In our review and analysis, we feel Alternative A is a failure in accurately reflecting many site specific NEPA analysis and decisions. Additionally, the TMW organization is very concerned with the GMUG effort that has not been addressed consistently or accurately and does not reflect the current management on the GMUG.

Collaboration:

The TMW ATV club has had a long history of collaboration and financial support with the Land Managers that far exceeds other organizations with forest interests. We have had a long history of collaboration with land managers to address issues and challenges on the GMUG and cooperated fully to come to conclusions via the NEPA process. Our organization has embraced this type of collaboration in the hope that issues can be permanently resolved, and managers and users can enjoy the recreational opportunities on the GMUG now and into the future. Too often we have had to remind our Forest Service partners about our collaboration's involvement and participation in the NEPA process before entering scoping and travel management discussions.

Another significant difference in our collaboration's efforts and NEPA participation is the fact we bring funding to implement decisions to the table. The motorized community has worked hard with the USFS, CPW and BLM to provide funding to address actual on the ground issues and currently this has resulted in a grant program for motorized recreation where our small organization has provided almost \$2 million in direct funding to land managers to benefit everyone across the GMUG. Motorized collaboratives have been hugely successful on addressing on the ground issues and challenges for the benefit of everyone on the GMUG and have become so effective in addressing issues that we feel sometimes we are easily overlooked.

Many collaboratives, who often create lists of demands and goals for the Forest Service do however provide little to no funding to implement such goals. We ask that our participation and long partnerships are weighted and recognized in the planning process. A reminder that the motorized community is the only community that brings significant resources to the GMUG to assist with management and maintenance of routes for the benefit of all users. The CPW OHV program is probably the largest trail partner with the GMUG, and this program is predominately funded from the voluntarily created OHV registration program. This significant direct funding probably makes the motorized trail network on the GMUG the most substantial forest in the State.

Maintaining, Increasing or Enhancing Access:

Supported by Alternative C

In review it appears that Alternative C is the only alternative that provides opportunity to increase or enhance recreational settings and opportunities currently and more importantly over the life of the plan. The enhancement of recreational opportunities on the GMUG will only occur with Alternative C. The significant population growth of the GMUG planning area, will not tolerate simply holding current levels of access because visitation from the motorized community will continue to increase.

Opposition to Alternative D:

As you can see outlined throughout these comments, the motorized community has worked hard to collaborate on a motorized issues over the life of the 1983 RMP. Under Alternative D, 77% of the forest would be restricted either as Wilderness or Roadless which would directly conflict with Presidential Executive Orders and National and Regional strategies that are mandated by Congress. Under this proposal, only 1% of the GMUG is managed for recreational use. Such impact is unacceptable to the motorized community and is not representative of visitations to the forest. Alternative D gives special treatment to management areas that are only for the benefit of a single interest group and its failure to improve recreational access to the public lands.

Wildlife Issues and Challenges:

There has been a lot of concerns raised about wildlife impacts from recreation on the forest. This fails to recognize that currently CPW has concluded elk populations on the GMUG are 35% above target populations and deer populations are only 10% below target which is attributed to winter kill issues from exceptional snowfall. This proves current management is highly effective at protecting wildlife on the GMUG. The TMW organization strongly believes it is important for planners to understand our support for wildlife management. [ldquo]Planning Trails with Wildlife in Mind[rldquo] has been the hallmark of TMW approach to current or newly proposed trails. We have worked hard to partner with the Forest Service to address wildlife concerns in travel management on the forest. We have been attentive to existing knowledge to understand clearly and completely what the true challenge is to the species and now it can be addressed. We ask that the best information and science on a wildlife issue be reviewed in the planning process and not automatically be implemented as closure issues. We have spent years of effort working with GMUG planners to address wildlife-based concerns in site specific and forest level planning under the never-ending assertion that populations are plummeting, and habitat is being overrun by motorized recreation. Alternative B would designate up to 740,000 acres of wildlife habitat on the Forest but fails to explain why these areas were designate. Based on commercially available information from CPW much of these areas are not habitat. Simply drawing these areas on a map does not make them habitat and there remains large tracts of habitat outside these areas available.

Travel Management Should Occur on a More Localized Level:

As a heavily involved motorized Organization we are aware that a certain amount of travel management will have to occur in the forest planning in the future and that this is unavoidable. We are also aware that nationally the BLM has moved AWAY from preparing Field Office level travel plans and decided that any travel management planning will be done on a more localized level as a matter of policy. This decision applies to all Field Offices regardless of where they are in the travel planning process. In our local area a neighboring field office has adopted this level of planning, and this has proven to be HIGHLY effective 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 for any result of the future planning process. This public support is a good thing and should be a higher priority in the new forest planning toolbox. While 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 our organization would strongly support moving to this level of travel management. Moving travel management planning to at least a Ranger District level would allow managers to address issues at the Ranger Districts level which would be more efficient and productive for that specific district which might have more travel management issues compared to other Districts graduating away from the one size fits all management process.

The Methodology of Route Density Calculations:

The TMW organization is very concerned that the process used for route density calculations in almost never discussed in the Proposals. It has been our experience that often one standard is originally applied in analysis and then there is erosion of the standard applied by those that are seeking to restrict an activity that occurs over the life of the present discussion. We are very concerned about such erosion as it can heavily impact any subsequent site-specific management decision making processes that may occur in the future life of the plan.

It has been our experience while participating in the various travel plans over the years that there are two general methodologies for the calculation of route density.

1.) One of which is based on an arbitrary grid for calculation being overlayed on the management area and then calculations are made for each square mile are then prepared and calculations remain based on the overlayed standard. Areas out of compliance in the grid are closed or restricted regardless of the fact the entire management area may be well within proposed standards.

2.) second standard is based on the total number of miles of routes in the management area is compared to the total number of square miles in the management area. Route densities are then based on the total management area, not a mile square grid overlayed on the management area.

For future planning purposes our organization suggests more flexibility be provided for the portions of the GMUG that are currently unrestricted. If we decipher it correctly the GMUG is restricted at around 50% and the Forest is Congressionally designated wilderness at 20% and another 30% of the forest is under some level of Roadless protection. Not Surprisingly only 1% of the GMUG is managed as a recreation emphasis area.

Alternative C of the Proposal would designate 891,000 acres of the forest under a single roadless area standard that does not correspond to designated roadless areas on the GMUG. This decision alone is going to create massive confusion of the public on what is being discussed. We are unsure how to manage to an inventory process that only addressed limited activities on the forest and again must question how these boundaries were drawn. The Colorado Roadless Rule created two inventory levels- Colorado Roadless areas and Upper Tier roadless area but all roadless areas in the GMUG proposal are managed under a single standard. We are unable to address our concerns with any more detail as we really are unable to address roads in the proposed areas.

We have been very involved in the development of the Colorado Roadless Rule and generally support the lower intensity recreation opportunities these areas provide. However, we are deeply opposed to the management of any area without significant discussion of why the area might be suitable for designation as huge tracts of the GMUG were found unsuitable for these designations when Colorado Roadless Rule was completed.

Many existing NEPA analyzed routes traverse areas of inconsistent management in the Proposal. Throughout meetings it was recognized that these routes would be excluded from closures due to these conflicting designations with a corridor of consistent management. This is not reflected in any manner on maps or analysis. This must be clearly identified in the Proposal, and we are unable to locate this in the Proposal. Existing site specific NEPA must be recognized and carried forward.

The flawed assumption that route density standards start from the incorrect position that routes and recreation are the only factors impacting habitat and wildlife populations. Alt B&D remove habitat effectiveness and provide 1 mile of trail per mile is proposed for significant portion of forest. There is no basis for standard or why the standard could not be 2 miles of trail per square mile. Upper tier roadless designations discussed 2 miles of trail per square mile and that was dropped due to huge negative impacts to recreation and the arbitrary nature of the standard.

Visitation Spikes

TMW strongly feels that there will be a significant increase and need for recreational access during the life of the RMP. During the COVID public lands rush, many areas saw an increase in visitation of about 30%, and in some areas near metropolitan areas an increase of 200-400% on average. The overwhelming portion of this usage was focused on the less restricted areas of the forest in general, which is significant as almost 50% of the GMUG is restricted either by Congressional designation or via a similar agency restriction such as a Colorado Roadless or Colorado Upper Tier Roadless type designation. Our organization don't think there is adequate planning scenarios incorporated in the plan to address the inevitable increase in motorized usage coming soon on the GMUG. As 2020 proved, our existing recreational resources are simply insufficient to deal with even moderate increases in visitation. We feel there needs to be more clarity in Alternative C.

Conclusion:

TMW organization mostly supports Alternative C and Adamantly opposed Alternative D. There simply needs to be more lands accessible for recreation on the GMUG to accommodate future demand. While Alternative C moves in that general direction it fails to provide needed access. We are not comfortable at all with the huge expansion of roadless areas under Alt C. There seems to be no guidance at all for what this management really looks like. Generally, we need flexibility in the plan and only C provides sufficient flexibility on all types of issues- fires, floods, landslides, and recreation.