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Comments: See attached comment.

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Comment Regarding the GMUG Forest Plan

Update

Marcus Trusty

President, Colorado Offroad Enterprise (CORE) November 24, 2021

## I. Introduction

I am an offroad enthusiast from Buena Vista, Colorado. I am the founder and president of Colorado Offroad Enterprise (CORE). CORE was created to partner with land managers to engage in trail adoption, trail work, stewardship, and offroad ethics. We have 15 adopted trails in Central Colorado. Two of our adopted trails are in the Gunnison National Forest. We have spent several thousand volunteer hours working on roads in the Gunnison National Forest over the past three years to provide ongoing maintenance and remove environmental hazards.

Additionally, work closely with BLM and The Forest Service in Colorado to keep our prized offroad and backcountry roads and trails open for the continued enjoyment of multi-use backcountry recreation. I have personally been visiting the National Forest Managed Lands in the GMUG for over 40 years.

These comments are submitted on behalf of myself, CORE, and our 200 members from around the country who regularly visit the GMUG. We present these comments to request that the GMUG Forest Plan Update be corrected in many areas to preserve the existing ROS for motorized use and expand those ROS zones to maximize the opportunities for motorized recreation.

This Draft Forest Plan Draft Update seems to contain some short-sighted issues from a planning standpoint and is riddled with mapping errors. None of the Alternatives are correct for the current management of motorized routes. None of the alternatives accurately reflect the existing semi-primitive motorized (SPM) ROS zones and the motorized roads and trails open to public use within those zones. Alternative B has many routes cherry

stemmed as SPM ROS zones without planning to add future connecting routes. The Forest Plan Update Process should consider the need to rebuild existing routes in an entirely new location or re-route sections of existing routes. The GMUG landscape frequently changes due to environmental events, including avalanches, windstorms, rockslides, landslides, and could see a significant forest fire at some point.

All these events have devastating consequences on existing roads and motorized trails. If the Semi-Primitive Motorized ROS zones are not restored to those depicted in the 1983 GMUG Forest Plan, many motorized routes could be lost during these future landscape events. Additionally, the changes in private property ownership for small parcels located in the GMUG in and around roads are not being discussed within this planning process. Property owners sometimes gate roads, and public access is restricted as a result. Suppose the GMUG no longer has ROS zones for semi-primitive motorized recreation. In that case, the GMUG has no options in the future to address these potential problems and disputes over access across private property. CORE believes these specifics were the intent behind the ROS zone designation initially, and strong consideration should be given to maintaining the full scope and size of SPM ROS zones.

If The Forest Plan does not recognize the dynamic and changing landscape when planning, the planners are doing a disservice to the public and the motorized community. Additionally, we also support the comments and recommendations made by the Trails Perseveration Alliance, Colorado Off-Highway Vehicle Coalition, Blue Ribbon Coalition, Colorado Offroad Trail Defenders, and the Colorado Snowmobile Association.

## II. General Comments

A. There are substantial mapping errors in all the Alternatives. These errors should be corrected immediately to allow Forest Planners and the public to understand how each Alternative compares to active management. Many Semi Primitive Non-Motorized ROS zones are overlaid onto existing motorized routes. Also, by only cherry stemming some motorized routes and placing semi-primitive non- motorized zones around those routes, the following percentage comparison data is highly confusing and is not comparable to active management.

B. Inventoried Roadless Areas (IRAs) should not preclude the development of future trails and should not hamper the management of existing trails within the IRAs. Motorized trails are compatible and acceptable for IRAs, and The Forest should not be leveraged into managing these trails with hostile motorized intent.

C. A range of alternatives is presented as part of any Forest Service Project to weigh different options and contrast various perspectives before making a final decision. Why is there no Alternative offered as a "Recreation Alternative," which would allow for an increase in recreation above current management? Alternative C is the closest (still with errors) Alternative to active management. This Alternative shows a percentage of 52% motorized. Both B and D have a substantial reduction in motorized opportunities. Alternative B and D both land in

the low 40s in terms of a motorized percentage. Without analyzing an alternative that would increase motorized use beyond current management, the process automatically dictates some level of motorized reduction. This does not allow for objectivity and does not account for the increase in recreation since the last Forest Plan in 1983. There has been a quantifiable and substantial increase in recreation during the previous 38 years. Why is there not an alternative reflecting the option to increase all forms of recreation?

D. The GMUG should adopt language as part of this Forest Plan Update to recognize any motorized route, which has already been designated as part of a travel management decision. There are numerous errors within every Alternative, which place a non-motorized zone over a motorized route. It's challenging to account for every inch of each ROS zone containing mistakes. Due to this fact, and because the GMUG planning teams clarified intent to not overlay any existing motorized route with a non-motorized zone, protections for these motorized routes should be included in the Forest Plan Language. None of us want to have to go back and revisit a conflict at some later date because a route error slipped through the cracks and caused a conflict with a ROS zone.

E. The term "User Conflict" (social values conflict) shows up in some aspects of the draft plan. This term is highly vague and does not stand up to scrutiny like a "Use Conflict" does. A "Use Conflict" (interpersonal conflict) is the specific on-ground circumstance where two specific uses are incompatible. An example could be a desirable mountain bike singletrack trail also used by hikers. There could be a specific use conflict if bikers descend at high speed around blind corners while hikers are ascending.

By contrast, a "User Conflict" is not defined and is primarily based on users' emotions. This vague idea should not preclude one user over another in this updated Forest Plan. Assuming that users are incompatible across the board and that people simply can't recreate together is not substantiated by the on-ground recreation interactions, which take place daily. Users from all over the county somehow travel to the GMUG for recreation and can get there via numerous modes of travel. They come from all different backgrounds, yet when they are on the ground recreating in The Forest, they somehow no longer can be around others? This, of course, is nonsense and should not be a justifiable way of taking from one recreational group and giving to another.

During our volunteer hours, CORE has had hundreds of first-hand accounts interacting with diverse users within the GMUG. We have never once had a conflict with another user. In contrast, we have helped other users. We have given directions, rescued lost dogs, given food and water, and answered questions. All recreational users can recreate in harmony together without an interpersonal conflict if allowed to do so. GMUG Planners should only evaluate a "Use Conflict" if quantifiable evidence exists on the ground to investigate such an issue.

F. Forest Employees mentioned phrases such as 'these are places nobody goes' and 'roads in this area don't go anywhere' during public interactions, online meetings, and discussions regarding ROS zones. CORE does not expect Forest Employees to know where and how each recreator uses the GMUG, nor is it prudent for each employee to see the use and value of every motorized route within the GMUG. The GMUG is a vast area; visitors engage in numerous forms of recreation. Recreation uses change and flow with pop culture and trends; there is simply no way of knowing what visitors are doing at each moment within the GMUG.

It is also true that Forest Employees should acknowledge visitors are using their public lands and not speculate or prejudice the process by making simplistic assumptions. Every road and motorized route within the GMUG have value. The public uses each motorized road and trail. People do visit the remote areas of the GMUG, and there can be no way Forest Employees know how, when, where, or for what purpose each of these visits takes place. GMUG planners should review all the data and info objectively before making decisions. Assuming roads have no value or that people never visit a specific area of the GMUG only serves to undermine objectivity.

### III. Continental Divide Trail

Motorized use of Continental Divide Trail and surrounding area should be maintained in the Forest Plan Update. Language from Alternative B should be included in the Preferred Alternative to keep the status quo, allowing motorized access to the Continental Divide Trail. It's also crucial to remember; the Continental Divide Trail used existing motorized routes as part of the trail when it was designated. This should not preclude existing or future motorized use from those sections of the Continental Divide Trail.

### IV. 1983 Plan ROS Zones

The GMUG Forest Planning Team has been asked several questions about why the 1983 ROS zones do not match up with the Active Management Map. For example, large areas of semi-primitive motorized recreation ROS Zones exist on the 1983 map. Yet, motorized routes in many cases are cherry stemmed in non-motorized ROS zones in many of the Alternatives. The GMUG Planning Team responded with this explanation:

"1983 forest plan direction for Recreation Opportunity Spectrum (ROS) settings included specific prescriptions for approximately 40% of the forest. The non-specific prescription of "Rural [ndash] Rooded Natural [ndash] Semi Primitive Non-Motorized" covered approximately 60% of the forest and included the categories of Rural, Rooded Natural, Semi Primitive Motorized, and Semi Primitive Non-Motorized, applied anywhere within a given Management Area. There is no internal agreement as to what these non-specific prescriptions meant for an area nor how to implement it to maintain recreation settings over time."

This statement does not adequately answer the questions as to why the ROS zones were changed before the Forest Plan was updated. Management Designations are management designations. How can the GMUG team claim these designations are non-specific prescriptions when a specific category and zone (blue) is in the 1983 plan titled "No ROS Prescription"? Therefore, if there is a zone with no ROS prescription, the zones with a stated use are prescriptive. I have not been successful in locating a .pdf of the original paper 1983 Forest Plan Map. However, it would most likely resemble a neighboring forest (The Pike and San Isabel), which had a Forest Plan developed one year later in 1984. The original PSI paper map is available in .pdf and has a legend describing the zones and their intent. A 2A Semi Primitive Motorized Zone has this description:

"Management emphasis is for semi-primitive motorized recreation opportunities, such as snowmobiling, four-wheel driving, and motorcycling, both on and off roads and trails. Range resource management provides sustained forage yield."

How could a 1984 Forest Plan from an adjacent forest have an overview detailing how to manage a semi-primitive motorized zone, but the GMUG has nothing? "[hellip] on and off roads and trails." can be assumed to include hunting and camping with motorized vehicles engaged in a roadside activity.

To clarify my point suggesting the GMUG is dodging the question, suppose I propose a new motorized trail to the GMUG; what would happen if I proposed that motorized trail within a semi-primitive non-motorized ROS zone? Would the GMUG entertain my request because "[hellip]there is no internal agreement as to what these non-specific prescriptions meant for an area[hellip]? I'm guessing the GMUG's response to my proposal would be the opposite and state the location I chose was in a semi-primitive non-motorized zone, so my motorized trail proposal would not be considered. That answer would be correct and would be in line with the PRESCRIPTIVE intent of the ROS zone.

By that same example, semi-primitive motorized zones should NOT be removed or made smaller with the justification of there being no internal agreement. A semi-primitive motorized ROS zone was chosen to be drawn around roads and motorized trails grouped together or around those in a general region. This would not preclude other recreational opportunities but does acknowledge the recreational aspects of the AREA and not simply the road or trail in a small corridor.

Roads and trails many times need re-routed entirely or for a small section. If that road/trail is in a semi-primitive motorized ROS zone, the project is much easier. Also, new trails and connectors making for a looping trail are allowable in a semi-primitive motorized ROS zone. Still, if everything outside of an existing road/trail corridor is now a non-motorized zone, this makes any new development impossible.

Taking a "snapshot" view of how the GMUG looks today and planning via corridors does not allow for flexibility in the future. Planning implies things will not always stay the same. The GMUG planning team is setting the motorized community up to lose recreational assets if environmental events change the landscape and alter the path of a road/trail. Additionally, suppose a road/trail is deemed "unsustainable" in a future travel management project and decommissioned. In that case, we cannot develop a new, replacement road/trail if a semi-primitive motorized ROS zone is not maintained.

V. Alternative B.

Alternative B has some errors with non-motorized ROS zones overlayed with existing motorized routes. Still, our biggest concern is that the ROS zones for motorized routes are mainly non-existent. The GMUG planning team chose to place motorized zones around existing routes in a cherry stem manner, establishing non-motorized or other zones outside these motorized buffers.

After attending meetings and questioning The Forest Planning Team, it appears the goal was to acknowledge all existing motorized routes but not to admit (in many cases) they were in motorized zones. However, there are extensive errors in which motorized routes have had a non- motorized zone overlaid on top of the route. This would make for incompatibility with existing management. Again, the Planning Team has quite clearly stated this to be an error as they "did not intend to include motorized routes in non-motorized zones," a direct quote from the virtual GMUG public open house on October 16.

Due to the extensive errors of motorized routes and incompatible ROS zones across all the alternatives, we will not detail each of these errors for all the alternatives. We are recommending Alternative C., with modifications, and will focus on the summary of corrections required in that section of our comment below. We understand Alternative B might be the unofficial "Preferred Alternative" by The Agency. However, we do not believe Alternative B presents a viable option for current and future management.

#### VI. Alternative C.

Alternative C captures the best option (with errors) for active management. This allows for many ROS zones to be maintained and motorized recreation planning and management to occur in the future. Because the GMUG planning team clarified their intent not to overlay a current motorized route with a non-motorized zone, this would create an incompatibility. The errors in Alternative C need correcting.

We recommend Alternative C for several reasons: the importance of maintaining the existing ROS zones for semi-primitive motorized recreation. These zones keep existing motorized roads and trails intact and allow future area management in expansion, re-routes, or route replacement. A great example of this can be found between the towns of Whitepine and Pitkin. From the below picture, Alternative C places the entire area in the light brown Semi-Primitive Motorized Zone (SPM) zone, similar to the 1983 Forest Plan Map.

[EXCERPTED MAP: ALTERNATIVE C, WHITEPINE/PITKIN AREA]

It is imperative to keep these motorized ROS zones intact to manage for the future. We have adopted Tomichi Pass (888), Hancock Pass (266), Alpine Tunnel (544), and help with Williams Pass (298). The area has experienced environmental events rendering some of these routes closed for extended periods in the past. We have done work on Tomichi Pass (888), Williams Pass (298), and Alpine Tunnel Road (544) to reopen the routes for public use. GMUG Planners cannot predict future environmental events and which motorized route challenges will be present in the future. If these routes are simply cherry stemmed as in Alternative B, there is not much margin for error. See the corresponding photo below depicting Alternative B for the same area.

[EXCERPTED MAP: ALTERNATIVE B, WHITEPINE/PITKIN AREA]

If an environmental event destroys a route or section, it would be nearly impossible to re-route or build an entirely new route if existing motorized zones are relegated to corridors. A re-route for Tomichi Pass (888) has been discussed as a long-term solution to bypass the rockslide area that we have worked on for the last three years to keep the pass open.

Another important example in this area GMUG Planners need to consider is the issue facing NFSR 890 just south of Whitepine. NFSR 890 once connected the Whitepine area with the Old Monarch Pass Route (237). Several years ago, Gunnison County claimed right-of-way on 890, keeping it open to public use, but then abandoned their claim turning the management of 890 over to property owners along the route. One property owner has since gated the road. This removed public access and severed connectivity to 237.

[EXCERPTED MAP: NFSR 890 IN ALTERNATIVE B]

One option is to re-route 890 or to build a new trail connecting Whitepine to 237. If a motorized ROS zone is not maintained in this area, and on both sides of 890, there will be no possibility to explore a solution to this problem. The screenshot above shows NFSR 890 above in Alternative B. The 1983 2A SPM zone has been shrunk down, and now a SPNM zone occupies everything east of NFSR 890. On the flip side, Alternative C is the best option because it would keep most all the SPM zone fully intact for this area.

The NFSR 890 issue should serve as an example to the GMUG Forest Planners concerning future private property issues. Private Property parcels are scattered within GMUG managed lands. Many times, these parcels are located along or across motorized routes. Private Property issues will only become more magnified in the future. If motorized ROS zones are not maintained like those in the 1983 Forest Plan, the GMUG will have few options in dealing with gated roads or access disputes in corridors. If a zone is maintained, route re-alignment can be considered, and an entirely new route could be considered. These specific situations highlight the need to closely rework the SPM ROS zone to resemble those on the 1983 Forest Plan Map.

Routes and ROS zones in need of correction are as follows by District and Area:

Gunnison Ranger District

Pitkin Area

The Recreation Opportunity Spectrum (ROS) encompassing the following Route(s) is requested to be changed from Semi Primitive Non-Motorized (SPNM) to Semi Primitive Motorized (SPM) ROS.

\* Routes # 9478 (Fossil Ridge), 9549 (Cameron Gulch), 9427 (Gold Creek), and 9426 (Fairview).

\* The end of both Routes # 7765.2B (Blistered Horn) & 7765.2C (West Willow)

Sargents Area

The ROS area surrounded by the following Route(s) is requested to be changed SPNM to SPM ROS

\* Route #'s #'s 9487 (Razor Creek) & 9485 (Lefthand).

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS.

[sect] Route # 9538 (Dawson Creek)

[sect] Route #'s #'s 7806 (Beaver Creek) & 7807 (Rock Creek)

The following Route(s) have segments or spurs with SPNM that are requested to be changed to SPM.

[sect] Routes # 7854 and 1 spur 7854.2L (Homestead & Homestead Spurs)

[sect] Routes #7801, 7801.1A & 7801.A1 (Tomichi Dome & Tomichi Dome Spurs)

The ROS Roded Natural (RN) surrounding the following Route(s) is requested to be expanded to allow for unforeseen future circumstances (fires, floods, landslides, etc.) that would require alterations to the existing alignment on the following

[sect] Route #7794 (Cochetopa Creek)

The following Route(s) have mapping errors. Many of which are motorized segments of the Continental Divide National Scenic Trail and Colorado Trail.

[sect] Route #9531 (Monarch Ridge/Monarch Crest) is a motorized trail listed as a non-motorized trail on both sides of HWY 50 surrounding the Monarch Pass Summit in all Alternatives and needs to be corrected.



[sect] Route #9484 (Agate Creek) is motorized West of #9531 (Monarch Ridge/Crest). A small section is shown as non- motorized in all Alternatives and needs to be corrected.

[sect] Route #7243.3H/9486 (Windy Peak/Summit Trail) has an Administration "motorized restricted use" trail designation and should be converted to a motorized trail.

[sect] Route #9499 (Pine Creek) is a motorized trail from CO HWY 114 to NN14 (Cochetopa Pass). Map designations of non-motorized and Administration "motorized restricted use" should be converted to motorized trail.

[sect] Route # 9625 (Milk Creek) needs access restored around private land

#### Lake City Area

The ROS Roded Natural (RN) surrounding the following Route(s) is requested to be expanded to allow for unforeseen future circumstances (fires, floods, landslides, etc.) that would require alterations to the existing alignment on the following

[sect] Route # 7788 (Cebolla Creek)

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS.

\* Route #7568 (Wager Gulch)

\* Route #9248 (Wager Gulch Memorial Trail)

\* Routes # 870(N. Henson Creek) & 870.2A (Matterhorn Creek)

#### Crested Butte/Taylor Park

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS.

[sect] Route # 9561 (Eyre Basin)

[sect] Route #9413 (Matchless) to Taylor Reservoir

[sect] Routes #9424 & 9424.1A (Dr. Park) from Route #7554 to Route #742.1A

[sect] Route # 7585 & 9585(Gunsight Pass)

[sect] Route # 7826.1D (Green Lake)

[sect] Route # 9436 (Carbon)

[sect] Route # 7563 (Carbon - Red Mountain) & Spurs # 7563.1A & 7563.2A

The following Route(s) have segments with ROS SPNM that are requested to be changed to SPM

[sect] Route # 9423 (Rosebud)

[sect] Route # 9554 (Teocali Mountain)

[sect] Route # 7742.1T (South Lotus)

[sect] Route # 7955.1E (Flat Top Bench)

[sect] Route # 9378 (Brush Creek Jeep/Pearl Pass)

[sect] Routes # 7761 (Taylor Pass) & 7761.1A (Taylor Pass Divide)

The ROS SPM surrounding the following Route(s) is requested to be expanded to allow for unforeseen future circumstances (fires, floods, landslides, etc.) that would require alterations to the existing alignment on the following

[sect] Route # 9414 (Timberline) North of Route # 7209 (Cottonwood Pass)

The ROS Roded Natural (RN) surrounding the following Route(s) is requested to be expanded to allow for unforeseen future circumstances (fires, floods, landslides, etc.) that would require alterations to the existing alignment on the following

[sect] Route # 7584 (Tellurium) & 7584.1C (Pine Creek)

[sect] Route # 9631 (Lotus Creek)

[sect] Route #7752 (Poverty Gulch)

The following Route(s) have mapping errors

[sect] FT #'s 9561 (Eyre Basin), 9413 (Matchless) to Taylor Reservoir are listed as open motorized routes in all Alternatives. However, these FT were closed in previous TMP and are not recognized on the Gunnison Ranger Districts' current inventory as motorized or non-motorized use trails.

Gunnison/Blue Mesa

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS.

[sect] Routes # 7859 & 7637 (Sun Creek), # 7574 (Black Gulch)

[sect] Routes # 7609.A2 & 7609.A3 (Bear Springs Spurs)

[sect] Routes # 7721 (Soap Creek), #7721.3F (Big Soap)

#### Norwood/Ouray Ranger District Ridgway/Ouray Area

The following Routes have segments with ROS SPNM that are requested to be changed to SPM

[sect] Route # 861.1 (Middle Fork Cimarron)

[sect] Route # 860 (West Cimarron)

[sect] Route # 857 (Cow Creek)

[sect] Route # 870 (N. Fork Henson) & # 8702.A (Matterhorn Creek)

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS.

[sect] Routes #878 (Engineer Pass), 876 (Poughkeepsie Gulch) & 873 (Silver Link Mine)

[sect] 886 (Corkscrew Gulch), 887(Gray Gulch) & 884 (Brown Mountain)

Seasonal Closures on the following Route(s) limiting motorized recreation from July 1 to September 1 (60 days) are too limited and are requested to be extended.

[sect] Route # 6221 (Nate Creek)

The following Route(s) in the Ridgway/Ouray area have mapping errors

[sect] #6221 (Nate Creek) is a motorized trail listed as non-motorized in all Alternatives and needs to be corrected.

#### Telluride Area

The ROS encompassing the following route(s) is requested to be changed from SPNM to SPM ROS.

[sect] Route # 630 (Ophir Pass)

[sect] Route # 648 (Black Bear Pass)

[sect] Route # 869 (Imogene Pass)

[sect] Route # 5421 (Wilson Mesa)

[sect] Route # 853.1B (Yankee Boy Basin)

[sect] Route # 853.1C (Governor Basin)

[sect] Route # 853.1C1 (Sydney Basin)

[sect] Route # 850 (West Dallas)

[sect] Routes # 869.1A & 6233 (Richmond Basin)

#### Uncompahgre South

Seasonal Closures on the following Route(s) limiting motorized recreation from July 1 to September 1 (60 days) are too limited and are requested to be extended.

[sect] Routes # 5118 (Red Canyon), 5541 (Powerline), 6131(Hornet Creek), 6126 (Paradox), 6149 (Buck Creek), 5516 (Clear Creek) & 5421(Wilson Mesa)

CORE would also like to support Motorized Multi-Use Trail Development in the Norwood Ranger District. Specifically, Busted Arm Draw and Beaver Park areas as proposed by the Norwood Parks and Recreation District

#### Grand Valley Ranger District

#### Uncompahgre North Area

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS

[sect] Route # 600 (47 Road)

[sect] Routes #2632 (Franks Bench), #2634 (Bunch Ground) & 2620 (Blue Creek)

Seasonal Closures on the following Route(s) limiting motorized recreation from July 1 to September 1 (60 days)

are too limited and are requested to be extended.

[sect] Routes # 2621(Long Canyon), 2627(Beaver Dam)

#### Grand Mesa Area

ROS SPM surrounding the following Route(s) is requested to be expanded to allow for unforeseen future circumstances (fires, floods, landslides, etc.) that would require alterations to the existing alignment on the following

[sect] Route # 2719 (East Green Mountain)

#### Paonia Ranger District

#### Grand Mesa East Area

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS for future trail development

[sect] Routes # 8810 (Clearfork),8812 (Jones Creek), 8814 (Gooseberry), 8815 (Drift Creek)

#### Paonia Area

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS for future trail development

[sect] Route # 8820 (Raggeds)

[sect] Route # 8842 (Beckwith Pass) to 8840 (Cliff Creek)

[sect] Route # 8848 (Three Lakes)

[sect] Route # 8838 (Dyke)

[sect] Route # 720 (Curecanti Creek)

[sect] Route #8872 (Trail Creek)

[sect] Route #8888 (Dyer Creek)

[sect] Route #8884 (Mendicant Ridge)

[sect] Route #8880 (Piburn)

[sect] Route #8881 (Castle Rock)

[sect] Route #814 (Virginia Creek)

[sect] Route #8864 (Throughline Jeep)

[sect] Route #8883 (Coal Creek)

[sect] Route #835 (Little Coal Creek)

[sect] Route # 8890 (Inner Ocean Pass)

[sect] Route # 8894 (Lamborn)

[sect] Route # 8891 (Todd Reservoir)

[sect] Route # 8897 (Lands End)

[sect] Route # 832.2A (McDonald Mesa Spur A)

[sect] Route #834.2A (City Springs Spur A)

[sect] Route # 834 (City Springs)

The ROS encompassing the following Route(s) is requested to be changed from SPNM to SPM ROS

[sect] Routes # 913 (Shaefer) & Spurs 913.1A and 913.1B

The ROS area surrounded by the following Route(s) is requested to be changed SPNM to SPM ROS

[sect] Routes # 8711 (Raven Mesa) and spurs 8711.W & 8711.V1

[sect] Routes # 711 (Dry Fork MN Creek), 711.3C (The Pines) 711.3B/8721(East Flatiron) 8721 (West Flatiron)  
8720.1A (Rav 1 Spur) 8871 (Long Draw Saddle)

The following Route(s) have segments with ROS SPNM that are requested to be changed to SPM

[sect] Routes # 711.3A (Sunset), 711.2D (Ditch Cabin), 8723 (Elijah's Park)

VII. Alternative D.

Alternative D, primarily based on the Gunnison Public Lands Initiative (GPLI), should be removed from further detailed study. Alternative D has by far the most inaccuracies of all the Alternatives. Alternative D erroneously places portions of Taylor Pass, Cottonwood Pass, Monarch Pass, Hancock Pass, Pearl Pass, Williams Pass, Tomichi Pass, Marshall Pass, Schofield Pass, Black Bear Pass, Engineer Pass, Ophir Pass, and Imogene Pass ALL in non-motorized ROS zones or SMAs. These are merely a few examples; Alternative D has hundreds of motorized routes in non- motorized zones. First, it's inconceivable how this could happen. And second, the Gunnison County Commissioners and others in support of GPLI feel that Alternative D does not restrict motorized access enough. With the known errors stated above, placing major highways in non- motorized ROS zones is absurd.

The GPLI SMA's proposed in Alternative D also contain 34 existing motorized routes within their boundaries. These routes in SMAs are as follows:

Beckwiths SMA [ndash] NFSR 830, NFSR 830.1A, NFSR 830.1B, NFSR 778, NFSR 913, NFSR 913.1B, NFSR 822, NFSR 776, and NFSR 12.5H.

Horse Ranch Park SMA [ndash] NFSR 12.1F

Flat Top SMA [ndash] NFSR 7563, NFSR 7829, NFSR 7955, NFSR 7955.1E, NFSR 7829.1A, NFST 9863, NFST 9863.2A, NFST 9863.E, NFSR 7862, NFSR 7860.1C, NFSR 7860.1A, and NFSR 7820.

Rocky Mountain Biological Research SMA [ndash] NFSR 7317, NFSR 7317.3E, NFSR 7569, NFSR 7317.3C, NFSR 7317.3H, NFSR 7317.3G, NFSR 7317.3B, NFSR 7317.3A, and NFSR 7956.

Poverty Gulch North SMA [ndash] NFSR 7552

Granite Basin SMA [ndash] NFST 9553

Lone Cone SMA [ndash] NFSR 612.1B

It's extremely clear from these issues that the GPLI simply never checked their work against the existing MVUM maps, county road maps, or highway maps. This, in the face of the GPLI, continues to assert that no motorized roads and trails will be closed through the GPLI proposal. And, as bad as alternative D is, those responsible for pushing the GPLI are now asking the GMUG to restrict motorized access even further than Alternative D with all the errors mentioned above!

We should also note that for these reasons, CORE, along with other motorized organizations, has not and does not support the GPLI. The GMUG should also be wary of a county organization with select input from Gunnison County, proposing wholesale recreational use changes to public lands owned by every American Citizen. While some of the GMUG does indeed fall within the boundary of Gunnison County, public lands are for everyone to enjoy, and strict management or recreation restrictions should not be based on the political opinions of a few individuals representing a single county.

#### 1. Summary

CORE recommends Alternative C with corrected SPNM ROS zone errors where they overlay existing motorized routes. We recommend that the GMUG Planners adjust Alternative C to add back SPM ROS zones in critical areas to allow continued, expanded, and modified future motorized use. SPM ROS zones are essential to ongoing forest management, and we feel they were primarily captured correctly in the 1983 Forest Plan.

Thank you for your consideration.

Marcus Trusty

President, Colorado Offroad Enterprise (CORE)