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Comments: These comments are solely WildEarth Guardians'.

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November 26, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests Attn: Plan Revision Team

2250 Highway 50

Delta, CO 81416

Submitted via Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision Portal at:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=51806>

Dear GMUG Planning Team,

Please accept the following brief comment on the GMUG's Draft Plan and Draft Environmental Impact Statement on behalf of WildEarth Guardians. This comment is solely WildEarth Guardians'. We are separately submitting joint comments with High Country Conservation Advocates, Defenders of Wildlife, and other conservation organizations on the GMUG's Draft Plan and Draft Environmental Impact Statement.

We write separately here to make the following recommendation: The revised land management plan must contain standards for both the Transportation System and Recreation ecosystem services that state: "Over-the-snow motorized vehicle use is prohibited off the designated system."

We make this recommendation because the GMUG's three travel management plans are not in compliance with subpart C of the Forest Service's travel management regulations at 36

C.F.R. part 212. Under subpart C, each national forest with adequate snowfall must designate and display on an "over-snow vehicle use map" a system of routes and areas where over-snow vehicle (OSV) use is

permitted based on protection of resources and other recreational uses. 36 C.F.R. [sect] 212.81. OSV use outside the designated system is prohibited. Id. [sect] 261.14.

The GMUG, however, has allocated vast areas as open to cross-country OSV travel largely by default. For example, the Record of Decision for the Uncompahgre Travel Plan falls short making area-wide, or route-specific decisions specifying type/category of winter travel across the entire Forest. See 2002 Uncompahgre National Forest Travel Plan Record of Decision at 9 ([ldquo]Winter Travel Decisions: In addition to the decisions above, which relate to the entire UNF, it is also my Decision to restrict motorized use on selected areas in winter. This focuses on over-the-snow travel by motorized means. My Decision is to restrict travel to designated routes through the areas indicated in the Winter Decision Map attached to this ROD. I have stopped short of making area-wide, or route-specific decisions specifying type/category of use for the remainder of the Forest..) (emphasis added). The 2010 Gunnison Winter Travel Management Plan is also not in compliance with subpart C, as the Forest Service neglected to designate OSV open areas and routes and close all areas of the Forest that weren[rsquo]t designated as open on portions of the Forest. See DEIS at 19-20 ([ldquo]Where there is no established travel management plan, such as a winter travel management plan in portions of the Gunnison Basin, outside of wilderness the settings would be driven largely by snow conditions and recreationists[rsquo] access and ability.[rdquo]).

Subpart C rejects this default [ldquo]open unless designated closed[rdquo] approach, and instead requires the Forest Service to [ldquo]designate[rdquo] specific areas and trails for OSV use (consistent with the minimization criteria), and prohibits OSV use outside of the designated system. See 36 C.F.R. [sect][sect] 212.80(a), 212.81(a), 261.14. In other words, subpart C requires forests to make OSV designations under a consistent [ldquo]closed unless designated open[rdquo] approach. It is past time that winter travel planning for the GMUG come into compliance with subpart C.

To do so the Forest Service must, across the entire GMUG planning area, designate as open only those discrete, delineated areas that are appropriate for cross-country OSV use and minimize environmental damage and conflicts with other recreational. Similarly, the Forest Service must locate any designated routes or trails to minimize resource damage and conflicts with other recreational uses. OSV use outside these areas and off these trails must, by regulation, be prohibited. Hence, we strongly recommend that the revised management plan includes one or more standards that declare that over-the-snow motorized vehicle use is prohibited outside designated areas and trails.

We sincerely appreciate all the hard work that GMUG National Forest staff have invested in the plan revision process to date. We look forward to working with you to fix the draft plan[rsquo]s shortcomings in order to construct a final revised plan that safeguards the GMUG for future generations. Thank you for considering this comment. Please contact us if you have any questions.

Sincerely,

Chris Krupp, Public Lands Attorney WildEarth Guardians

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