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Title:

Comments: GMUG National Forest

Att: Forest Plan Revision

2250 South Main Street

Delta, CO 81416

Re: Draft GMUG RMP

Dear Sirs:

I am providing the following comments on your draft Forest Plan (FP) and draft EIS of the Grand Mesa, Uncompahgre and Gunnison (GMUG). As background, I was one of the founding members of the Colorado Off Highway Vehicle Coalition (COHVCO) in 1987, have held most of the officer positions at COHVCO at various times over the years, am a current board member of the Colorado Trails Preservation Alliance (TPA), and have been an inholder in the Gunnison Ranger District for over 30 years. I own and am preserving one of the most complete circa 1900 mining complexes in the state. I was also one of the principle authors of the TPA's comments on the 2010 Travel Management Plan (TMP) for the Gunnison. So the GMUG is important to me both personally and professionally (well, non-profit professionally).

While a board member of the TPA, these comments are my own, and should not be taken for those of the TPA. I agree with the vast majority of the comments submitted by the TPA

Draft Forest Plan Document

When I started reviewing the FP, your first graphic caught my eye:

[IMAGE: DIAGRAM OF FOREST PLAN RELATIONSHIP TO PROJECT ACTIVITIES]

While a simplified graphic, it should provide some insights. But it apparently takes all recreation and lumps it into "Trail Decisions". While the remainder of the document gets into lots of detail, I think this is a glaring oversight, and sets the tone for the document not being ready for prime time. And we know that

15+ years is unreasonable, as proven by all R2 forest plans being 30-40 years old now.

The USFS seeks public input, but then the document makes understanding the Alternatives next to impossible. I offer Figures 3-6 as an example. These pie charts all have different elements, such that a person can't tell what goes into a CO Roadless Area, or General Forest for example, and the changes by Alternatives. These pie charts simply confuse a complicated subject.

[FIGURE: PIE CHARTS OF MANAGEMENT AREAS FROM DEIS CHAPTER 2]

Then we go to [Idquo]Geographic Areas[rddquo], that don't tie back to each of the GMUG Forest boundaries, but create different, ill-defined areas, which act to confuse, rather than assist the reviewer. Further, Tables 5-24 are inconsistent, as Alternative A is left out of several, making it unclear what the proposed changes would be under each Alternative. This needs to be clarified.

In addition to being inconsistent with the Forest boundaries and Alternatives, these tables don't take into account the odd shapes and discontinuous nature of the various prescriptions. A cherry stem of Primitive Motorized around an existing route provides some acreage in that category, but because the Primitive Motorized is often times surrounded by Non-Motorized Primitive (or other) it does not provide for adequate future management by the USFS to meet either agency needs, or those of the public. By slicing and dicing into very small elements, you have essentially eliminated the ability of the USFS to change modify and certainly not increase, existing routes. As an example, the 2005 Travel Management Rule requires the forest to review travel plans and update them. This includes providing for additional trails, roads, and connectors, as needed.

The tabular nature by acreage implies that each prescriptive element offers opportunity for enhancements. But the piecemeal nature of the prescriptive maps looks like an abstract painting by a 4 year old with only 5 colors in the palette, and no ability to mix colors. Without larger zones by various prescriptions, there is virtually no future management opportunity.

#### Recreational Use

As presented, the FP is likely to be challenged as pre-decisional on future Travel Planning, as site specific NEPA is not a part of this plan, but it makes determinations on travel. The new plan should be much more of a [Idquo]zoning[rddquo] document, so that General Forest has some meaning, rather than a patchwork map of small prescriptive definitions of Primitive Motorized, Primitive Non-Motorized, Rural, etc. Larger zones would provide much more future planning opportunities. None of us have a crystal ball, so flexibility needs to be built into the FP.

In a recent presentation at the 2021 Colorado 600 ride in Crested Butte, District Ranger Matt McCombs confirmed that since the 2010 TMP, NO new motorized routes have been added to the Gunnison, but a number of routes have been downgraded to non-motorized, and other non-motorized routes added. At the same meeting, both McCombs and Forest Supervisor Chad Stewart addressed the dramatic increase in motorized recreation since the Covid 19 Pandemic began. That increase has continued, as vehicle sales and use of existing vehicles has also increased. It is unreasonable to think that with that increase, and the projected doubling of the Colorado population by 2020, that the existing routes have adequate carrying capacity for demand. As such, it is critical that area designations provide for increased route construction for all types of recreation, as well as dispersed camping, and much to my dismay, glamping in ever larger mobile homes with garages. The draft FP doesn't do an adequate job of anticipating future forest demands, especially motorized recreation (including eBikes) and dispersed camping.

## Alternatives

As I review the document, I don't believe that Alternative A adequately and completely describes the current management situation, and as a result, makes comparison of all alternatives unreasonable and inaccurate.

I appreciate a few of the points in Alternative B, including the description of the Continental Divide National Scenic Trail (CDNST), including appropriate corridors. The TPA comments expound on this appropriately, and I hereby agree with them.

Alternative C is the closest to acceptable in my opinion. It provides a reasonable level of recreational opportunities, but the ROS is so piecemeal, that future increases in motorized recreational opportunities are virtually impossible, which is why I think a decision along these lines would be considered pre-decisional, and therefore illegal.

\* One specific route of concern is the bisecting of the Eyre (also spelled Erie) Basin trail by different prescriptions. This is a historic motorized route that was closed in the 2010 TMP, simply because there was a sliver of wildlife priority designation in the 1983 FP. Let's clear this up, so that it can be re-opened.

\* I disagree with the piecemeal patchwork of corridors around existing routes, rather than landscape scale zones for various uses.

\* Seasonal closures that provide short periods of use, with no regard for actual ground based conditions, are ineffective and lead to them being disregarded.

\* Wildlife based protections are frustrating at a minimum and ridiculous in many cases. The Doctor Park to North Bank trail was closed in the 2010 TMP on the basis of bighorn sheep population declines. But I have been unable to find any follow up from CPW on this herd, and whether reintroducing motorcycles would be acceptable, or if all human activity in the area should be stopped, as hikers, bikers, climbers, equestrians, and hunters are all active in the area. The plan needs to require scientific, rather than subjective review of any wildlife based closures, and determinations of impacts.

\* The TPA, et. al., comments provide a much more robust list of affected routes that have ROS conflicts and suggestions.

Alternative D is a non-starter in my opinion, as it is the most restrictive and adds additional defacto, and potentially permanent, Wilderness. Having been heavily involved in the Colorado Wilderness Act of 1991, I can say with confidence that all USFS areas in Colorado that have any chance of meeting the definitions in the Wilderness Act of 1964 have been included, and hundreds of thousands of acres that don't qualify have also been added to the inventory. We don't need any more capital W Wilderness, or small w wilderness. The GMUG already has an abundance of Wilderness and highly restricted land. The vast majority of the public uses land that is either motorized accessible, or very close to motorized accessible. During at least one of the virtual public input meetings, a USFS employee indicated that the GMUG had no interest in increasing Wilderness, and we applaud you for this outlook.

## Politics and Planning

The past few decades have seen dramatic increases in political pressure on the USFS to manage in appeasement to special interest groups, largely so called environmental groups that clamor for more Wilderness (often times more small [s]w[er] wilderness as well), and restrictions from logging (you are in the Dep't of Agriculture, because timber was considered a crop) and mining. I urge you to remind those folks that [d]If you have it, it was either farmed or mined[r]. Now we see a new set of political pressure, as groups have formed and insisted that the USFS should abide by plans such as Chaffee County Envision and the Gunnison Public Lands Initiative. I urge you to give these no more clout than a single voice. As a long time property owner in Gunnison County, I can assure you that I do not endorse or agree with the GPLI. While I don't have any more stake in Chaffee County than other Americans, I also don't endorse Envision.

## Winter ROS

As I reviewed the Draft FP, I was surprised at the lack of information and insight into winter uses. My property requires a snowmobile to access it in the winter, and I spend a fair amount of time in the Gunnison in the winter. Parsing small areas into OSV and non-OSV areas in the majority of forest is impracticable. With the exception of the winter Grand Traverse event, we very seldom see any non-motorized use more than 3-4 miles from a groomed trail. The other exception is the 10th Mtn. Division Hut system, which I have also had the opportunity to ski into. While it is common to hear that back country skiing and snowmobiling are incompatible, I can virtually guarantee you that when snow is deep, the skiers all utilize any track available, rather than moving into the fresh stuff. That is true on Cottonwood Pass and other locations, by skiers, snow shoers, and fat tire bikers.

## Summary

I recognize and appreciate the great deal of work that has gone into the Draft FP, and thank you for that effort, but I think that effort falls short. A final plan needs to be more clearly written, more clearly delineate the differences between the alternatives, utilize the Forest and/or District boundaries in tables and charts (rather than all new area descriptions) and use landscape scale prescriptions rather than patchwork prescriptions that virtually eliminate any future motorized route additions. More than anything, the final FP needs to provide the USFS and the public with a plan that is forward looking and adaptive to the needs of the public over the next several decades.

I again endorse Alternative C as the best starting point for a plan, but reiterate that it is not adequate. I also support the comments of the TPA, COHVCO, the Colorado Snowmobile Association (CSA), and Colorado Off Road Enterprise (CORE), submitted separately.

Sincerely,

Dennis Larratt

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