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Organization: CORE

Title: President

Comments: See the attached objection.

October 29, 2023

US Forest Service Rocky Mountain Region

Attn: Reviewing Officer

C/O Director of Strategic Planning 2nd floor

1617 Cole Blvd. Building 17

Lakewood, CO 80401

RE: Objection to GMUG RMP

Dears Sirs:

Please accept this correspondence as the Objection of Colorado Offroad Enterprise (CORE) to the GMUG National Forest Resource Management Plan and related analysis and decision documents. Our organization broadly supports the final decision, except for an inaccurate data issue that has come to light interacting with one of the proposed polygon changes.

1. Who we are.

CORE is a motorized volunteer organization created to partner with public land managers to work jointly on motorized road and trail management. We currently have four adopted trails in the Gunnison National Forest and have logged several thousand volunteer hours since 2017 in the Gunnison District.

2. Objection

We object to recommending the Union Roadless Area for a new Wilderness managed area. The NFSR 7752.3A alignment was incorrectly inventoried and displayed in the 2010 Travel plan. It was incorrectly mapped during the Colorado Roadless Inventory as the NFSR 7752.3A route goes back over 30 as a historically used route for recreation to the top of Cross Mountain.

Figure 1. Incorrect route alignment of NFSR 752.3A

Figure 1. shows the map from the 2010 Travel Plan in the Gunnison District and NFSR 752.3A being closed at the intersection with the private land parcel. We assume there is no documented FS easement across this property, so the decision closed the public route at the private property boundary. The roads in the red and white dashes after the private property depict the closed sections.

Figure 2. The actual on-ground alignment of NFSR 7752.3A

As you can see from Figure 2. the exact alignment of NFSR 7752.3A skirts the private property to the north and then approaches the Cross Mountain Summit. The light green boundary depicts the current Union Roadless Area. The Wilderness area recommendation must be amended to exclude the orange route.

Due to this incorrect route alignment, the Roadless area was drawn NOT to exclude the route.

Now, if the Wilderness polygon is not amended, it would result in an incompatibility for the management of a motorized route in a Wilderness (non-motorized zone).

During the public Zoom meetings to discuss the Forest Plan revision project, the GMUG presenter clarified that the project's goal was not to 'overlay a non-motorized zone overtop of a motorized

route". The documentation of the decision also mentioned the project's goal was not to compromise existing motorized recreation by creating an incompatibility through the Forest Plan Update.

Proposed resolution of Objection

The Wilderness proposal boundary designation should be amended slightly to exclude NFSR 7752.3A. There is little overlap, so adjusting the boundary would not result in a substantial loss in Wilderness acreage. If this boundary were to be changed to exclude the route, a future process could designate the route as a full-size motorized trail to remove the road classification and the conflict of having a road in a mapped Colorado Roadless Area.

3. We support the COHVCO, TPA, and CSA Objections

We would like to state our support for Objections 3(a), 3(b), 3(c), 3(d), 4(a), 4(b), 4(c), 4(d), 4(e), 5, 6(a), 6(b), 6(c) and 6(d). As with our Objection, we support correcting mapping data and adjusting proposed boundaries once the data is correct to avoid future incompatibilities for existing management.

We also agree not to create new Wilderness Areas where land has been deemed unsuitable for Wilderness and subsequently released back to multiple uses. We support further analysis before assigning route density standards.

4. Conclusion

CORE generally supports the final decision, and we appreciate the opportunity to participate in this project. We believe a few data corrections are necessary to help this decision avoid further conflict in the future.

Thank you,

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