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[ATTACHMENT FOLLOWS. PDF CONVERSION MAY RESULT IN ERRORS].

November 12, 2021

GMUG Forest Service Supervisor and Planning Team GMUG National Forest

2250 Highway 50

Delta, CO 81416

Submitted via http://fs.usda.gov/goto/gmug/forestplan_comments

Re: GMUG National Forest Draft Forest Plan

Dear Forest Supervisor Chad Stewart and GMUG Planning Team,

The Gunnison Public Lands Initiative (GPLI) appreciates the opportunity to comment on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Draft Forest Plan. The GPLI Working Group consists of stakeholders from ten community groups, the Gunnison Board of County Commissioners, and Senator Michael Bennet[rsquo]s Office. Interests represented in the Working Group include ranching, water resources, motorized recreation, conservation, mountain biking, hunting, and angling. This committed group of citizens began collaborating in February of 2016 to develop a community-driven, consensus- based vision for the public lands in Gunnison County. Out of years of rigorous analysis and engagement with the community, the GPLI Proposal identifies extraordinary landscapes to be protected and managed to sustain their exceptional recreation, wildlife, water, grazing, wilderness, and other values that our local public lands provide.

Since 2017, the GPLI Working Group has engaged with the GMUG National Forest as part of the Forest Plan revision process. In September 2017, former Forest Supervisor Scott Armentrout, Gunnison District Ranger Matt McCombs, and other agency staff met in Gunnison with the GPLI Working Group to explore the relationship between the Forest Plan revision process and the GPLI Proposal. Out of this discussion came a desire by the GPLI coalition to participate in forest planning to help ensure that the GPLI proposal would be incorporated into the revised Forest Plan. Other in-person meetings between the Working Group and GMUG staff were held to explore this opportunity. In addition, the GPLI has submitted multiple comments to the GMUG during the planning process, starting in November 2017 during the Assessment phase. In June of 2018, the GPLI Working Group submitted a formal scoping comment, stating: [ldquo]We respectfully ask that the GPLI Proposal be incorporated into the revised Forest Plan and analyzed in one or more alternatives, including the proposed alternative, in the environmental impact statement (EIS).[rdquo] The GPLI Working Group also submitted comments for both the Wilderness Inventory and Evaluation processes in January and September 2018. A comment was likewise submitted regarding the 2019 GMUG Working Draft, noting:

[ldquo]We are disappointed that little of the GPLI Proposal is reflected in the Working Draft for the GMUG Forest Plan. We reiterate our commitment to this process, to the proposal, and to a land management approach that embraces the consensus-based recommendations we have identified. We respectfully ask that the GMUG acknowledge and incorporate the GPLI[rsquo]s recommendations in the agency[rsquo]s preferred alternative going forward. A revised Forest Plan that includes the broadly-supported Special Management Areas and Wilderness recommendations developed by the GPLI will best serve the communities in Gunnison County and the broader public.[rdquo]

After reviewing the Draft Forest Plan and Draft Environmental Impact Statement, we unfortunately find ourselves in the same position that we did in 2019, disappointed that little of the GPLI Proposal is reflected in Alternative B of the GMUG Forest Plan. We would like to reiterate [ndash] as we have done consistently for four years [ndash] that the GPLI Proposal should be reflected to the greatest extent possible in the revised Forest Plan.

It is very important that the Forest Plan[rsquo]s prescriptions for use in SMAs[mdash]currently reflected in Table 21 of the Draft Plan[mdash]are accurate. Upon examination of Table 21, there are several prescriptions for GPLI areas that are incorrect. We reference again the GMUG[rsquo]s own assessment of the GPLI Proposal that [ldquo]theproposal was designed to not close any roads or trails[hellip]"

In the OSV suitability column in Table 21, Cabin Creek, McIntosh, Pinnacles, and Signal Peak should be [ldquo]None identified.[rdquo] Those are areas within the GPLI Proposal where the Forest Service has not yet analyzed for winter travel planning, and where the GPLI Working Group has decided not to affirmatively restrict OSV use, but instead to defer to the agency[rsquo]s winter travel management process when that occurs. We note also that for Cabin Creek, McIntosh, Pinnacles, Signal Peak, and Flat Top, the GPLI Proposal calls on the Secretary to develop and implement, as appropriate, seasonal closures for OHVs, OSVs, and bicycles to protect wildlife and wildlife habitat. Other specific recommended changes include:

[middot] Deer Creek[mdash]OSV suitability should be [ldquo]Yes, with existing restrictions.[rdquo]

[middot] Double Top Recreation Management Area[mdash]Motorized suitability should be changed to [ldquo]No New.[rdquo] Mechanized suitability should be changed to [ldquo]No new.[rdquo]

[middot] Flat Top Wildlife Conservation Area[mdash]OSV suitability should be [ldquo]Yes, with existing restrictions.[rdquo] Motorized suitability should be [ldquo]No New.[rdquo] GPLI has never intended to close motorized routes in that area.

[middot] Palisades Special Management Area-- This has been separated into two areas in the most recent version of the GPLI Proposal[mdash]McIntosh and Pinnacles. The prescriptions proposed in Table 21 for Palisades are fine for the McIntosh proposal, but summer motorized and mechanized suitability should be [ldquo]No new[rdquo] for Pinnacles.

[middot] Poverty Gulch Protection Area[mdash]Poverty Gulch is two SMAs in the GPLI Proposal[mdash]North and South, and these areas have different prescriptions. North Poverty should be [ldquo]No new[rdquo] for summer motorized and mechanized suitability. North Poverty OSV suitability should be [ldquo]Yes.[rdquo] South Poverty OSV should be [ldquo]No.[rdquo]

* Rocky Mountain Biological Research Area[mdash]The GPLI Working Group has changed the name of this area to the Rocky Mountain Scientific Research and Education Area. Summer motorized should be [ldquo]No new.[rdquo] Mechanized suitability should be [ldquo]Limited new.[rdquo] OSV suitability should be [ldquo]Restricted.[rdquo]
* Beckwiths Special Management Area[mdash]Summer motorized should be changed to [ldquo]No new.[rdquo]

Under the 2012 planning rule, forest plans must [ldquo]reflect . . . the unit[rsquo]s expected distinctive roles and contributions to the local area, region, and Nation [hellip].[rdquo]2 U.S. Forest Service lands within Gunnison County, and the experiences those lands offer, are distinct. This landscape[rsquo]s unique ecological and recreational niche within the National Forest System and the broader landscape drives the Working Group and the GPLI Proposal fits squarely within the requirements and purpose of the 2012 Planning Rule.

Coupled with its broad support created and informed by an exhaustive community-based process with formal and informal public input, the GPLI Proposal provides for a balanced approach that prioritizes community values in a way that reflects broader public interest.

We note the GMUG[rsquo]s statement on its revision website: [ldquo]We WILLuse your input to improve the final plan.[rdquo] We look forward to an improved final plan that acknowledges this community process and the balanced vision it proposes for Gunnison County public lands, and to continue working with you to achieve that.

Attached you will find a list of nearly 1,000 individuals and businesses that support the GPLI Proposal. Thank you for your consideration.

Sincerely,