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Comments: Alternative C is best but it needs a lot of work. This is the only alternative that complies with President Biden's EO 14008 to improve recreational access and goals of the USFS national and regional sustainable trails strategy. Proposed trail densities caps lack consistency with best available science and are not justified based on wildlife population counts published by CPW. This alternative needs a lot more flexibility and clarity around existing usages such as specific protection of routes previously approved in site specific travel management and would now be in areas where motorized usage would not be allowed. We also have a critical need for expansion of access on the forest. We are asking that the foundational issues in the Proposal be corrected and then the public is provided a revised draft plan to comment on.

1. We need more lands accessible for recreation on the GMUG to accommodate future demand. While Alternative C moves that direction, it fails to go far enough. Need flexibility on all types of issues- fires, floods, landslides and recreation etc.

2a. Alt A asserts a massive erosion of historical access has occurred without NEPA, based on a highly subjective inventory of the forest in the RMP. This management plan should reflect management designations now and in the future.

2b. USFS asserts throughout the process that ROS designations are only present on 40% of the GMUG, which is incorrect as 100% of the forest was given an ROS designation in the 1983 plan. Accurate baseline info on basic issues such as this precluded meaningful comment from the public and a revised draft base on accurate information needs to be provided.

3. Many existing NEPA analyzed routes traverse areas of inconsistent management in the Proposal. USFS staff has asserted these routes would not be closed due to these conflicting designations. This not reflected in any manner on maps or analysis. This must be clearly identified in the Proposal at the landscape level with a protective designation for NEPA analyzed routes.

4a. There has been a lot of concerns raised about negative wildlife impacts from recreation on the forest. This fails to recognize that currently CPW has concluded elk populations on the GMUG are 35% above target populations and deer populations are only 10% below target. Current management is highly effective at protecting wildlife on the GMUG. This success in management should provide a solid basis to maintain or expand access on the forest rather than application of draconian trail density restrictions. Requests such as protective designations for existing routes and expansion area designations are highly reasonable when populations are above goals on the GMUG.

4b. Alternative B would designate up to 740,000 acres of wildlife habitat on the Forest, but fails to explain why these areas were designated. Based on information from CPW, much of these areas are not habitat. Simply drawing these areas on a map does not make them habitat.

5a. Current planning provides for management based on habitat effectiveness, which mirrors many other agencies management for healthy ecosystems or attempting to address many issues, such as drought, fire and beetle impacts to benefit all phases of habitat. These factors will not be addressed in the management of habitat areas as the primary tool will be route density.

5b. The route density standard concept starts from the incorrect position that routes and recreation are the only factors impacting habitat and wildlife populations. Alt B&D remove habitat effectiveness but yet provides 1

mile of trail per mile is proposed for significant portion of forest. There is no basis for standard.

5c. There is no basis for the landscape level application of the 1 mile per mile trail and route density requirement. We are opposed to the arbitrary nature of the standard as the GMUG has approved route densities of up to almost 5x this density in ESA habitat areas and critical watersheds. This type of standard is in direct conflict with new USFS guidance regarding trails and wildlife and also conflicts with new Parks and Wildlife Guidance the document claims to be implementing.

6. There is simply not enough accurate information available to create an accurate analysis for winter motorized travel on the GMUG. We are requesting that any analysis of winter travel issues be conducted in subsequent winter travel plan updates. This will allow for a more meaningful analysis of winter travel in the update process. Any decisions based on current data would simply be inaccurate as data is not available at this time and any efforts to resolve questions like this at the forest level have been highly unsuccessful.

7. The Citizen petitions are the basis of Alternative D will have massive impacts to access on the GMUG despite their assertions to the contrary. These proposals bring Wilderness into areas where trails could be built and designate Wilderness in areas previously released by Congress.