

Data Submitted (UTC 11): 11/13/2021 4:39:41 AM

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Organization:

Title:

Comments: Howdy Folks,

I just recently found out about the Grand Mesa National Forest is proposing a new Forest Plan.

I happened to be involved the last time the Grand Mesa Forest dropped the gavel and initiated a "Forest Plan". Yeah, 1994, and I'm certain most all the USFS folks involved at that time are now retired. I still enjoy visiting the area forests and would like to continue multiple use on this forest.

I'm aware of a few new changes around 2003 approximately too. I now have a warm and fuzzy feeling Mr. Storch at this previous time, his crew, told the public "this newly about to be introduced Forest Plan would be a living document, it could be easily modified as needed". Yeah, I now know we/I was hoodwinked big time!

Because I was also told by Mr. Storch and crew the Travel Plan was indeed lacking Single Track Motorized Trails (STMT) and the USDA Forest Service would investigate and procure an additional 100 miles of trails collaborated by STMT visitors at that time. I really thought the USFS would collaborate with forest visitors and provide an additional 100 miles of STMT.

I thought/trusted at the time this forest being 3.2M acres of opportunity the 100 miles would become fruition . Oppression at best!

My last Grand Mesa Forest experience was a learning lesson for myself and how folks working for this section of government can get away with deceiving taxpayers and execute their own agenda for what their personal vision, opinions, and objectives of what the Forest should become.

Unfortunately for me, I now realize the USFS solicitation towards the taxpaying forest visitors choice are alternatives with no relevance other than procedure, especially leaning towards motorized travel on the Grand Mesa Forest. I believe the "plan" has already been initiated in advance by local and Washington USFS. The local public's comments sent to the Grand Mesa Forest are only required to satisfy the solicitation justifying "public comment" for government record regardless of contributors content simply achieving the necessary law and procedure documenting the government cares. That said I strongly believe the USFS soliciting said comments makes this travel decision a puppet show!

As I just recently found out about the USFS solicitation for comment and haven't had the required time to review in detail. I agree with the Trail Preservation Alliance recommended Alternative "C" towards the future of the Grand Mesa National Forest.

I believe: Multiple use makes multiple sense!

Please include the provided information below to be included in my comment. Surely the USFS employees are aware of "copy paste " however I believe these folks have actually acquired the time to read the "plan" and are very aware of the oppression that will be created if other Alternatives become the preferred choice. I agree with these folks word for word!

Establishing an accurate summary of current management on the forest has been a consistent problem in this DEIS and is a very concerning starting point. Generally, this plan is confusing, often inaccurate, and lacks a factual basis on many issues, such as wildlife populations.

Quick Thoughts on the Plan

Alternative A - fails to accurately reflect current management. This precludes our ability to even address possible impacts from management proposed in the other alternatives. We are concerned that throughout the process accurately reflecting current management has been a problem. Initial assertions from the USFS started with only 40% of the GMUG having recreational planning standards. While the USFS has recognized that is incorrect recently, there has been no analysis of this change provided to the public.

Alternative B - USFS has listened to our preliminary input. Alternative B has added areas suitable for motorized uses both in summer and winter. Alternative B also has a very small area of recommended wilderness. Additionally, the Forest Plan protects motorized access to the Continental Divide Trail and areas around the trail.

ALT B still fails to recognize the need for future flexibility as there are serious concerns with the proposal to designate 700k acres of wildlife habitat, which often is not wildlife habitat, and then apply the draconian restriction of a route density of only one mile of trail per square mile. Another problem with this alternative is that the Recreation Opportunity Spectrum (ROS) guidance compartmentalizes numerous motorized routes with a Semi Primitive Non-Motorized surrounding them in an ROS category that would restrict future trail development or possible reroutes.

Alternative C - IS the best for motorized uses because It appears to be the closest thing to current management, is the most flexible with less zoning restrictions, and allows more active management of the forest in the event of natural forces (fire, floods, landslides, etc.) and recreation development. However, it needs modifications such as Wildlife management area trail densities that are consistent with best available science and that are justified based on wildlife population counts published by CPW, specific protection of any route that has been approved in site-specific travel management and that now would be in areas where motorized usage would not be allowed, and the addition of verbiage from Alternative B that protects motorized access to the Continental Divide Trail and areas around the trail.

Alternative D - Simply WAY too many and restrictions- increases roadless/wilderness on the forest from 50% to 77% (1.5 million acres to 2.3 million acres). This alternative is simply a non-starter for us given the crushing impacts it would have on recreational access.

#### Detailed Concerns on the Plan Flexibility

There simply needs to be more lands accessible for recreation on the GMUG to accommodate future demand. While Alternative C moves in that general direction it fails to provide needed access. Generally, we need flexibility in the plan and only C provides sufficient flexibility on all types of issues- fires, floods, landslides and recreation etc. Recent super intense fires are going to become the norm and USFS now estimates that these areas could take hundreds of years to return to normal due to the combined effect of drought, beetle and then fire. Given the rapid evolution of this issue, flexibility is the only answer in the RMP. Short- and long-term impacts of these fires will be a major barrier to any activity on the GMUG.

#### Current Management Confusion

There has been asserted to be a massive erosion of historical access that has occurred without NEPA, based on a highly subjective inventory of the forest in the RMP. This inventory is now presented as current management in Alt A despite all forest level travel efforts explicitly and clearly stating they are not changing current management decisions on the forest. We are unsure how changes of this scale have occurred. This is a management plan and should reflect management designations now and in the future. These designations are critically important to long term motorized access. The following chart summarizes the unacceptable nature of these changes of the inventory

	Summer ROS -Existing inventory	Primitive	Semi Primitive	Non-motorized	Semi Primitive	Motorized	Roadbed	Natural	Rural
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1991 GMUG Supplement (1983 allocation)	217,900	816,800	1,265,200	619,200	33,000				
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Current management	435,000	1,338,400	767,800	415,300	9,000				
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% Change of Forest	+7%	+18%	-18%	-7%	-.8%				
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% Change to Original	+100%	+64%	-39%	-33%	-73%				
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2a. Even if inventories were management decisions, USFS asserts throughout the process that ROS designations are only present on 40% of forest. This is utterly incorrect as 100% of the forest was given an ROS designation in the 1983 plan. ( pg. II-29). Those designations were specifically carried forward in the 1992 RMP Timber Supplement (pg. 4 of the FEIS.) and all other decisions we can locate. Failures to provide accurate baseline info on basic issues such as this precluded meaningful comment from the public on specific impacts which is why we are asking for a revised draft based on accurate information.

## Recreation Opportunity Spectrum (ROS) - Zoning Inconsistencies

3. Many existing NEPA analyzed routes traverse areas of inconsistent management in the plan. Throughout meetings it has been asserted these routes would be excluded from closures due to these conflicting designations with a corridor of consistent management. This is not reflected in any manner on maps or analysis. This must be clearly identified and we are unable to locate this in the plan. Existing site specific NEPA must be recognized and carried forward. Here is the link to the story maps for more information on ROS settings

## Story Map Series

This story map was created with the Story Map Series application in ArcGIS Online.

## Wildlife and Route Densities

4. There have been a lot of concerns raised about 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 which is attributed to winter kill issues from exceptional snowfall. This proves current management is highly effective at protecting wildlife on the GMUG.

4a. Alternative B would designate up to 700,000 acres of wildlife habitat on the Forest, but fails to explain why these areas were designated. Based on commercially available information from CPW much of these areas are not habitat. Simply drawing these areas on a map does not make them habitat and there remains large tracts of habitat outside these areas and the US Supreme Court recently struck down this type of arbitrary management processes.

4b. Current planning provides for management based on habitat effectiveness, which mirrors many other agencies' management for healthy ecosystems. Healthy ecosystem management is an attempt to address many issues, such as drought, fire and beetle impacts to benefit all phases of habitat. Many factors entirely unrelated to recreation or route density will negatively impact habitat effectiveness, such as the reintroduction of wolves in Colorado. While this challenge is totally unrelated to route density, these factors will not be addressed in the management of habitat areas as the primary tool will be route density.

4c. The imposition of only route density standards starts from the position that routes and recreation are the only factors impacting habitat and wildlife populations. Alt B&D remove habitat effectiveness and provide 1 mile of trail per mile is proposed for a significant portion of forest. There is no basis for standard or why the standard could not be 2 miles of trail per square mile. Upper tier roadless designations discussed 2 miles of trail per square mile and that was dropped due to huge negative impacts to recreation and the arbitrary nature of the standard. Also how does this standard relate to large open areas that the USFS just recognized as highly sought after and valuable in the development of the winter travel rule?

4d. What basis is there 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.

## Species Permitted Route Density

Species	Permitted Route Density
Greenback Cutthroat Trout	4.78
Canadian Lynx	1.39
Water influenced zone	4.56
Gunnison Sage Grouse - occupied	2.1
Sucker	2.57
Gunnison Sage Grouse -unoccupied	2.5

Colorado River Cutthroat Trout<sup>2.17</sup>

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.

Alternative D - Citizen based planning groups influence

5. The Citizen petitions are the basis of Alternative D will have massive impacts on access to 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. Candidly we were not even aware several of these efforts existed until the draft was released. These are impacts and we have worked with some of these interests to address impacts but these efforts have been unsuccessful. Often huge conflict across the petitions on management of issues or areas and that makes us question any assertion of broad community support for the proposal as these proposals simply don't even align with each other.

Appreciate your time and consideration.

Please accept my comment for record.

Kind regards,

Kevin Anderson