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Comments: We appreciate the opportunity to comment on your draft Forest Plan and draft EIS of the Grand Mesa, Uncompahgre and Gunnison (GMUG).

Ride with Respect (RwR) was founded in 2002 to conserve shared-use trails and their surroundings. RwR has educated visitors and performed twenty-thousand hours of high-quality trail work on public lands in Utah, and additional hours in Colorado. Over 750 individuals have contributed money or volunteered time to the organization.

RwR contributors have enjoyed recreating on the GMUG, and seek the chance to explore more of it. From Utah, some of the GMUG is rather close and convenient, such as motorized singletrack and ATV trail of the Uncompahgre Plateau. For Utahns and others around the world, some parts are a lifetime destination, such as Taylor Park. Mountains in Utah aren't as expansive or as tall as those in the GMUG, so OHV trails in the GMUG provide vital and unique riding prospects for us.

Therefore RwR supports the comments submitted by Trails Preservation Alliance (TPA) et al. that urge the following modifications to Alternative C:

1. The addition of verbiage from Alternative B that protects motorized access to the Continental Divide Trail and areas around the trail.
2. The addition of specific protection to any route that has already been approved as a motorized route in site-specific Travel Management by the FS. In particular any of these routes that have been proposed to be encompassed by a Primitive or Semi Primitive Non-Motorized ROS category.
3. Consistency between Wildlife Management Area trail densities and best available science that are based on wildlife population counts published by CPW.

That said, even Alternative C would unnecessarily zone nearly half of the GMUG as non-motorized in terms of ROS, so RwR recommends scaling back this expansion of non-motorized zones. "Half" may sound like balance, but non-motorized ROS zones are occupied by motorized routes in 0% of their acreage, while motorized zones are occupied by motorized routes in less than 1% of their acreage, so you can see that even motorized ROS zones would be overwhelmingly non-motorized as they have been ever since the current ROS zones were established in 1983. Motorized ROS zones provide managers the flexibility to consider adding a motorized route (including e-bike trails), while non-motorized ROS zones would prohibit such consideration for the life of the Forest Plan, which is twenty years in theory and forty years in practice if the current plans are any indication.

In all of your action alternatives, the expansion of non-motorized zones encompass the areas with the highest quality for trail development. Such development could range from a new e-bike trail to a short motorized trail to link existing routes or even a short loop road to establish a primitive campground that would substitute for the more dispersed camping that has increasingly challenged land managers. Such possibilities deserve consideration, and motorized access has slowly and steadily decreased since the current ROS zones were established in 1983, so there's simply no need to make ROS zoning more restrictive than it already is.

Please consider this position on ROS in another way. All three action alternatives' rigid changes to current ROS zoning are problematic for at least three reasons:

1. Creative planning solutions in unknown future conditions will be difficult under the proposed rigid zone changes. For example, in the future electric power will likely dominate the vehicle and bicycle markets, making such uses entirely suitable in many of the areas that the action alternatives propose to rigidly re-zone as non-motorized. GMUG planners will need the flexibility that the current ROS zones provide, to deal with that future

uncertainty.

2. These areas have not and would not depend on such rigid re-zoning for protection, as environmental review of trail development is onerous and will likely become only more onerous over the life of the forest plan.

3. The current ROS zones do not twist the agency's arm like the ones in the action alternatives would; rather, they provide the agency with needed discretion to meet the challenges of all issues.

For these reasons, we encourage the forest plan to keep less than a quarter of the GMUG in non-motorized ROS zones. Despite less than a quarter of the GMUG being zoned non-motorized since 1983, 99% of GMUG acreage has been closed to OHV use, so it's clear that the ROS restrictions from 1983 are more than adequate to ensure non-motorized opportunities for 38 years and counting.

In summary, please take a sober view of how ROS zoning has worked in practice, and zone modestly. Retain managerial flexibility so the agency can adapt to changing ground conditions and the fact that most OHVs of the next decade will be virtually silent via electric motors that can be powered by alternative sources of energy.

The mountainous landscape of the GMUG is spectacular and, through managerial flexibility and partnerships, we can maintain the health of that landscape along with the health of OHV recreation.