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First name: John

Last name: Howe

Organization: Colorado Plateau Mountain Bike Trail Association, Inc.

Title: President

Comments: USDA Forest Service

Rocky Mountain Region

Attn: Reviewing Officer, C/O Director of Strategic Planning

2nd floor, 1617 Cole Blvd. Building 17

Lakewood, CO 80401

CC: Samantha Staley

Grand Mesa, Uncompahgre and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

Re: Grand Mesa, Uncompahgre, and Gunnison National Forests Land Management Plan

The Colorado Plateau Mountain Bike Trail Association, Inc. (COPMOBA) is a 501(c)(3) non-profit organization based in Grand Junction, Colorado, with chapters in the Grand Valley, Delta, Montrose, and Ridgway.

COPMOBA works with partners to advocate for, plan, construct, and maintain non-motorized trail systems and associated resources in Western Colorado.

COPMOBA both supports identified plan components, and additionally hereby formally objects to specific informational status of the Land Management Plan for the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) and the associated Final Environmental Impact Statement (FEIS) and Record of Decision (ROD). We do so following the regulations in 36 CFR 219. The notice of opportunity to object was published in the Grand Junction Daily Sentinel on August 30, 2023 and the 60-day objection period thus ends on October 30, 2023.

COPMOBA objects to the following Plan components:

1) Inaccuracy of all maps, lacking inclusion of existing trail #756, Palisade Plunge, on the Grand Mesa National Forest.

COPMOBA supports multiple plan components, including:

- 1) Addition of Recreation Emphasis Areas
- 2) Clarifying that e-assist bikes are classified as a motorized activity
- 3) Forestwide Direction; Recreation & Trails specifics

Considering increasing recreation utilization of the GMUG National Forests, COPMOBA emphasizes the need for increased planning, maintenance, and construction of non-motorized trails. Uniquely, management of routes currently designated as non-motorized access should remain non-motorized. And organized and strategic maintenance activities of existing trails should be prioritized to initially address the growing needs of increasing recreational use. These needs and opportunities are apparent to COPMOBA in both the Uncompahgre and the Grand Mesa Forests.

In this light, COPMOBA supports and emphasizes the following identified Plan components:

Chapter 2. Forestwide Direction, Part III,

Subsection Recreation & Trails:

Management Approaches

FW-MA-REC-19: Improve trail systems by coordinating with municipalities, counties, states, other Federal agencies, and partners to allow for integration and connectivity. For existing trail systems, partner to better

ensure funding and resources for basic maintenance, including leveraging all available resources through outfitters and guides, other permitted uses, and the general public.

FW-MA-REC-24: To curtail resource damage arising from the creation of unauthorized trails and use within sensitive areas (e.g., riparian or high alpine), encourage use of National Forest System trails instead by improving existing National Forest System trails (maintenance attention, signage, or rerouting) in these areas and/or strategically placing natural barriers on unauthorized trails.

Subsection Trails (TRLS), COPMOBA support all identified Desired Conditions, Objectives, and Management Approaches.

Desired Conditions

* FW-DC-TRLS-01: A sustainable, diverse trail system is in place and maintained at least to the minimum standards appropriate for safe public access. National Forest System trails support multiple recreation use types that contribute to social and economic viability in the plan area, and connect established towns and developed recreation sites to the surrounding landscape. National Forest System trails are designed and maintained in a manner that ensures resource protection and facilitates positive visitor experiences. National Forest System trails accommodate a variety of use types across a variety of terrain designed for a variety of skill levels. New trail development is concentrated in areas close to communities where open road and trail densities, and human activities, are already high (e.g., MA 4.2 - EMREC). Development of stacked, looped, and/or stacked-loop trails are considered in appropriate areas and circumstances. National Forest System trails are clearly marked, particularly where routes cross ownership and jurisdiction. Trailheads adequately accommodate the levels and types of use occurring along the system within the prescribed desired recreation opportunity spectrum (ROS) settings and are adjusted based on resource needs and use demands.

Objectives

* FW-OBJ-TRLS-02: Annually, maintain at least 500 miles of National Forest System trails, per the INFRA database definition of "maintained to standard" or other such similar standard that may be implemented by the Washington Office Trails Program. Trails are prioritized by those located in recreation emphasis areas (MA 4.2 - EMREC), by amount of use, and those where use is causing unacceptable resource damage (FW-STND-REC-08) and/or presenting hazards outside of the trail class. See also the Forestwide desired condition for partnerships, PART-01.

Management Approaches

FW-MA-TRLS-03: When managing trails and considering new trail developments, use Colorado's Guide to Planning Trails with Wildlife in Mind (Colorado Trails with Wildlife in Mind Taskforce (2021)). This guide, and other best practice guides, are resources that the GMUG National Forests should use to help identify ways to contribute to sustainable recreation management and wildlife conservation.

Respectfully Submitted,

John Howe

PresidentDate: October 30, 2023

Colorado Plateau Mountain Bike Trails Association, Inc. (COPMOBA)