



January 15, 2018

Attn: Forest Plan Revision Team
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 South Main St
Delta, Colorado 81416

Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) - Forest Plan Revision, Wilderness Inventory Comments

Dear Forest Plan Revision Team:

Please accept these comments regarding the **Grand Mesa, Uncompahgre and Gunnison National Forests - Forest Plan Revision, Wilderness Inventory** on behalf of the Trails Preservation Alliance ("TPA"), the Colorado Off-Highway Vehicle Coalition ("COHVCO") and the Colorado Snowmobile Association ("CSA"). Prior to presenting our comments, the Organizations believe a brief summary of each Organization is necessary to provide context for our remarks. The TPA is a volunteer organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse trail multiple-use recreational opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users in Colorado seeking to represent, assist, educate, and empower all motorized recreationists in the protection and promotion of multiple-use and off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations. The CSA was founded in 1970 to unite winter-motorized recreationists across the state to enjoy their passion. The CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with

Federal and state land management agencies and local, state and federal legislators. The TPA, COHVCO and CSA are referred to collectively in this correspondence as "The Organizations".

1. Wilderness Areas. We certainly understand that only Congress can designate Wilderness areas per the Wilderness Act of 1964. However, we also understand that the Forest staff has the ability to recommend areas for Wilderness designation. The Organizations do not support any additional Wilderness designated areas within the GMUG. Any additional Wilderness areas would concentrate use on a reduced inventory of multiple-use lands and decrease the ability to remove fuels, fight fires or actively manage the lands to promote forest health. Furthermore additional Wilderness will concentrate use, shrink the future reservoir of lands for multiple-use, increase environmental impacts and reduce user satisfaction. The continued loss of multiple-use lands will diminish the capacity of the land for future generations to use and recreate on, violating the intent of the Planning Rule for sustainability. This concentrated use will degrade user satisfaction and harm tourism, which so many of our rural communities depend upon.
2. Colorado Roadless Rule. The Organizations have concerns that the Roadless Rule is often used as a lever for the expansion of Wilderness areas. This is a misapplication of the Roadless Rule, as Colorado has developed its own rule that specifically identifies motorized trails as a characteristic of a Colorado Roadless area; 1) While Roadless areas have limitations on road construction and heavy maintenance, multiple-use trails are entirely outside the scope of the Colorado Roadless Rule, 2) Trail networks to include motorized trails may be constructed and expanded in Colorado Roadless areas.
3. The following areas are adjacent to or in close proximity to existing Wilderness and contain existing popular motorized/multiple use routes and infrastructure and are not suitable for Wilderness designation. These comments were developed utilizing the GMUG's web based, interactive map posted to the GMUG Planning Website (<https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=f79028627ef64aa49c906088b59b6020>), current GMUG Motor Vehicle Use Maps (MVUMs) and local knowledge:
 - a. Map Area # 91, Name: Tomahawk, This area contains NFST # 820
 - b. Map Area # 155, Name: Matchless Mountain, This area contains multiple roads and trails
 - c. Map Area # 146, Name: Granite Basin, This area contains multiple roads and trails
 - d. Map Area # 150, Name: American Flag Mountain, This area contains multiple roads and trails
 - e. Map Area # 127, Name: Gothic, This area contains multiple roads and trails
 - f. Map Area # 84, Name: Cannibal Plateau, This area contains multiple roads and trails namely NFSTs # 457, 458, & 464 and NFSR #788

- g. Map Area # 58 & #65, Name: Turret Ridge & Failes Creek/Soldier Creek, This area contains multiple roads and trails (e.g. Owl Creek Pass NFSR #858
- h. Map Area # 57, Name: Cimarron Ridge, This area contains multiple roads and trails
- i. Map Area #? (Small Roadless area north of the Lizard Head Wilderness area), Name: Wilson, This area contains multiple roads and trails (e.g., NFSR #645 and NFST #421)

The Organizations would welcome a discussion of these topics and any other challenges that might be facing the GMUG National Forest at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell (719) 338- 4106 or William Alspach, P.E. at 675 Pembroke Drive, Woodland Park, CO 80863. Mr. Alspach's phone number is (719) 660-1259 and his email is williamalspach@gmail.com.

Sincerely,



Scott Jones, Esq.
TPA Authorized Representative
CSA/COHVCO President



D.E. Riggle, Director of Operations
Trail Preservation Alliance