



October 30, 2024

Senator Michael Bennett
261 Russell Building
Washington DC 20510

Senator John Hickenlooper
SR 374 Russell Building
Washington DC 20510

Preliminary thoughts on GORP 2024

Dear Senator Bennett and Senator Hickenlooper:

Please accept this correspondence as the ongoing opposition of the above Organizations to the Gunnison Public Lands Initiative/ GORP 2024 Proposal. We believe it is important for us to note that the Organizations have previously supported community efforts for legislation of public lands management, such as the Hermosa Creek Watershed Proposal that was passed into law in 2016. The GORP proposal is simply not the Hermosa Creek proposal when they are compared. Our Organizations were vigorously involved in the development of the recently completed GMUG National Forest Resource Management Plan. The Organizations continue to support the management Alternative that was the result of this effort. During this effort, we are also aware of the almost complete opposition of the public to Alternative D of the draft RMP. The Organizations cannot overlook that GORP almost directly reflects what the USFS proposed under Alternative D of the Plan which was based on numerous citizen management proposals for the forest. Why would the motorized community resurrect an Alternative of the RMP that was soundly defeated in the RMP development? While the Proposal asserts to have strong community engagement, we cannot overlook the fact the USFS RMP draft proposal received more than 10k comments alone.

1. Long term impacts to multiple use.

The Organizations are very concerned that the Proposal is seeking to significantly alter the multiple use mandate. This Proposal would essentially allow counties to opt out of the multiple uses or redefine multiple uses on federal public lands in that county in the manner the locality finds acceptable. This is a concept that would directly undermine the value of the multiple use mandate entirely as this would remove the public from public lands. The Organizations would also be very concerned that the cumulative impacts of this decision could be immense if numerous counties took this route of management. Over the passage of time, every county that had public lands in the State could have pursued similar legislation to the Proposal and a functionally made the multiple use concept irrelevant. This challenge from the Proposal cannot be overlooked and would be vigorously opposed by the Organizations.

2. Three year window for travel planning is of no value.

While the press releases and many letters of support assert that there will be significant recreational benefits from this legislation passing, the Organizations are simply unable to locate these benefits. The Proposal requires a travel management plan within 3 years of passage, we are simply unable to

identify how this is a benefit of the Proposal. This is directly evidenced by the efforts of the USFS to commence winter travel planning in the Proposal area within the next several months. This means winter travel issues could be resolved before the 3 year window in the Proposal was reached even without passage of the legislation. We fail to understand how these provisions could be a benefit for recreation.

3. No new roads and no future travel management.

We have concerns about the 3 year mandatory planning requirement in the Proposal for summer usages as well. These concerns explode as the Proposal clearly states there will be no new trails developed that are not identified in the Proposal or in the TMP adopted as a result of the Proposal. The loss of the ability to do travel management in the future is immensely problematic. This seems short-sighted as we are intimately aware that in the future there could be a need to address issues like camping access and developed camping infrastructure. We are also aware one of the most compelling needs we face in the planning area is a lack of trailhead access points. These critically needed resources would be prohibited in the future as TMPs are often necessary to connect campsites or to push parking and trailhead facilities off existing roadways. Again, the Organizations are unable to support an assertion that a limitation such as this would be a benefit for recreation in any form.

We are even more troubled with the Proposal prohibits this critically needed infrastructure such as campsites and trailheads cannot be built as §11 Paragraph H of the Proposal entirely prohibits the construction of any new roads in most planning areas designated as follows:

“(h) ROADS AND TRAILS.—

(1) IN GENERAL.—Except as provided in paragraph (2), no road shall be constructed in a covered area.”

The Organizations believe the exceptionally short-sighted nature of this standard is immediately apparent when comparing the photos below that were provided to a local newspaper and made the rounds on social media of the current parking situation at a Wilderness Trail head outside Crested Butte.



The Organizations would agree with the major sentiment from the public that this situation was not acceptable and should be corrected. Rather than streamlining resolution of this type of problem, the Proposal would force this type of situation to be the new management model for issues of this type. People would be forced to park on shoulders and block access while impacting resources as roads could not be created to access new planned and managed parking infrastructure. The Organizations submit these photos are evidence of a compelling need for management and not the preferred management response to the issues being faced. Again this is not a recreational benefit.

4. EO 14008 and EO 2020-008 has not been complied with

The direction of the Proposals management areas also conflicts with President Biden's EO 14008 and research conducted by CPW in the development of the 2024 Statewide Comprehensive Outdoor Recreation Plan and recent mandates from Governor Polis in EO 2020-008. President Bidens EO 14008 specifically identified the strategic goal of improving recreational access and economic contributions from recreation to local communities for agency three different times. §214 of EO 14008 clearly mandates improved recreational access to public lands through management as follows:

“It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America’s natural treasures, increase reforestation, **improve access to recreation**, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented.”

The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in §215 of the EO as follows:

“The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, **improve access to recreation**, and address the changing climate.”

§217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows:

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, **revitalizing recreation economies**, and curbing methane emissions.”

The Organizations are aware significant concern raised around the 30 by 30 concept that was also memorialized in EO 14008. While the EO does not define what “protected” means, the EO also provided clear and extensive guidance on other values to be balanced with. From our perspective the fact that large tracts of land in the planning area are Congressionally designated or managed pursuant to Executive Order far exceeds any goals for the EO. While there are overlap between these categories

that precludes simply adding these classifications together, this also does not alter the fact the planning area has achieved these goals of 30% of acreages being protected.

Governor Polis EO 2020-008 clearly identifies the need to create recreational opportunities moving forward that are sustainable as follows:

A. DNR, in consultation with CPW and the CO-OP, shall develop the Initiative to achieve the following goals:

1. Ensure that Colorado's land, water, and wildlife thrive while also providing for equitable and safe access to quality outdoor recreation experiences;
2. Convene voices from different outdoor interests, races, cultures, ages, and sectors through the Regional Partnerships to identify regional priorities and strategies;
3. Collaborate with Regional Partnerships to develop a State-level vision and Plan for conservation and recreation; and
4. Identify stable and long-term funding from multiple, sustainable sources to provide for the critical investments needed to conserve Colorado's landscapes, rivers, wildlife, sensitive habitats, and recreational opportunities.

Again, given the strategic and long-term nature of this requirement, we must express concern on the single opportunity to plan and provide sustainable recreation provided in the Proposal. The Strategic nature of the need for expanded sustainable recreational infrastructure in an ongoing manner is again highlighted in the manager research survey conducted by CPW in relation to the most recent SCORP. Overwhelmingly the most sought after resource is expanded sustainable recreational access. A copy of this research is attached as Exhibit "A" to these comments. Again, this type of demand does not align with the single planning opportunity provided in the Proposal.

5. Funding challenges.

The Organizations would be remiss if we did not state our concern that any planning could be undertaken within the 3 year window given the immense cuts to USFS operational budgets that was just provided in the Continuing Resolution just passed. Even with 128 Forests in the Country absorbing \$500m to \$750m in additional cuts is problematic. Future budgets look even more grim for land managers. Our Organizations were immediately contacted by several managers to help understand what could and could not be funded by the OHV grants provided through CPW as they were struggling to provide basic services. In this type of climate asserting the UFSFS can do anything is problematic, and this assertion would open the discussions to a situation where the motorized community is supporting basic forest operations with OHV grants and then federal money is being used to close trails rather than support basic operations. This would be entirely unacceptable but a real possibility as this version of GORP has no budget or funding designations or streams identified in a financial note.

In a troubling development much of the language proposed mirrors much of the language that is being implemented in the Bears Ears Monument and numerous other special designations

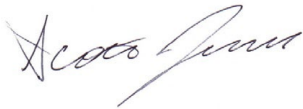
throughout Utah. We have been very involved in this effort and can tell you that many of the interests in Utah are deeply opposed to the standards once they have the ability to see these standards applied on the ground. These efforts have directed large sums of existing money away from site specific projects and towards updating various plans that were recently completed.

6. Conclusion.

The Organizations must oppose the Proposal given the long term impacts to the multiple use mandates that have proven highly successful in developing large scale public support for public lands. The loss of the benefits of multiple use mandates cannot be overlooked. The Organizations are also very troubled that many of the asserted benefits from the proposal, such as three-year windows to start travel planning, are not benefits but rather simply reflect an effort the USFS has already started. We are also deeply concerned that the Proposal immediately prohibits road construction in any subsequent planning and then requires this round of planning to be the last on the forest. The Organizations believe this is hugely short-sighted.

The Organizations must voice our support for current management of the planning area, which is the result of years of effort and tens of thousands of comments. The Organizations and our partners remain committed to providing high quality recreational resources on federal public lands while protecting resources and would welcome discussions on how to further these goals and objectives with new tools and resources. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / scott.jones46@yahoo.com), Chad Hixon (719-221-8329 / chad@coloradotpa.org).

Respectfully Submitted,



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Marcus Trusty
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