

August 30th, 2017

Grand Mesa, Uncompahgre and Gunnison National Forests  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO 81416

**Re: GMUG Forest Plan Revision Assessment Comments**

Dear Plan Revision Team,

Thank you for taking the time to consider these Assessment Phase joint comments from Outdoor Alliance and Outdoor Alliance Colorado regarding the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision #51806. Outdoor Alliance is a coalition of eight member-based outdoor recreation organizations: American Whitewater, American Canoe Association, Access Fund, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, and the Mazamas. With a presence in all 50 states, Outdoor Alliance has a collective membership of nearly 200,000 individuals and a national network of more than 1,000 local clubs. Together, our network reaches nearly 400,000 passionate outdoor enthusiasts. For the past ten years, Outdoor Alliance has been bringing together the voices of paddlers, mountain bikers, hikers, climbers, and backcountry skiers to conserve America’s public lands and protect the human-powered outdoor experience. Our work is unique because it seeks to balance both conservation *and* sustainable recreational access.

In Colorado, this work is achieved in part through our regional partnership Outdoor Alliance Colorado – a coalition of five member-based organizations representing the state’s human-powered outdoor recreation community. The coalition includes Access Fund, Colorado Mountain Club, American Whitewater, Colorado Mountain Bike Association, and the American Alpine Club. The Outdoor Alliance community has the strength of 60 affiliated organizations and 12,000 members within 100 miles of the GMUG forest and represents the broader interests of the millions of Coloradans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our state’s public lands, waters, and snowscapes.

Because of the importance of addressing recreation spatially rather than merely programatically, the Assessment is a key part of the planning process. Forest Planners must have information that enables them to take account of where people go on their National Forests, when they go there, and why. Recreation does not occur at random across Forests; rather, recreationists are drawn by unique and particular attributes like aesthetic trail qualities; whitewater difficulty, quality, and hydrology; snow conditions and topography; and rock quality

and geology. To appropriately develop required plan components like geographic and management areas--as well as to complete the Wild and Scenic and Wilderness inventories--planners must begin with detailed spatial and qualitative information on recreational resources. Outdoor Alliance and Outdoor Alliance Colorado would like to offer our assistance in the collection of this essential data.

## The Importance of Outdoor Recreation in Colorado

Colorado's unparalleled natural resources and outdoor recreation opportunities are defining features of our state – they are Colorado's heritage and a primary reason individuals and businesses make Colorado home. Colorado's *State Comprehensive Outdoor Recreation Plan* underscored the importance of the outdoors to Coloradans stating, "Overwhelmingly, 90 percent of Coloradans participated in some form of outdoor recreation in Colorado over the past year." Their survey also revealed that, "60 percent of Coloradans will either greatly increase or somewhat increase their participation in outdoor recreation over the next five years."<sup>1</sup>

Colorado is a testament that building a strong and resilient economy starts with creating a great community where people want to live. The top reasons people choose to live in Colorado are the state's clean environment, access to public lands and outdoor recreation opportunities, and residents' ability to maintain a healthy outdoor lifestyle.<sup>2</sup> The result is evident in the Outdoor Industry Association's 2017 report that found the outdoor recreation economy contributes \$28 billion dollars and 229,000 jobs to the Colorado economy and \$9.7 billion dollars to Coloradans in the form of wages and salaries.<sup>3</sup> Colorado's outdoor recreation opportunities are an economic powerhouse that makes the state a prime tourism destination and an amazing place to live, work and to raise our families.

## Outdoor Recreation in the Grand Mesa Uncompahgre and Gunnison National Forests

The Grand Mesa Uncompahgre and Gunnison (GMUG) National Forests stretch from the high Sawatch Range peaks of the Continental Divide to the plateaus and canyons of Colorado's Western Slope encompassing some of the most remote and beautiful landscapes in Colorado. In their combined three million acres of land, the Forests house 3,000 miles of trails and routes, 300 lakes, and 3,600 miles of rivers and streams. Outdoor Alliance's GIS Lab has identified 43 miles of hiking, 932 miles of hiking and equestrian, 96 miles of mountain biking, 532 miles of hiking, equestrian and mountain biking, 136 miles of cross-country and backcountry ski winter trails, over 924 climbing routes, and 49 miles of paddling as high-value recreation sites.

The GMUG National Forests count among their neighbors some of Colorado's most iconic outdoor recreation meccas including Crested Butte, Gunnison, Grand Junction, and Telluride.

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<sup>1</sup> *Strategies for Sustaining Colorado's Outdoor Heritage; 2014 Colorado Statewide Comprehensive Outdoor Recreation Plan* (2014), 35.

<sup>2</sup> Colorado College, *Conservation in the West Poll* (2015).

<sup>3</sup> Outdoor Industry Association, *Colorado's Outdoor Recreation Economy Report*, <https://outdoorindustry.org/state/colorado>, (2017).



to recreate on the world class Continental Divide, 401, and Teocalli Ridge trails; to summit alpine peaks like Sneffels and Wilson; to ice climb classic routes in the Ames area; to rock climb at traditional and sport climbing areas such as the Ophir and Pipeline Walls; and to find solitude in the Collegiate Peaks, Maroon Bells-Snowmass, and the Forests' eight other Wilderness areas. Outdoor Alliance's grassroots network in Colorado and GIS inventory of landscapes and recreation may be helpful to the Forest Service in protecting this treasured region through the Forest Planning process.

## GMUG Forest Plan Assessment Considerations

We applaud the Forest Service for implementing the 2012 Planning Rule and expanding the role of public process in guiding the development of Forest Plans. Outdoor Alliance participated in designing the new Planning Rule and continues to prioritize engaging in its implementation. As the Forest Service seeks to secure improved management the Grand Mesa, Uncompahgre, and Gunnison National Forests through the Forest Plan revision process, we urge the agency's consideration of the following in the Assessment Phase of the Forest Plan Revision Process:

- **The Draft and Final Forest Plan should prioritize recreational access.** The GMUG's approximately 3.4 million visitors are a testament to the need to prioritize the outdoor recreation experience in these Forests. Human-powered recreation is growing in both summer (including climbing, hiking, paddling, mountain biking) and winter (including alpine touring, splitboarding, telemarking, cross country skiing, snowshoeing and winter mountaineering).
- **Protect and manage key areas for human-powered recreation.** In order to minimize impacts to sensitive lands, waters, snowscapes and habitats, and to reduce user conflicts, please consider new recommended landscape protections and designations, including:
  - Management and geographic areas focused on recreation such as those described in the Forest Plan Revision for the Colville, and the Okanogan-Wenatchee National Forests' *Briefing: Special Areas and Management Areas* (attached);
  - New Eligible Wild and Scenic River protections;
  - New Recommended Wilderness protections; and
  - Other potential Congressional designations, including potential National Recreation Areas, aimed at protecting human-powered recreation experiences and opportunities on certain exceptional landscapes.
- **Leverage volunteer groups for trail maintenance.** Trails and recreation sites are heavily used and in dire need of maintenance. Groups of active volunteers exist within local communities to help with this type of work, which needs to be better planned, coordinated, and executed. *The National Forest Trails System Stewardship Act of 2016* calls on the Forest Service to significantly increase the use of volunteer stewards. The GMUG could be a leader in this effort.



- **Promote sustainable, recreation-based jobs and recognize the role of outdoor recreation in attracting businesses and workers across industries.** Locals and visitors alike come to hike, climb, camp, bike, and ski in the GMUG's wild backcountry. These recreational amenities are essential to local economies and should be a prime consideration in the development of the revised Forest Plan.
- **Map and preserve wild roadless lands** These lands are essential to wildlife conservation and recreation. Habitat corridors for migration and movement should be mapped and preserved. Roads should be managed appropriately to minimize the spread of invasive weeds, habitat loss, and degradation of water quality, but management should be done in a manner cognizant of recreation needs such as access to trailheads and river access points.
- **Engage and collaborate with local stakeholders.** Exemplary management of the National Forests must be locally-informed and collaboratively developed and backed. Specifically, the *Forest Partnership* collaborative stakeholder group employed in the Nantahala and Pisgah National Forests Plan Revision is a successful model to draw inspiration from. Please also consider meeting directly with local representatives of Outdoor Alliance's Colorado regional partnership including Access Fund, Colorado Mountain Club, American Whitewater, Colorado Mountain Bike Association, and the American Alpine Club.

### Collaboration with the Outdoor Recreation Community

In addition to the above recommendations, Outdoor Alliance would like to offer our community's assistance to help the planning team balance sustainable outdoor recreation and conservation with other uses such as grazing and energy and mineral extraction. Outdoor Alliance would like to collaboratively work on solving recreation related issues, and specifically offer to do the following:

1. Provide GIS recreation data and maps to the Forest Service to ensure that the recreation and conservation voices are backed by data in the planning process. This data has been provided to the GMUG planning team's GIS specialists in tandem with these comments. An online version may be found at: <http://bit.ly/GMUG-OA>
2. Host maps from disparate stakeholders to facilitate location-based decision making. During the Nantahala and Pisgah National Forests Plan revision, Outdoor Alliance hosted an ArcGIS online geospatial dataset from all partners. The data overlays allowed stakeholders to pinpoint potential conflicts and focus conversation on the small amount of areas where compromise was needed greatly simplifying the process. Examples can be found at: <http://bit.ly/2xNPcue>
3. Raise awareness of the Forest Planning process and generate comments in support of a strong Draft Plan through events, communications content, and media outreach to local



communities and the Outdoor Alliance coalition.

4. Host an outdoor recreation roundtable in partnership with the Forest Service to bring Outdoor Alliance affiliated organizations and their community leaders into direct and collaborative discussion with GMUG planning staff (recognizing that the Forests are still developing strategy for how and when in the planning process to engage such groups).
5. Build a grassroots foundation for protections beyond the Forest Plan, including opposition to public land transfer, conceptual plan for future Wilderness, Wild and Scenic, and possibly other Congressional designations, with the goal of broad public support.

We look forward to collaborating with the GMUG planning team to help protect the 3,161,900 acres of the Grand Mesa Uncompahgre and Gunnison National Forests – and the recreation and local economies which depend upon these lands and waters.

Best Regards,



Jason Bertolacci  
Founding Member  
Outdoor Alliance Colorado



Louis Geltman  
Policy Director  
Outdoor Alliance

cc: Adam Cramer, Executive Director, Outdoor Alliance  
Nathan Fey, Colorado River Program Director, American Whitewater  
J.B. Haab, FRCS Field Manager, Access Fund  
Julie Mach, Conservation Director, Colorado Mountain Club  
John McCauley, Regional Organizer, Outdoor Alliance  
Maria Millard Povec, Policy & Advocacy Director, American Alpine Club  
Gary Moore, Executive Director, Colorado Mountain Bike Association



# OUTDOOR ALLIANCE

## BACKGROUND ON OUTDOOR ALLIANCE

Outdoor Alliance is the only organization in the U.S. that unites the voices of outdoor enthusiasts to protect public lands and waters and ensure they are managed in a way that embraces the human-powered experience. Our authentic, place-based, passionate community is comprised of members that are historically and socially distinct from those in the traditional environmental community. On average, they are 30 years younger and bipartisan—an unusual and extremely powerful combination in current-day conservation advocacy. Our memberships have high rates of voter registration and are seven times more likely than comparable members of environmental groups to engage on complicated civic matters.

Outdoor Alliance leads a coalition to address the conservation and access issues of greatest importance to the human-powered outdoor recreation community. We work to:

***Transform outdoor enthusiasts into outdoor advocates*** —We connect millions of climbers, paddlers, cross-country skiers, hikers, and mountain bikers to advance a powerful voice for outdoor recreation. We work with our six regional networks, our seven member organizations, and dozens of outdoor businesses and partners to educate, engage and mobilize these outdoor enthusiasts with policy and advocacy content that is savvy, authentic, and inclusive.

***Secure meaningful protections for public lands that have significant conservation and social value*** —Outdoor Alliance identifies public lands with high recreation value that are eligible for further administrative or legislative protection, and works to secure their meaningful protection. We prioritize not only wild places but also those closer to where people live to ensure our work is relevant to a diverse population of outdoor users.











***Lead the outdoor recreation community as the trusted voice on public land conservation policy*** —We recognize that our public lands are home to different users and activities, from recreation to wildlife preservation to development. Our efforts to monitor, analyze, and respond to regulatory and legislative policies are bolstered by cutting-edge data from our GIS lab and innovative advocacy tools that results in the unmatched ability to unify and mobilize our community.

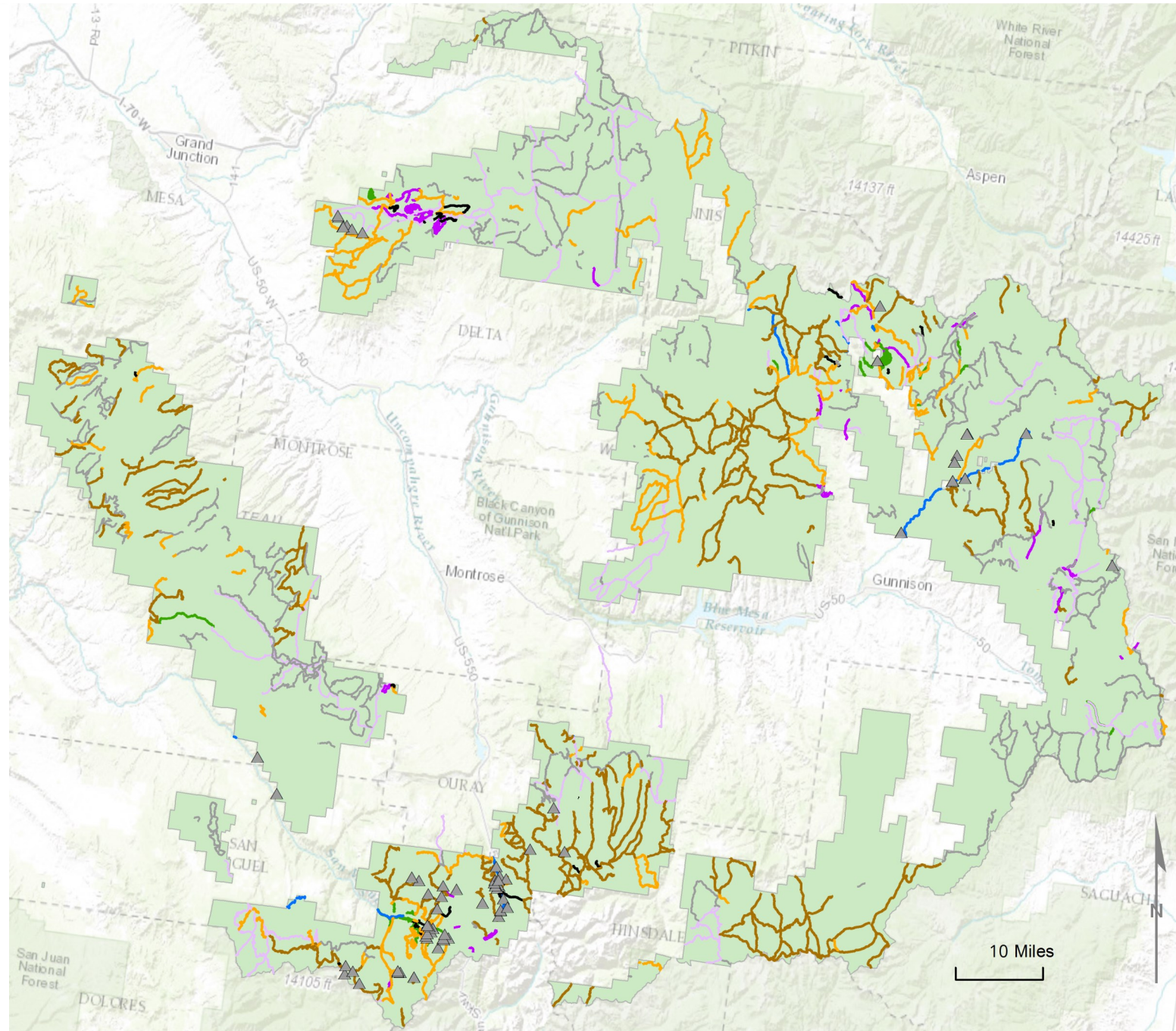




# Recreation Inventory of the GMUG National Forests

| Recreation                          | Miles |
|-------------------------------------|-------|
| Hiking                              | 43    |
| Hiking, Equestrian                  | 932   |
| Hiking, Mountain Biking, Equestrian | 532   |
| Mountain Biking                     | 96    |
| Paddling                            | 49    |
| Rock Climbing (Cliffs & Boulders)   | 172   |
| XC & BC Skiing                      | 136   |

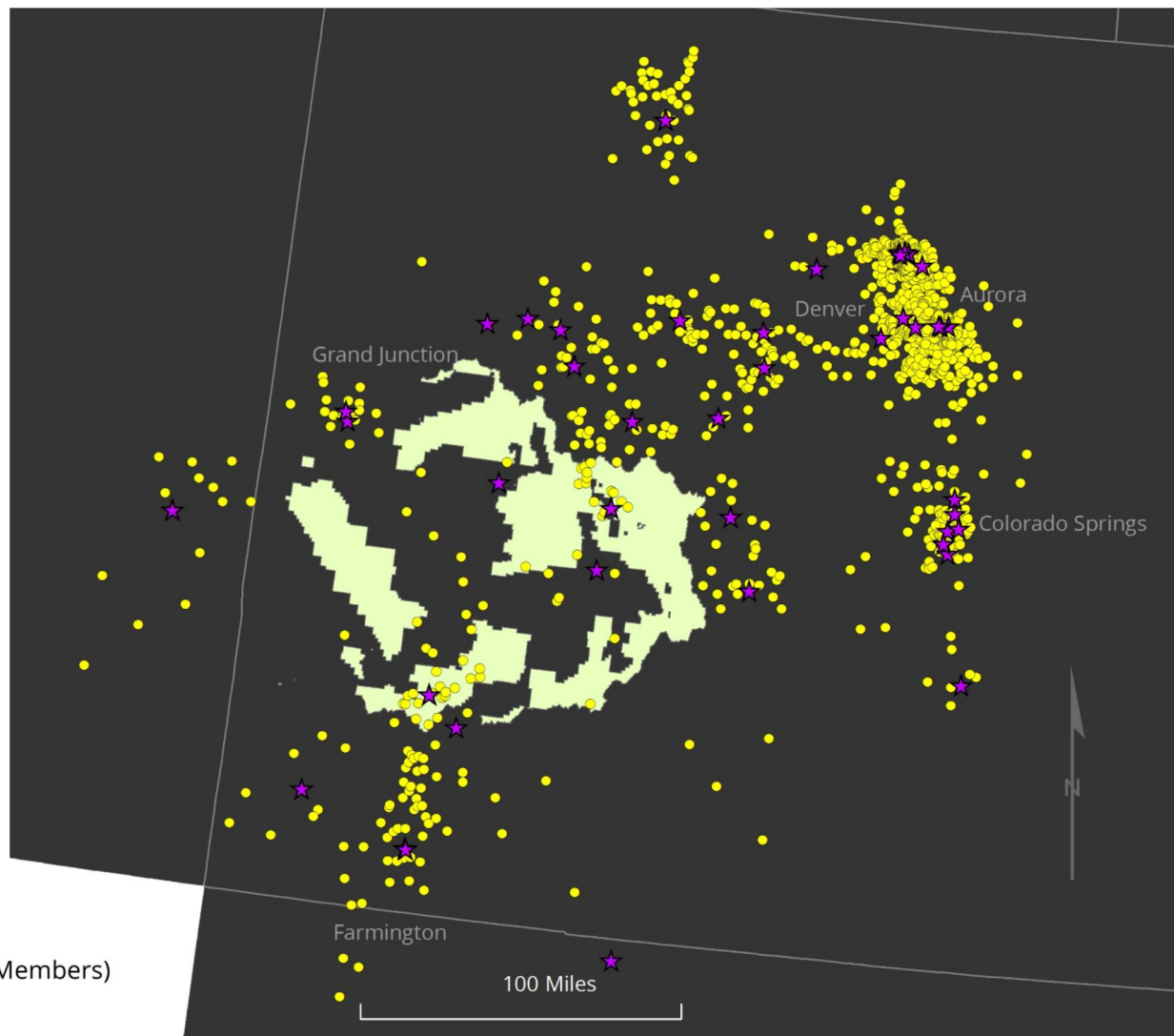
-  Hiking
-  Hiking, Equestrian
-  Hiking, Mtn Biking, Equestrian
-  Mountain Biking
-  Whitewater Paddling
-  XC & BC Skiing
-  Rock Climbing Areas
-  Motor Vehicle
-  Snowmobile
-  National Forest Boundary



## Members and Affiliates within 100 miles of the GMUG National Forests



|            |              |               |
|------------|--------------|---------------|
| Members    | AAC          | 2,282         |
|            | ACA          | 1,603         |
|            | AF           | 4,369         |
|            | AW           | 817           |
|            | IMBA         | 2,664         |
|            | WWA          | 263           |
|            | <b>Total</b> | <b>11,998</b> |
| Affiliates | ACA          | 19            |
|            | AF           | 13            |
|            | AW           | 8             |
|            | IMBA         | 12            |
|            | WWA          | 8             |
|            | <b>Total</b> | <b>60</b>     |



- ★ Affiliate Organizations
- Members (1 Dot = 10 Members)



# Forest Plan Revision for the Colville, and the Okanogan-Wenatchee National Forests August 2008

## Briefing: Special Areas and Management Areas<sup>1</sup>

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This paper presents further information on options for management of lands not included in a preliminary administrative recommendation for wilderness. The options fall under the following broad types:

**Special areas** - areas designated by law or statute or through administrative process.

**Management areas** - separate areas of a Forest designated in the forest plan where different uses and activities are generally suitable.

### Special Areas vs. Management Areas

#### Key Difference = who makes the designation decision

The time, effort, and complexity vary for designating special areas and management areas. While not absolute, management areas generally take the least effort and time to designate, while administratively designated special areas take more time and effort, and special areas designated by Congress typically take the most time and effort. The following table shows the authority that makes the designations.

| Designation                       | Designation Authority                                 |
|-----------------------------------|---|
| <b>SPECIAL AREAS:</b>             |   |
| Areas designated by law           | Congress  |
| Areas administratively designated | Secretary of Agriculture or a Forest Service official |
| <b>MANAGEMENT AREAS</b>           | Forest Supervisor                                     |

Categories of special areas and who has the authority to designate them are shown in the table on page 5. Note that statutorily designated areas can also be proposed to Congress by the public outside the plan revision process.

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<sup>1</sup> Additional information on special areas and management areas may be found in Forest Service Handbook 1909.12, Chapter 10

## Special Areas

Certain limited areas of National Forest System lands may have outstanding or unique examples of plant and animal communities, geological features, scenic grandeur, or other special attributes that merit special management. These areas are designated by law or may be designated administratively as special areas. Designated areas are managed to emphasize recreational and other specific related values. Other uses are permitted in the areas to the extent that these uses are in harmony with the purpose for which the area was designated. The law or decision designating each area provides specific objectives and guidelines for management of each area.

No provision in law requires the Forest Service to inventory, evaluate, and recommend special areas for designation, with the exception of wilderness and wild and scenic rivers. Forest plans may identify areas as special for various reasons without a formal designation.

Special areas, such as botanical areas or significant caves may be designated by the Responsible Official in approving a plan revision. Such designations are not final decisions approving projects and activities. Forest plans include special areas already designated by law (like Salmo-Priest Wilderness Area) or administrative process, such as Sherman Pass National Scenic Byway on Colville National Forest.

### Special Areas Designated by Law or Statute

Of all the possible special areas, there has been public interest in National Recreation Areas. National Recreation Areas (NRAs) are designated through law passed by Congress. In order to qualify as an NRA these areas have outstanding combinations of outdoor recreation opportunities, aesthetic attractions, and proximity to potential users. They may also have cultural, historical, archaeological, pastoral, wilderness, scientific, wildlife, and other values contributing to public enjoyment. The uses and activities allowed (the desired condition) within an NRA depends on the law designating the area and can vary widely. Some notable local examples include the following:

#### **Examples of National Recreation Areas (areas designated by law or statute)**

##### **Mt. Baker National Recreation Area**

The Mount Baker National Recreation Area was created in conjunction with the 1984 Washington Wilderness Act to accommodate and preserve the winter snowmobile use of the Mount Baker area in and around Schriebers Meadow. To preserve this use, management of the area focuses on providing snowmobile and cross-country skiing opportunities during the winter and non-motorized recreational uses during the summer season. The Mount Baker National Recreation Area differs from the adjacent Mount Baker Wilderness by allowing the use of snowmobiles when snow levels are sufficient (greater than two feet at Schriebers Meadow Trailhead).

### **Hells Canyon National Recreation Area**

The Hells Canyon National Recreation Area was established by Congress on December 31, 1975 under Public Law 94-199. The act that created the HCNRA states that “to assure that the natural beauty, and historical and archaeological values of the Hells Canyon area and the seventy-one-mile segment of the Snake River between Hells Canyon Dam and the Oregon-Washington border, together with portions of certain of its tributaries and adjacent lands, are preserved for this and future generations, and that the recreational and ecologic values and public enjoyment of the area are thereby enhanced, there is hereby established the Hells Canyon Recreation Area.”

### **Sawtooth National Recreation Area**

The Sawtooth National Recreation Area's (SNRA) 756,000 acres are part of the Sawtooth National Forest in Idaho. The SNRA was established by Congress in 1972 "... in order to assure the preservation and protection of the natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the recreational values associated therewith..." At the same time, the 217,000-acre Sawtooth Primitive Area was designated as the Sawtooth Wilderness.

## **Special Areas Designated Administratively**

Of all the special areas that are administratively designated, current interest to the public are the *special interest areas*. These types of special areas are designated to protect and manage for public use and enjoyment. They are areas with scenic, recreational, geological, botanical, zoological, paleontological, archaeological, or other special characteristics or unique values.

Selecting one of the above examples of special interest areas, a *recreational area* is a unit of land that has been administratively designated for particular recreation opportunities or activities such as hiking, rock hounding, recreational mining, photography, or other special activity.

Recreational areas are designated administratively, meaning this special area can be designated by the Regional Forester if less than 100,000 acres, and by the Secretary of Agriculture if greater than that. Local examples of administratively designated special areas range from the one-acre proposed Columbia Mountain Lookout archaeological special interest area on Colville National Forest to the 48,000-acre Teanaway recreational special interest area on the Okanogan-Wenatchee National Forest.

As can be seen from the description of a recreational area, the uses and activities allowed within the area are dependent on the desired condition for the area. The management emphasis of a recreational area would be for the kind of recreational opportunity provided by the area. Other uses, such as livestock grazing, are permitted in the areas to the extent that these uses are in harmony with the desired condition for which the area was designated. In the forest plan such special areas are assigned a unique set of management guidance that provides for the recreational opportunity and can constrain other uses through a set of guidelines.

## Management Areas

Besides special areas, a forest plan identifies separate areas similar to county or city zoning where a distinct set of management guidance is applied. These are called *management areas*. No set list of management areas exists as for special areas. Rather, management areas are defined and developed in a forest plan. Like special areas, management areas have desired conditions and guidelines specific to those areas. Unlike special areas, those desired conditions and guidelines are not specified by law, statute, or administrative direction. Management area guidance is developed by the particular national forest in response to social, ecological, and economic concerns and conditions.

National Forest System lands are generally suitable for a variety of uses such as outdoor recreation, viewing scenery, livestock grazing, timber production, fisheries and wildlife, cultural and heritage resource interpretation, and watershed purposes. Management areas arrange these various uses across the forest in varying levels of intensity. Management areas tend to encompass large areas (50,000 acres plus) of a Forest and often cross Ranger District boundaries.

## Conclusion

Areas not designated for wilderness may be managed to achieve a wide variety of desired conditions. The desired conditions may be framed using a special area or a management area designation. The time and effort to designate areas varies by who has authority to designate an area and the process. Past experience shows that the process to designate special areas through Congress (wilderness or national recreation areas) or by the Secretary of Agriculture (large recreation special interest areas) generally takes longer than those areas designated by the responsible official (Regional Forester or the Forest Supervisor). All special areas, whether a one-acre special interest area or a very large wilderness area, come with a set of rules on how they are managed. The rules and their flexibility vary with the type of special area.



**Special Areas - designating official and guidance cross-reference**

| <b>Special Areas</b>  | <b>Designation Authority</b>  | <b>Additional Guidance Location</b> |
|---|---|-------------------------------------|
| <b>Statutorily Designated Areas</b>                                   |   |                                     |
| National Monument   | Responsible Official recommends<br>Presidential Executive order or<br>Congressional act designates        | FSM 2371                            |
| National Recreation Area  | Responsible Official recommends<br>Congressional act designates   | FSM 2371                            |
| National Scenic Area  | Responsible Official recommends<br>Congressional act designates   | FSM 2371                            |
| National Trails<br>National Scenic Trails<br>National Historic Trails | Responsible Official recommends<br>Congressional act designates   | FSM 2353.4                          |
| Wild and Scenic River   | Responsible Official recommends<br>Congressional act designates   | FSM 1924 & 2354<br>FSH 1909.12      |
| Wilderness, or<br>Wilderness Study Areas                              | Responsible Official recommends<br>Congressional act designates   | FSM 1923 & 2320<br>FSH 2409.19      |
| Highway Systems, Interstate and<br>National                           | Congressional act established process<br>Secretary of the Department of<br>Transportation approves        | 23 CFR part 470                     |
| <b>Responsible Official Designated Areas</b>                          |   |                                     |
| Botanical Area  | Responsible Official Designates   | FSM 2372                            |
| Geological Area   | Responsible Official Designates   | FSM 2372                            |
| <b>Administratively Designated Areas</b>                              |   |                                     |
| Experimental Forest or Range  | Responsible Official recommends with<br>concurrence of Station Director<br>Chief designates               | FSM 4062                            |
| National Natural Landmark<br>National Historic Landmark               | Responsible Official recommends<br>Secretary of Interior designates                                       | FSM 2373<br>FSM 2363.1              |
| Recreation Areas  | Responsible Official recommends<br>Secretary of Agriculture designates                                    | 36 CFR 294.1<br>FSM 2360            |
| Research Natural Area   | Responsible Official recommends<br>Regional Forester designates, with<br>concurrence of Station Directors | FSM 4063                            |
| Scenic Byway - Forest Service   | Responsible Official recommends<br>Chief designates   | None                                |
| Scenic Byway - National   | Responsible Official recommends<br>Federal Highway Administration<br>designates                           | None                                |
| Significant Caves<br>National Recreation Trails                       | Responsible Official recommends<br>Regional Forester designates   | 36 CFR part 290<br>FSM 2353.4       |