



Our mission: "To protect and promote human-powered winter recreation in the backcountry of the Gunnison Valley"

October 20, 2017

GMUG National Forest
gmugforestplan@fs.fed.us

Dear Plan Revision Team:

Silent Tracks is a 501c3 nonprofit organization in the Gunnison Valley. Our mission is to "protect and promote human-powered winter recreation in the backcountry of the Gunnison Valley". On behalf of human-powered recreationists and our members, Silent Tracks appreciates the opportunity to comment on the Forest Plan proposal.

We acknowledge the Forest Plan illustrates priorities and broad goals that will guide site-specific actions and projects and does not include a trail-by-trail micro management of our forest lands; however, we do think it is appropriate for the Forest Service to take into consideration the increase in *all* recreational users on our public lands, particularly over-the-snow winter recreation.

Quiet users deserve the opportunity to have recreational experiences that are not impacted by motorized users. Winter use in non-motorized areas is especially limited for human-powered recreationists, since access to most of the existing wilderness areas is far beyond their reach from winter trailheads. The constant interruption by motorized vehicles significantly impacts the quiet experience human-powered users seek and enjoy.

GUNNISON PUBLIC LANDS INITIATIVE (GPLI)

We agree with most of the Gunnison Public Lands Initiative (GPLI) proposed designations and changes; however, we strongly disagree with the following text from the document:

1. "*Protects quiet use in areas with high ecological value*". Silent Tracks believes this is ambiguous and a bit disingenuous.
2. The GPLI Proposal also states that it "*Does not close any roads or trails that are currently open, existing trail uses would remain essentially the same*". The GMUG will be addressing over-the-snow winter recreation in the next few years and the above statement could limit the Forest Service in managing ever-increasing number of winter recreationists.

In addition to protecting areas for quiet use and human-powered recreation, Silent Tracks supports all the GPLI proposed areas for wilderness designation including additions and extensions. We also respectfully submit the following specific comments.

Cement Creek Area

East Cement Wilderness

The GMUG National Forest currently has 556,641 acres of designated wilderness or about 17% of the forest. It also has significant unprotected and undeveloped acreage that may be suitable for additional protection through the forest planning process. There are numerous areas on the GMUG that have garnered wilderness recommendations from the public and the Forest Service

in the recent past. These include lands that possess outstanding ecological, aesthetic or scenic qualities and remain pristine in character.

In addition to what GPLI has proposed for the Cement Creek Area, Silent Tracks advocates for a stand-alone wilderness comprised of the Granite Basin/West Cement Mountain area and East Cement Mountain area. We note and support that the current proposal states that the East Cement Mountain area is to be considered for Wilderness. Our position is that the East Cement Mountain area has complete wilderness attributes and should be proposed as wilderness as stated in the proposal. The Granite Basin/West Cement Mountain area is similarly pristine with only one lightly used bike trail which utilizes Eccher Gulch. The trail is designated as a dead-end trail with no exit and currently has no legal routing through the portion closest to Highway 135. The current exit of Eccher Gulch by mechanized users is not sanctioned by easement or the USFS.

Silent Tracks would like to see Granite Basin/West Cement Mountain designated as wilderness. We recognize that Trail 553 is currently designated for motorized travel. We would prefer that the trail be incorporated into the wilderness area or that the trail be designated as not more than mechanized, to reduce impacts to wildlife and to enhance a quiet experience. We understand that if Trail 553 remains motorized or becomes mechanized only, a corridor of appropriate width must be established on either side of Trail 553.

In addition to enhancing wildlife habitat and providing for quiet users such as hikers, designating the Granite Basin/West Cement Mountain area as wilderness will create a unique amenity in the upper Gunnison Valley; wilderness adjacent to residential areas. A new study conducted by Clarkson University and released in 2016 shows that private properties located near or adjacent to public lands with wilderness properties enjoy significantly higher property values. Specifically, the study found that properties within 0.5 to 6 miles of wilderness are valued at up to a 25 percent premium (*New Study: Wilderness Helps Adirondack Economy (2016)*). <https://www.adirondackcouncil.org/page/in-the-news-36/news/new-study-wilderness-helps-adirondack-economy-829.html>)

Designating the Granite Basin/West Cement Mountain Area as wilderness would make the wilderness experience readily available to residents and visitors alike. Access could be obtained across from the CDOT facilities on Highway 135. With cooperation from the state, a trailhead with parking could be established. Wilderness designation at such a location in the upper valley would be a truly unique amenity.

Granite Basin Special Management Area

Silent Tracks prefers wilderness designation for this area. Please see rationale above.

Double Top Special Management Area

Silent Tracks supports the GPLI proposal for SMA designation. Potential concerns of landowners along Cement Creek Road should be recognized. These include noise pollution, dust pollution and abatement, and speed limit enforcement to preclude more accidents and fatalities on the road. Safety concerns for walkers, joggers and bikers along Cement Creek Road are growing each year. There have been two rollover accidents in 2017 with one fatality. Efforts

should be made to reduce winter and summer motorized noise as much as possible. The entire Cement Creek drainage is becoming a loud and frenetic area of motorized traffic during the summer and, at this time, to a lesser degree, winter. It is difficult to recreate in the drainage as a quiet user without being subjected to motorized noise. There are many quiet users who originate from CB South and adjacent residential areas and currently have no option when in the drainage than to endure motorized noise and many vehicles traveling at speeds exceeding the 20-mph speed limit. As use increases in the future, lack of provision for quiet users will make matters worse. GPLI should recommend that law enforcement patrol and enforce the 20-mph speed limit.

Star Peak Wilderness

Silent Tracks supports the GPLI proposal for wilderness designation. The Friends Hut is located in the proposed area and is a popular destination for human-powered winter recreationists seeking quiet and solitude.

Crested Butte Area

Deer Creek Special Management and Wilderness Addition

Silent Tracks supports the GPLI proposal for wilderness to the north and SMA designation to the south of Deer Creek Trail.

Rocky Mountain Biological Laboratory Special Management Area

Silent Tracks supports the recommendations of GPLI, especially the need to protect the long term success of the Rocky Mountain Biological Laboratory and the recommendation that this area be designated as a scientific research-focused SMA. This proposal would also allow for existing and proposed non-motorized recreation, as well as ranching. The need for accurate boundary designations is mandatory.

Poverty Gulch Special Management Area and Wilderness Addition

Silent Tracks supports the GPLI proposal for the wilderness extension south of Baxter Gulch. Silent Tracks supports balanced winter use for the proposed SMA designation. Human-powered users should have equal representation with motorized, mechanized and hybrid users throughout the decision making process. A number of landowners in Pittsburg have expressed concerns to us regarding trespassing and increased motorized use in the area in the past few years. Specific concerns include trespassing and use of the private property where the road crosses Poverty Creek as a “staging area” for summer and winter motorized use.

Respectfully,

Silent Tracks Board of Directors

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