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Subject: Response to Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806

To: USFS GMUG planning personnel

From: Luke R Tembrock

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**Introduction**

I am writing to give comment regarding the GMUG forest plan revision #51806 such that my comments regarding resource management in the area under question are included in public record.

I was born and grew up adjacent to the GMUG specifically 1045 3100 Rd, Hotchkiss CO. We raised apples on our land and as such benefited from one of the most important resources coming from surrounding public lands – irrigation water. I currently live in Fort Collins, CO but my parents and numerous friends still live in the area. As such I travel back to the North Fork area and the Western Slope on a regular basis to visit my friends and recreate on the beautiful public lands in the area. I hope to return to the North Fork as a permanent resident and therefore I see my comments as directly affecting the place I will one day live.

In recent years I have helped advocate along with other interested citizens of the North Fork for better mtn bike trails to help develop a stronger recreation economy. This advocacy was amplified when the coal mines in the area began to close and a need for a diversified economy became apparent. I do not have any specialized education associated with recreation economics aside from my direct engagement with the activities I enjoy most – mountain biking and skiing as well as backpacking rafting, fishing, botanizing, hunting (animals and fungi) and rock climbing. From my perspective I have seen these activities when properly managed by federal agencies, participants, and local governments salvage former mining camps such as Moab and Crested Butte into world class communities for recreation. The upper North Fork of the Gunnison has an immense capacity to host a vibrant recreation economy but without cooperation and development from federal agencies, recreation groups, and local governments the benefits will largely be unrealized.

In addition to my interest in seeing a thriving recreation economy develop I work as a research scientist at Colorado State University where I study the impact of invasive species to crop systems as well as how human activities impact the genetic diversity of both cultivated and wild plant species. As such my comments will also reflect my professional perspectives in regards to how resource management could impact the biological and agricultural systems in the area being considered for GMUG forest plan revision #51806.

All of my specific comments regarding the forest plan will be focused on the north Fork of the Gunnison area as that is the area that I know best. However in general I favor a forest plan revision that focuses on strategies that are ecologically and economically sustainable in the long term.

**Comments for GMUG**

***Wilderness Areas***

The wilderness areas contained within the GMUG are vitally important to the surrounding communities and their management has been generally very good. The minor exceptions to this is the lack of or abandonment of trail maintenance in the hardest to get to areas (e.g. trail 853 down cliff creek, or 441 over castle pass) and more importantly the degradation (e.g. trash, vegetation damage, multiple fire rings, fire wood cutting, etc.) of backcountry campsites by large groups. Outreach to local volunteer groups and increased staffing are possible solutions to this problem. I generally support and have worked with the GPLI (Gunnison Public Lands Initiative) in their efforts to preserve lands with wilderness character however in some areas SMAs (special management areas) would be appropriate such that mtn biking and other non-motorized activities can be preserved where they were historically allowed.

***Biology and Ecology***

Numerous issues related to the biology and ecology of the area require ongoing attention. Some issues I have observed personally and/or been made aware of are invasive species, landscape level changes (e.g. sudden aspen decline), and changes in biodiversity. The main efforts I would like to see around these areas are active eradication and monitoring of invasive species (especially in backcountry areas), mitigation efforts where possible to reduce the scale of landscape level changes, and robust and continuous scientific surveys throughout the GMUG to document biodiversity. I know that the GMUG has been very much understudied in regard to biological diversity so I would like to see a more active outreach from GMUG land managers to partner with scientific institutions to complete this work.

***River and Water Resources***

The rivers in the GMUG area are largely left to run wild with few large dam projects. Yet numerous diversion are employed to irrigate the arid valleys below. As such active monitoring and management will become even more important as the demands for water grow with increased population. Management practices that preserve the wild character and prevent reduced water quality should be prioritized throughout the GMUG forest areas.

***Winter Snow Sports***

The GMUG area has an abundant resource in regards to snow sports with much of that resource being remote backcountry style as few ski areas are present in the area under consideration. In the North Fork area few easy access opportunities exist for non-motorized cross country or backcountry skiing. Most areas with easy access are dominated by snowmobile travel. One possible area that I would like to see considered for non-motorized (except possibly grooming machines) cross country skiing is the Watson flats area between Anthracite and Snowshoe creeks west of Marcelina Mtn. I believe this area is open to snowmobiles now but it would be nice to have the 1.5 square mile area reserved for cross country skiing and winter fat biking only. As of now there are no easy access areas in the North Fork open to cross country skiing only. Additionally, in my experience, backcountry non-motorized areas are regularly being accessed by snowmobiles. I would like to see greater efforts being made in regards to education and enforcement to keep the remote backcountry areas motor free. I suspect the problem of motorized incursion will only get worse with the growing popularity of timber sleds.

***Resource Extraction***

Resource extraction activities such as coal mining and natural gas drilling on the GMUG forests should be limited as these activities compromise the natural beauty and more importantly have a large impact on wildlife and ecological processes, and provide only temporary economic gain. Areas in which resource activities have taken place must be more thoroughly rehabilitated. Examples of insufficient rehabilitation are the drainages to the south of the West Elk coal mine. Many roads and well pads were cut into his area but because they were not sufficiently blocked they remain in use by motorized travelers. Stricter enforcement and better rehabilitation practices should be employed to amend impacted areas such as the Minnesota creek drainage and areas where future extraction takes place.

***Mountain Biking***

Many areas have been successfully developed for mtn biking in the GMUG (e.g. Crested Butte) with successful outcomes for the communities and the environment. The North Fork area centered on Paonia has many existing trails for mtn biking however issue of access and maintenance have left these areas largely underutilized not only by mtn bikers but all non-motorized user groups. A collaboration between USFS, the NFTAG (North Fork trail advocacy group) and COPMOBA (Colorado Plateau Mountain Bike Trail Association) has in the last two years begun to address the maintenance backlog but more help is needed to maintain and improve these trails. Generally better access and connectivity are needed for these trails while the importance of maintaining a backcountry experience is essential. Thus single track trails that are currently non-motorized need to remain that way. I support designating these areas as SMAs as this will retain the wilderness character of the area but allow access to bicycles. Specific trails are discussed below in their own sections.

*Raggeds trail*

Raggeds trail 820 is currently one of the best mtn bike trails on USFS lands in the North Fork drainage. A current plan to build a connector between Carbondale and Crested Butte would use this trail to connect existing and new segments of trail. In addition a possible connection to Paonia from this trail is in a conceptual stage. The raggeds trail suffers from the same problem that many non-motorized trails in the area suffer from – poor access, unconnected to other trails, and lack of maintenance. We have made great strides on maintenance in the last two years but there are numerous areas in which the tread is heavily eroded and needs to be rerouted or rebuilt. I am hoping that we (COPMOBA, NFTAG) can continue to work with the USFS to remedy these problem areas. In regards to access and routing I would like to see the 746 trail to the north of 820 used to connect McClure Pass to the 820 trailhead to create a more straightforward/enjoyable access from the north. For the southern half of the 820 it traverses an OHV route which is badly eroded and poorly graded for mtn bike thus I would like to see a singletrack reroute of the southern half of the 820 onto BLM lands ending at the Paonia reservoir dam/crystal meadows area. This change would make the raggeds trail a much more desirable and easy to access route for mtn bikers. Such a route could have a major economic benefit to the area like that of the monarch crest route on the border of the San Isabel and Gunnison Forests. Beyond the 820 one of the conceptual plans connecting the CB to Carbondale route to Paonia would climb from crystal meadows to raven mesa and west to Paonia connecting with the Jumbo mtn trail system.

*Mendicant ridge trails*

The trails on mendicant ridge are excellent singletrack rides that would be amazing rides if greater maintenance was given to them. Therefore, I would like to see the Dyer creek trail 888 and Piburn trail 880 remain open for non-motorized travel including mtn bikes. Mendicant ridge trail 884 has been officially abandoned but would also be an amazing ride if properly marked, routed and maintained – it too should remain open to mtn bikes. Along with remaining open I would like to see greater efforts put into maintaining these trails from the forest service (volunteer groups would contribute as well).

*Interocean trails*

The trail across interocean pass is an excellent singletrack ride that would be amazing if greater maintenance was given to it. Therefore, I would like to see the interocean trail 890 remain open for non-motorized travel including mtn bikes. Along with remaining open I would like to see greater efforts put into maintaining these trails from the forest service (volunteer groups would contribute as well).

*Other areas*

I support and want the forest service to approve the Gunnison to Crested Butte trail being planned by Crested Butte Mountain Bike Association and Gunnison Trails. Trail 840 from horse ranch park to the junction with trail 842 and trail 842 to Lost Lake should remain open for mtn bikes to provide a single track connection to Paonia and Carbondale so that new trail does not have to be constructed in that area.