



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

December 6, 2017

GMUG National Forest
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Dear Plan Revision Team:

Silent Tracks is a non profit 501c3 whose mission is "To protect and promote human-powered winter recreation in the backcountry of the Gunnison Valley".

Silent Tracks appreciates the opportunity to respond to the questions you asked in the Assessment Report: "Are we on track with the information assembled? Did we capture what's going well and what's not going well on the GMUG, or are we missing any critical pieces? And most importantly, does the potential need for change reflect the major issues that we should concentrate on in plan revision?"

Are we on track with the information assembled?

It is surprising, and disappointing, that the Draft Recreation Assessment Report gives very little coverage to the largest user group in the GMUG...the quiet recreational user. Walking, hiking, backpacking, and picnicking make up the four most popular outdoor recreation activities, with fishing ranking a close fifth. See attached. (*Table 1: Recreation Activity Participation as Reported in the 2014 National Visitor Use Monitoring Report for the GMUG.*)

There certainly appears to be a bias toward motorized use. It is disturbing that this Draft Recreation Assessment actually quotes from a study done by the Colorado Off-Highway Vehicle Coalition. "According to one recent study, motorized recreation contributed \$914 million in direct sales in Colorado during the 2014-2015 season, including \$70 million in state and local business taxes. (Colorado Off-Highway Vehicle Coalition, 2016). We found no mention of the economic benefits of mechanized and/or quiet-use recreation mentioned in the Draft Recreation Assessment.

We also call your attention to The Draft Forest Plan Assessments; Recreation, PDF page 11, under the heading "Trails" which states; "Additional motorized loops and trails

are desired by the public." While it may be true that some of the public have this sentiment, the inclusion of such a conclusive statement is inaccurate. It can just as well be stated that other groups of the public do not want additional motorized loops and trails. Without qualification or quantification of the statement currently in the assessment, the statement is clearly misleading and/or egregiously wrong. "Table 1: Recreation Activity Participation as Reported in the 2014 National Visitor Use Monitoring Report for the GMUG" clearly shows that motorized use is a much smaller component of activity than non-motorized activities. It stands to reason that the portion of the public that might desire more motorized loops and trails is certainly a very small percentage of the total recreationists. Please provide clarification of the statement as currently written or delete it. To leave the statement intact as written, without clarification indicates data that is highly questionable unless supported with objective metrics.

Silent Tracks was pleased the report reflected that the area around Crested Butte and Taylor River/Taylor Park is among the most highly used on the Forest. Management of recreation opportunities and impacts is likely to be needed in the coming years. Designated dispersed campsites or more developed campgrounds may be needed in heavily used areas such as the Slate River and Washington Gulch drainages outside of Crested Butte. The inclusion of maps would be helpful in spatially depicting the areas of the GMUG that are of special interest to various users.

Under the Recreational Opportunity Spectrum (ROS), we agree the Forest Plan strategic direction for recreation settings needs to be updated. The physical, social and managerial settings are all important components of the recreation settings. We agree that changes to the technology and type of motor vehicles are also affecting the recreation setting.

Did we capture what's going well and what's not going well on the GMUG, or are we missing any critical pieces?

The Draft Recreation Assessment Report captures the conflicts between different user groups (mountain bikers, motorized users, equestrians, hikers, etc.) as well as the need to address the inadequacy and poorly managed dispersed campsites, trailhead congestion and maintenance. Silent Tracks agrees with the assessment that, as population increases on the Front Range, other areas of Colorado, and neighboring states, the GMUG has become an increasingly popular recreation destination, especially for dispersed activities. In addition, as motorized use in neighboring National Forests is restricted or limited due to increased population pressure or other issues, users migrate to the GMUG.

In the final Assessment Report, please address the conflicts occurring for over-the-snow recreationists. As stated in the Draft Assessment, the expanding technology related to over-snow vehicles is advancing the capabilities and extending the range of snowmobiles. These advances have resulted in crossover machines that go faster, are more comfortable, and are capable of traveling further into previously unreachable off-trail backcountry areas. Hybrid snowmobile/backcountry skiing adventures are

becoming more popular. The use of fat tire bikes in winter recreation is also growing in popularity throughout the state, including areas of the GMUG.

The report states: “Snowmobiles are another source of conflict in the motorized and non-motorized recreation debate, particularly on the Grand Mesa, in the Crested Butte/Kebler Pass area of the Gunnison RD, and on the Uncompahgre Plateau.” Silent Tracks would like the final report to include all the winter trailheads around Crested Butte. Conflicts occur not only on Kebler, but also in the Slate River, Washington Gulch and Cement Creek drainages. Safety concerns are the primary issue. Also, “sharing” of a trail implies that multiple users have equal opportunity for enjoyment. Silent Tracks agrees that management for this type of use needs to evolve in order to catch up with the popularity and technology involved in both motorized and non-motorized over-snow travel.

Silent Tracks has provided grant funds it received from the Community Foundation of the Gunnison Valley and the Town of Crested Butte along with matching funds to Western State Colorado University (WSCU) to sponsor an independent winter recreation study, the data collection initiative (DCI). This unbiased data collection initiative is being conducted by the Masters of Environmental Management (MEM) Program at WSCU. The pilot project began in the winter of 2016-17 and included the Slate River drainage. In the winter of 2017-18, the graduate students will be monitoring and recording visitation numbers, user types, and trailhead conditions at the six (6) primary trailheads in the Upper Gunnison Valley (UGV). This will be accomplished by the use of infrared and motion triggered cameras that are located at the tightest pinch point of each trailhead. The DCI is in its second season and Silent Tracks will continue to apply for grants and provide matching funds for this initiative in future years so that our community, local government and public land agencies can use this data in planning efforts. The data collected through the DCI should be considered throughout the Forest Plan revision process.

Does the potential need for change reflect the major issues that we should concentrate on in plan revision?

One important issue we hope the Forest Service will include in the Forest Plan is the recognition that the development of more and more trails (for all users) may be harmful to the environment, the wildlife and the fragmentation of public lands.

Additional Comments

Colorado was the fourth fastest growing state in the nation (U.S. Census Bureau 1990 and U.S. Census Bureau 2017). More importantly, between 1990 and 2016 Gunnison County grew by 60 percent and Gunnison County residents identified connection to nature as one of their core community values. The numbers of public lands recreational users reflect this population increase. Under ‘Recreation’ the report states: “Recreation use is increasing and changes in technology are opening up new ways to

recreate. Along with the increasing use, impacts from that use are affecting the land as never before and there is growing competition for preferred places to recreate.” Silent Tracks couldn’t agree more with this assessment and we belong to the segment of users that believe “conflict is already occurring and needs to be addressed” and that, while education is critical, education alone is not the answer to alleviate the increased user conflict both summer *and* winter. We strongly support the need for forest-wide direction and the adoption of a comprehensive winter travel management plan which is way past due.

Thank you for the opportunity to comment.