December 7, 2017

We were both born in Colorado and have been avid outdoor enthusiasts [hiking/backpacking, mountain biking, hunting, fishing; skiing (Nordic, backcountry and downhill), and rock climbing] since the 1960’s. We have been full time residents of Gunnison County since 1994 and our professional background expertise includes hydrogeology, botany, and secondary education. We have seen tremendous changes in the GMUG and other forests and applaud the FS for undertaking this monumental task. We respectfully submit the following comments on the Draft Recreation Assessment (DRA) for the GMUG.

First, the comment period to respond to the DRA and other Draft Assessment documents is too short. A thirty day time frame which includes the Thanksgiving holidays is too brief for the public to respond. Please consider extending the comment period. Public comments are essential and necessary to make informed decisions.

While the discussion and descriptions on recreation are useful, spatially depicted maps using GIS data should be presented if possible. GIS data from projects such as the MTB Project, Mountain Project, TrailForks, American Whitewater’s National Whitewater Inventory, and the Outdoor Alliance recreation GIS repository could be used to minimize the gaps in the GMUG map data.

The inventory of recreation assets is incomplete and does not fully assess the importance of dispersed recreation. Numerous renowned recreation destinations are recognized and located within the GMUG. Additional data relating to the importance of these areas to users and local communities should be provided. Consider future generations when making these decisions – will they have “wild” places to explore and enjoy? A relatively new field, ecotherapy, reveals getting out in nature has positive effects on mental and physical health. The value of quiet places is hard to quantify, but is grossly underrepresented in the DRA. Quiet places matter! Life without forests and quiet places would be unimaginable.

Outdoor recreation makes a significant contribution to the local community year–round. Additional information and data should be collected by local Chambers of Commerce, USFS and others agencies and organizations to more fairly represent the economic importance of recreation. Facts and current data are needed to make unbiased and informed decisions. Outdoor Alliance, a national nonprofit, notes the following: 1) outdoor recreation contributes $28 billion dollars in direct spending and supports 220 thousand jobs in Colorado; 2) the trail systems in Mesa County alone generates $12.5 million in economic activity in the county and 3) In The Benefits to People report’s estimate of recreation activity generating a combined $32.2 million in labor income across all the forests woefully under represents the economic importance of recreation to the local communities.

The DRA states (page 3) “Front country trails are desired by the public.” What is the definition of front country? Shorter trails should be designed to connect to backcountry trails to allow longer ventures.

On page 5, the DRA notes increased motorized and ATV/UTV use concerns in several areas. The greatly increased ATV/UTV use and environmental degradation in the upper Gothic/Washington Gulch and Slate River corridors in recent years should be added as areas of concern.

On page 7, “Private land within the forest boundary is being developed, which results in changes to the setting.” Increased development of private land has impacts year round, including snowmobile access in areas not previously allowed such as the Gothic corridor. This is exacerbated by the desire to reach outlying areas in winter and summer by landowners and others.

As noted on page 7, “Winter ROS was not determined in the 1983 Forest Plan”. Winter ROS should be included in the new Forest Plan. In addition, the existing winter travel management plan (WTMP) for the GMUG is outdated and does not cover the entire forest. Although a document and a map exist for Winter Recreation in the Crested Butte Area, designations are vague and confusing and essentially not enforceable. Furthermore, the number and types of winter recreationists has increased dramatically since 1995. The WTMP needs to be updated to reflect current causes and effects of increased use: alpine touring equipment, avalanche safety equipment and information, hybrid skiers/boarders; fat bikes, improved technology that allows motorized vehicles to access once distant destinations [snowmobiles with more float and power, snow bikes (conversion motorcycles), tracks for 4x4 vehicles, etc.]

The Western State Colorado University (WSCU) Master in Environmental Management (MEM) program conducted a winter use study in 2016-17 known as the Data Collection Initiative (DCI). This study was funded in part by a grant from the Community Foundation of the Gunnison Valley (CFGV) and other matching funds. The pilot project collected observational data from the Slate River drainage. Graduate students used infrared sensors and made onsite observations, as well as conducted on online survey to collect data on the number of users, types of users and made trailhead observations. In 2017-18, the MEM students will continue to collect similar data at six drainages in the Crested Butte area. The 2017-18 season effort will be funded in part by a grant from the Town of Crested Butte and other matching funds. The FS should include the DCI data collected in the pilot project and beyond in the Forest Plan, as well as coordinate with the MEM program students to collect any other pertinent data. The DCI should be expanded to include more trailheads and drainages in the future. Information on the DCI and pilot project results can be obtained from Dr. Melanie Armstrong at WSCU.

The DRA notes on page 11, “Specific trailheads that may need new facilities include the Kebler Pass winter trailhead and the Judd Falls/Copper Creek trailhead.” Other trailheads needing improvements include winter trailheads in Slate River, Washington Gulch, and Cement Creek.

As noted in the DRA on page 14, “Management actions on neighboring Forests, such as more tightly -restricted dispersed camping and motorized recreation opportunities, also plays a role in this increase”. As adjacent areas get more regulated and overwhelmed, there will be additional increases in GMUG users. These numbers should be considered along with projected population increases.

On page 15 the DRA states, “Outside of Wilderness, mountain biking and motorized recreation are dominant activities.” What is the rationale for this statement? This statement contradicts the non-mechanized and non-motorized user data presented in the DRA (Table 17). In addition, the 2013 Statewide Comprehensive Outdoor Recreation Plan (SCORP) Outdoor Recreation Participation Public Survey cited in the DRA states, “walking, hiking/backpacking and picnicking make up the three most popular recreation activities, as calculated by total outdoor activity days in each one of the regions (page 3). Furthermore, the Gunnison Crested Butte Tourism Authority conducted a survey from May 2016 through September 4, 2017 that asked respondents to choose two activities. The summertime activities survey revealed 50% came to the area for summer Hiking/Backpacking. The winter survey revealed the non-motorized activities accounted for a combined 27% of all users (12% backcountry skiers, 9% Nordic skiers and 6% snowshoers), compared to 3% for fat biking and 9% for snowmobiling.

According to Table 17 of the DRA and Table 13 of the 2014 NVUM, the third largest user group in the GMUG is non-motorized users. Motorized users and mechanized users (mountain bikers) are well represented by organized groups year-round (CBMBA, IMBA, Snotrackers, GOATS, etc.). There are no comparable organized groups for non-mechanized, non-motorized users represented in the DRA and other documents. These users also do not have fair representation in local community committees and organizations. For example, the Gunnison Public Lands Initiative (GPLI) is working on documents that could affect decisions on the Forest Plan and future winter travel management planning, but unlike mechanized and motorized users, hikers, cross-country skiers, snowshoers and other “quiet” users are not specifically represented on the steering committee. While organizations like the Wilderness Society and others represent many issues of concern to hikers and quiet users, these users do not have equal representation at the table with motorized and mechanized users and are, therefore, highly under-represented.

The DRA (page 26) mentions the development of hybrid snowmobile/skiers/boarders and other technology that have increased winter use especially in certain areas. Are hybrid users considered motorized users or non-motorized users? Will updated NVUM or statewide studies be conducted for inclusion of the newly evolving user types in the Forest Plan analysis? New studies should include fat biking, hybrid skier/boarder, new technology, helipad proposal at Irwin, etc. Will provisions be established that allow for interim decisions to be made as uses change with adequate options for public comment.

As noted in the DRA on page 38, 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. Additional areas of concern in the Crested Butte area should include the Slate River, Washington Gulch. Brush Creek, and Cement Creek drainages.

Human-powered quiet users near population centers typically share trailheads with motorized and mechanized users. Human powered recreationists are physically limited to traveling shorter distances from trailheads in daily outings. Consideration should be given to maximize the experience for all users, especially to “close in” destinations near multi-use trailheads. Winter and summer issues need to be considered separately for these trailheads. For example, in recent years technology advances in winter motorized vehicles allows snowmobiles to climb steeper terrain (as noted in the DRA), the new machines “float” on the snow, have more power and allow easier access to both close in and distant destinations. This reduces the quality of experience for non-motorized users who can only access close in destinations and increases the potential for conflict on nearby peaks (for example Red Lady/Mt Emmons) that have historically only been accessible by non-motorized winter users.

Multiple use trails do have increased potential for conflict, as stated in the DRA page 38. Creative conflict resolution solutions including education, cooperation between user groups, adopting guidelines from successful programs implemented in other forests, separation of user types, etc. should be considered to enhance the enjoyment of all users. Stakeholders from all user types, motorized, non-motorized, and human powered quiet users should have equal representation in the decision making process.

On page 45, the topic related to the length of summer/winter data and effects of climate change needs to consider studies on how dust storms affect early melting of the snowpack. This is especially important since snowpack is the source of drinking water and the increasing population will require more drinking water. Additionally, early snow melt could result in increased forest fire risks.

While wilderness areas are currently closed to mechanized and motorized uses currently, there has be legislation proposed to change use to allow mechanized use in wilderness areas. If the regulations change, what is GMUG position? Use of wilderness areas for cross-country skiing and snowshoeing in winter in many cases, is not possible due to access and should be acknowledged when considering over snow uses.

Sadly, population pressures and associated increasing use of the GMUG requires increasing regulation and enforcement. However, without improved enforcement, the proposed changes are essentially meaningless. Funding mechanisms for weekday AND especially weekend enforcement should be developed. Volunteers, coordination with other agencies and groups or any other option should be considered. Complementary to enforcement is improved education, collaboration and cooperation with user groups, and well defined updated maps. Increased pressure on Congress to appropriate more funds for operations, maintenance and facilities should be encouraged.

Thank you for the opportunity to submit comments.

Joe and Cathy Frank