

December 8th, 2017

Grand Mesa, Uncompahgre and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

Re: GMUG Forest Plan Revision Draft Assessment Reports Comments

Dear Plan Revision Team,

Thank you for your consideration of these joint comments from Outdoor Alliance and Outdoor Alliance Colorado regarding the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision draft Assessment Reports (#51806). Outdoor Alliance is a coalition of nine 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, the Colorado Mountain 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, the 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 National Forests 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. We share an interest in how recreation resources are managed on the GMUG National Forests and hope that we can be a valuable partner for the Forest Service throughout the plan revision process.

With this letter we hope to help the GMUG National Forests catalog some of the important dispersed recreational resources and issues on the forests. The recreational significance of the GMUG forests for outdoor recreation is difficult to overstate, and we greatly appreciate the planning team’s attention to these important issues. While we offer a number of critiques of the Assessment report below, we want to underscore that our intention is to offer useful information and input to the planning team, and we look forward to continue working with the Forest Service to develop the best possible forest plans for the GMUG forests. We applaud the work the GMUG Planning Team has done on the draft assessment reports and offer the following for your consideration:



1. The Grand Mesa, Uncompahgre, and Gunnison National Forests comprise 3,161,900 acres of scenic and high value public lands, and Outdoor Alliance and Outdoor Alliance Colorado recognize that managing multiple uses across a landscape this large, is challenging. We appreciate the Forests willingness to solicit, and integrate feedback from users that are intimately familiar with these forest lands and waters - particularly as dispersed recreation is a primary use. We look forward to working with the Team to evaluate and address the need for changes to the 1983 Plan.

2. *The GMUG Assessment is moving too quickly to gather high quality public input*

The Assessment is the foundation for the entire Forest Plan revision process. The draft reports were released two weeks before the Thanksgiving Holiday and it is unclear if either staff or stakeholders are going to be able to engage in a meaningful way with a 30-day comment period shortened by the holidays.

In light of the importance of the Assessment phase of the Forest Plan revision for developing the informational base for the planning effort, as well as the Thanksgiving holiday schedule and the unusually large number of stakeholders interested in and affected by the GMUG Forest Plan revision, Outdoor Alliance formally requested a 45-day extension of the deadline for submitting comments on the draft Assessment, which was denied.

Because the GMUG National Forests are such highly valued resources for outdoor recreation – with substantial population centers within close proximity and a high volume of quality recreational resources – high quality public input is essential for the GMUG Forest Plan Assessment. Outdoor recreation organizations are keen to assist in facilitating outreach to the recreation community, and additional time—particularly given that Thanksgiving week fell in the middle of the current comment - would have allowed for more substantive public engagement. Timelines should not take precedence over thorough public engagement.

3. *Maps and Spatial Recreation Data Needed*

Describing recreational resources with a high level of specificity is essential because of the strong connection with specific places formed by outdoor recreationists, particularly with regard to the type of premier resources found on the GMUG. Activities like climbing, whitewater paddling, backcountry skiing, and mountain biking do not occur at random throughout the Forests, but rather at highly specific locations to which visitors often travel for hundreds or thousands of miles and form strong emotional attachments. We believe that carefully accounting for these places of recreational significance is an essential step in protecting and enhancing recreation opportunities, minimizing conflicts, ensuring the sustainability of uses, and efficiently allocating Forest Service resources.

- **The Recreation report is missing maps and spatial data.** Comprehensive data on dispersed recreation trends does not appear to be included in this assessment. To adequately assess recreation resources in the GMUG, recreation must be depicted spatially – using maps and GIS data – not just through narratives, anecdotes, and descriptions as found in the report. Many advanced spatial resources are available from the recreation community such as MTB Project, Mountain Project, TrailForks, and American Whitewater’s National Whitewater Inventory (see



appendix A) . Outdoor Alliance provided the planning team its own extensive set of recreation GIS data on September 15th, but this data does not appear to be included in the draft Recreation report.

- **The existing ROS maps are missing.** We were dismayed to read that the forest was “unable to locate a complete set of maps” for the existing ROS, but we request that any data that is available will be digitized and made available to the public as soon as possible. The GMUG must develop comprehensive maps and make this information available to the public as it progresses with planning.
- **Outdoor Alliance’s request for the underlying data used for the report was never fulfilled.** A request for the geospatial data used to create the Draft Assessment Reports should not create extra work for the Forest Service and is important for stakeholders during review of the Assessment reports. For example, the system trails data hosted on the FSGeodata is available, but it only contains the centerline basic attributes. The data does not contain the “Allowed Terra Use” and “Snow Use” attributes, which were used to Table 9 in the Recreation report. Thus stakeholders are left to guess what the report’s numbers are based upon. We will continue to request data used in subsequent analyses.

4. Dispersed Recreation is Under-represented

In order to ensure that the GMUG continues to provide high quality recreation opportunities, and to protect the forest’s unique environment and natural resources in the face of increasing visitation, it’s essential that the revised forest plan fully integrate sustainable recreation management into all other aspects of forest management. The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.¹ To meet this requirement the GMUG revised plan must include sustainable recreation plan components, including standards and guidelines (not just desired conditions) that are integrated with plan components related to other uses.

- **The report correctly captures the need to increase both the variety and amount of recreation of settings and opportunities.** We applaud Forest Service for recognizing the need to prioritize human-powered outdoor recreation. The Cordell report² citing the growth of “Nature-based recreation” and emphasizes the need to make accommodating the growing and changing recreational user community, in both summer and winter, a higher priority in the Recreation report’s Proposed Need for Change.
- **Adaptive management tools for new uses should be in the Recreation Report Proposed Need for Change.** Outdoor Alliance appreciates and agrees with the statement in the Recreation report which sites the increase of new recreational uses, including fat tire bikes, e-bikes, drones, split-boards, Packrafts (pg 4), and believe that it should be incorporated in the Preliminary Need for Change.

¹ 36 C.F.R. § 219.10(a)

²



- **The full scope and importance of current human powered recreation is not fully captured in the Recreation report.** Some of the most iconic recreation destinations in the country are located within the GMUG. The description of outdoor recreation resources in the report is not commensurate with importance of these areas to users and local communities – and represents a critical information gap. Activities that take place off-trail, such as rock climbing, backcountry skiing and boating are hardly mentioned in the Recreation Assessment, yet the GMUG is home to world-class opportunities and frequented by locals and visitors seeking these types of recreation. The report itself correctly acknowledges that dispersed recreation is the primary mode of recreation within these forests. Furthermore, both rock climbing and undeveloped skiing are among the top five activities expected to grow in popularity over the next 50 years, according to the 2012 Cordell report³ cited in the recreation assessment.
- **Rafting and kayaking are under-represented in the Recreation report.** In the Recreation report, there is no data on rafting/kayaking participation (pg 31). Only 3% participation in boating including non-motorized (pg 16), yet rafting is largest outfitter activity in forest (pg 21). This discrepancy could be the difference between motorized and non-motorized craft and needs to be clarified in the report. Guiding operations, and presumably general paddling, is increasing on the Taylor River but no other rivers were assessed. The inventory needs to be broadened – please see list of whitewater resources in *Attachment A – Whitewater paddling attributes on the GMUG*.
- **Winter recreation is under-represented in the Recreation report.** The overall scope of winter recreation activities in the GMUG has not been captured. Specifically, Winter recreation is under-represented as a common use in the Gunnison, San Juan Geographic, Red Mountain Pass and Ophir areas. Outdoor Alliance’s geodatabase should be used to assess the full extent of winter recreation. Additionally increasing winter recreation and associated parking limitations near trailheads was identified as a concern by the public. Please consider how parking and accessibility affect the number and type of users in a given area.
- **The description of dispersed recreation opportunities by geographic area seems heavily weighted towards motorized use.** Motorized uses are frequently listed as one of the most common activities in each area and yet, according to 2014 visitor use data, it accounts for only 20% of overall summer use.
- **The Outdoor Alliance geodatabase should be used to fill the Recreation report gaps.** As highlighted above, Outdoor Alliance provided a full set of outdoor recreation GIS data layers to the planning team on September 15, 2017. This geodatabase maps the specific locations where human-powered outdoor recreation takes place on the GMUG and is one of the most comprehensive datasets of its kind. This spatial data should be used to address the gaps in the

³ cordell



forests' dispersed recreation data.

- **An inventory of dispersed camping “hotspots” needed.** Although high-use dispersed camping was indicated as a concern with regards to resource degradation and sanitation issues, no data was presented to quantify the current impacts across the forest. We recommend a more complete inventory of dispersed camping “hotspots” to include number of campsites and fire-rings, square feet of soil compaction, etc. This data will allow the GMUG to more accurately assess the impacts of this recreational use and implement forest-wide direction and adaptive management techniques to control this growing use. We believe extending the comment period for the Assessment report would be an effective means of at least partially addressing this data gap.
- **Snow, or fresh powder, should be considered as a recreational resource in need of management.** There is a finite amount of prime terrain for winter recreation and the resource can be degraded (tracked-out) with over-use. A snowmobiler can “consume” the resource much faster than a skier or snowshoer so it is important to note that the carrying capacity of 1 acre of terrain is far higher for non-motorized users but may be quickly exceeded with just one motorized user.
- **The system trails maintenance backlog needs to be prioritized.** We agree with the report’s assessment that “to remain safe, sustainable and usable and to minimize environmental effects, trails need regular maintenance” (pg 35). While the maintenance needs for developed recreation and dispersed camping sites are highlighted, the trails maintenance backlog is not identified as a key issue to address in the Proposed Need for Change. If there is demand for increased trail-based recreation opportunities (both motorized and non-motorized) there will be an increased maintenance burden on the forest which needs to be incorporated into all levels of planning.
- **The Recreation Assessment over-emphasizes conflict between recreation users, while ignoring potential other impacts on recreation.** Effective planning requires integrating the various subject matters addressed in the forest plan. Right now, recreation appears to be in a silo, with the Assessment focused largely on user conflicts among recreationists without consideration of the impacts on recreation from other areas like fire or extractive uses.
- **The Recreation report’s statements regarding mountain biker conflict need substantiation.** “Conflicts among mountain bikers and other users have increased over time” (pg 18) is a blanket statement not supported by data and not helpful for planning. This should be struck from the report unless they can be substantiated with actual data that can be analyzed and acted upon. Similarly the statement, “Mountain bikers have trended toward high adrenaline experiences with speed and thrills, which are incompatible with hikers or other non-motorized users due to safety” (pg 36) is unsubstantiated. It is true that many outdoor sports have users which seek challenge, including mountain biking. Those experiences should be managed with separate use and directional trails, where appropriate, to accommodate that use safely. Mountain bikers also



seek the same solitude and beauty, sought by other users such as hikers, found in backcountry and “wild” settings. This bicycling desire for tranquil settings is reflected in the growing bikepacking and adventure cycling segments of the sport. The Recreation report inaccurately describes mountain bikers monolithically as “thrill” seekers, which is not helpful for understanding and managing this growing recreational use.

- **There are six fourteeners in the GMUG.** Uncompahgre, Wetterhorn, Castle, San Luis, Mount Sneffles, and Wilson peaks are located on the GUMG and correctly listed in the Report, but the description states five rather than six in the Recreation report (pg 2).

5. NVUM data is unlikely to accurately reflect recreational use

Just as a high degree of geographic specificity is required in the documentation of recreational resources, efficient allocation of resources requires careful documentation of levels and patterns of use in a more specific and accurate fashion than is possible through the National Visitor Use Monitoring program. Outdoor Alliance believes that the NVUM program has only limited utility because of its dated methodology, and an over reliance on NVUM data without supplementation from other sources is unlikely to meet the Planning Rule’s mandate of employing the best available science and existing sources of data.

- **Stratified random samples do not adequately capture human-powered activities.** NVUM survey sites are selected “using a stratified random sample of the times and locations where recreational visitors can be counted.” However, the places that people choose to recreate, particularly for activities like climbing, kayaking, mountain biking, and skiing and snowshoeing are not distributed across Forest Service sites such that a random sampling is likely to capture them. Outdoor recreationists seek out particular experiences that can only be found in specific locations, and without weighting the site selection process to ensure that these desired locations are included, the sample will result in an underrepresentation of these activities.
- **Data sampling at NVUM sites occurs on randomly selected days without adequately taking into account the variables that make any particular day optimal for a particular activity.** NVUM sampling is unlikely to produce accurate data on many types of recreational use because it fails to account for variables like whether a river is at the appropriate water level for paddling or whether a trail is too muddy to ride. Many higher elevation whitewater runs, for example, may only be at appropriate levels for river running for as little as a few days during each season’s runoff, but nevertheless offer highly prized experiences for whitewater kayakers for which boaters literally travel from all over the world.
- **The Outdoor Industry Association’s reports provide more detailed information on outdoor recreation participation.** We applaud the planning team for including the OIA outdoor participation studies, which include detailed information on participation, the demographics of outdoor recreation, and substantially more detailed consideration of the various forms of each



outdoor recreation activity than is provided by NVUM.⁴ While these surveys cannot provide improved geographic granularity in comparison with NVUM, they do provide an incremental improvement by offering greater specificity on the varieties of outdoor recreation activity. Planners should also continue to actively engage the recreation community in developing this data, and Outdoor Alliance is prepared to assist in this effort. Finally, planners should specifically note the limited nature of existing use data so that these needs can be addressed in the planning and monitoring phases.

6. Recreation Opportunity Spectrum

The 2012 Planning Rule requires that Forest Service use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes. Revised plans “must include plan components, including standards or guidelines, to provide for sustainable recreation,” including “[s]pecific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.”⁵ We agree with the Recreation report’s conclusion that the ROS should “manage toward those desired conditions for recreation” rather than be a “by-product of other management activities” (pg 51), but believe the ROS alone is not sufficient to manage recreation on the GMUG.

- **Recreation Opportunity Spectrum (ROS) does not capture the nuances of human-powered recreation opportunities.** While the Recreation Opportunity Spectrum (ROS) can be an incredibly useful tool for integrating recreation management with other aspects of forest management, particularly as a shorthand for the level of development in a given area, it is not always the best tool for describing recreational resources and opportunities within a given area. For climbers, mountain bikers, kayakers, backcountry skiers, and myriad other active outdoor recreationists, the level of development of a given area is only one attribute among many that combine to make an area a draw for recreational activities. Other attributes like the difficulty and quality of a trail, a river’s whitewater, a climbing area’s rock, or a skiing zone’s topography and snow, are just as important or more so to outdoor recreationists as levels of development (at least to a point) and are better accounted for through detailed spatial information. Additionally, while most active outdoor recreational users prefer sites in the most pristine possible condition and would not like to see areas degraded by increased development, it is important to note that high - quality recreation experiences are found in a diversity of settings as described by the ROS.
- **Recreation focused management areas needed.** The limitations of the ROS as it relates to human-powered recreation underscores the importance of developing recreation focused management and geographic areas such as those described in the Forest Plan Revision for the Colville, and the Okanogan-Wenatchee National Forests’ *Briefing: Special Areas and*

⁴ Outdoor Foundation, Outdoor Participation Report 2013, *available at* <http://www.outdoorindustry.org/images/researchfiles/ParticipationStudy2013.pdf?193>

⁵ FSH 1909.12, ch. 20, § 23.23a(2)(g)



*Management Areas.*⁶ Also consider 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.

- **Winter ROS is important going forward.** The Forest Service uses the Recreation Opportunity Spectrum to depict the level of development and opportunities for solitude available on the Forests. This varies considerably during the winter when many roads are closed or impassable. The Forest Service should commit to developing a separate, winter-specific ROS framework. Although some small geographic areas within the GMUG have made discrete winter travel management decisions with the appropriate level of public input, it is inaccurate to say that any part of the forest has “completed over-snow motorized travel planning” (pg 49) or imply that these winter recreation plans would have an overarching influence on forest planning in the Grand Mesa, Uncompahgre or Crested Butte Areas. The entire GMUG will need to undergo more rigorous and comprehensive Winter Travel Management planning after the forest plan is complete in order to comply with subpart C. We agree with the need to complete a Winter ROS inventory and encourage the forest to also conduct a comprehensive Over-Snow Vehicle Suitability analysis during this forest plan revision process.

7. Outdoor recreation’s significant contribution to local communities is undervalued in the Benefits to People report

The GMUG National Forests contain some of Colorado’s most iconic outdoor recreation destinations. People from Colorado and around the world visit the Forests and adjacent communities, including Crested Butte, Gunnison, Grand Junction, Montrose, Ouray, and Telluride to hike, mountain bike, climb, ski and paddle in the GMUG’s remote and beautiful landscapes. In turn, these visitors generate spending and jobs which are essential to the economies of the neighboring communities.

- **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.⁷ 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.⁸ These figures should be included in the Assessment and be used to frame the importance of outdoor recreation to local communities.

⁶ United States Forest Service, Forest Plan Revision for the Colville, and the Okanogan-Wenatchee National Forests August 2008, Briefing: Special Areas and Management Areas, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053046.pdf

⁷ Colorado College, *Conservation in the West Poll* (2015).

⁸ Outdoor Industry Association, *Colorado's Outdoor Recreation Economy Report*, <https://outdoorindustry.org/state/colorado>, (2017).



- **The economic impact of outdoor recreation is under-counted in the Benefits to People report.** Three trails system in the Grand Valley – Tabeguache, North Fruita Desert, and Kokopelli – in alone generate \$12.5 million in economic activity for Mesa County.⁹ The 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 Nantahala and Pisgah National Forests economic impact study underscores the importance of human-powered recreation.** While not specific to the GMUG, in Western North Carolina the Nantahala and Pisgah National Forests generate \$115 million in annual spending on paddling, climbing, and mountain biking. In Western North Carolina the Nantahala and Pisgah National Forests generate \$115 million in annual spending on paddling, climbing, and mountain biking.¹⁰

Conclusion

Outdoor Alliance hopes that this letter and the attachments will help the GMUG better understand human-powered recreation on the forests. We hope that this information will assist the Forest Service as it moves forward in the forest plan revision process. Outdoor Alliance and Outdoor Alliance Colorado are committed to working as a resource for the planning team, and we look forward to continuing to work with planners to secure the best possible forest plans for the GMUG forests.

We would like to follow up on this letter with an in-person meeting to dive further into the GMUG’s existing, and potential, recreational landscape and will be in touch with Samantha Staley to set up a time to meet.

In the meantime, please do not hesitate to contact us with any questions. Outdoor Alliance and Outdoor Alliance Colorado look forward to being an involved and valuable partner in the forest plan revision process.

Best Regards,



Jason Bertolacci



Louis Geltman

⁹ Colorado Mesa University, 2018, this paper is currently unpublished

¹⁰ Nantahala-Pisgah Economic Reports, Outdoor Alliance, 2017, <http://www.outdooralliance.org/nantahalapisgah-economic-reports/>



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Attachment A – Whitewater paddling attributes on the GMUG

Anthracite Creek, Ruby Fork

01. Bridge to Erikson Springs Campground

<https://www.americanwhitewater.org/content/River/detail/id/3097/>

Daisy Creek

01. 40' Waterfall to confluence with Slate River

<https://www.americanwhitewater.org/content/River/detail/id/3378/>

East

01. Gothic Bridge to above Stupid Falls

<https://www.americanwhitewater.org/content/River/detail/id/3379/>

Oh Be Joyful Creek

01. Ankle Breaker to Beaver Ponds

<https://www.americanwhitewater.org/content/River/detail/id/3375/>

Slate

01. Beaver Ponds to Oh Be Joyful CG

<https://www.americanwhitewater.org/content/River/detail/id/3377/>

Taylor River Canyon

01. Taylor Park Reservoir to Almont

<https://www.americanwhitewater.org/content/River/detail/id/428/>

Uncompahgre River

01. Uncompahgre Gorge

<https://www.americanwhitewater.org/content/River/detail/id/5769/>

Yule Creek

01. Headwaters Run

<https://www.americanwhitewater.org/content/River/detail/id/4105/>

Yule Creek

02. Bible Camp to Crystal River

<https://www.americanwhitewater.org/content/River/detail/id/4384/>

