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

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May 30, 2018

GMUG National Forest  
gmugforestplan@fs.fed.us

Dear Forest Plan Revision Team,

Silent Tracks appreciates the opportunity to comment on the Scoping documents for the GMUG Forest Plan Revision. Silent Tracks is a nonprofit 501(c)3 organization whose mission is "To protect and promote human-powered recreation in the backcountry of the Gunnison Valley".

The following comments (black text) are submitted in direct response to the GMUG Scoping document (red italicized text).

*Part I: Forest Plan Vision, Roles and Contributions*

*A. Public Enjoyment*

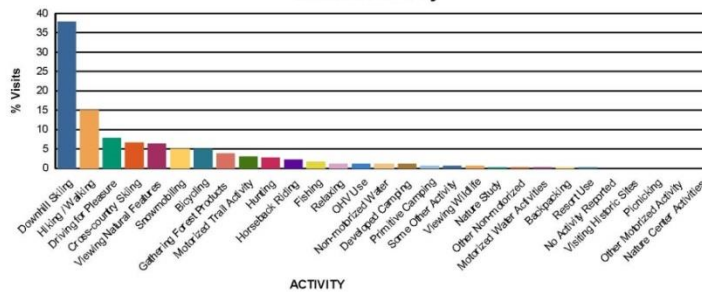
*The GMUG provides year-round recreation opportunities for rapidly increasing populations of Western Slope communities, and attracts visitors from the region and around the world. Recreation settings range from highly developed ski resorts to Jeep trails to primitive wilderness, and attractions include world-renowned destinations such as Telluride and Crested Butte, six Scenic and Historic Byways, five 14,000+ foot peaks, and the Continental Divide National Scenic Trail, among others. Locals and visitors to the GMUG enjoy high-quality hiking and trail running; fishing; motorized recreation; camping; mountain biking; rafting and kayaking; hunting; scenic driving; viewing wildlife and wildflowers; cross-country, back-country, and downhill skiing; snow-boarding; snowmobiling; and other forms of recreation.*

Comment: The protection of access to public lands and balanced use for all types of managed recreation in the GMUG should be a high priority. As noted in the US Forest Services documents (*2014 National Visitor Use Monitoring Report for the GMUG, Table 13, page 20, see below*), non-mechanized, non-motorized users collectively represent the second highest percentage of GMUG users (downhill skiing is the highest percentage). This diverse group of recreationists should be fairly represented throughout the Forest Planning process. Planning decisions should ensure future generations have access to natural environments and extensive public lands to recreate and enjoy.

Activity Participation

Activity	% Participation*	% Main Activity†	Avg Hours Doing Main Activity
Downhill Skiing	38.4	37.7	5.0
Viewing Natural Features	25.6	6.2	2.9
Hiking / Walking	25.5	14.8	3.3
Viewing Wildlife	18.1	0.5	1.8
Relaxing	15.1	1.0	5.8
Driving for Pleasure	13.6	7.6	6.0
Cross-country Skiing	8.0	6.5	2.7
Snowmobiling	7.9	4.9	4.6
Picnicking	6.0	0.0	2.8
Bicycling	5.6	4.8	2.6
Motorized Trail Activity	5.4	2.9	5.8
Gathering Forest Products	4.6	3.8	1.8
Primitive Camping	3.7	0.5	18.7
Fishing	3.5	1.7	8.9
Visiting Historic Sites	3.3	0.0	8.0
OHV Use	3.2	1.0	7.4
Nature Study	3.0	0.3	2.0
Hunting	2.8	2.8	6.7
Developed Camping	2.8	0.9	21.0
Horseback Riding	2.2	2.2	3.4
Nature Center Activities	1.5	0.0	0.0
Some Other Activity	1.2	0.5	7.2
Non-motorized Water	1.0	0.9	2.5
Resort Use	0.7	0.1	12.7
Other Non-motorized	0.3	0.2	3.5
Motorized Water Activities	0.3	0.1	4.0
Other Motorized Activity	0.1	0.0	0.0
No Activity Reported	0.0	0.0	
Backpacking	0.0	0.1	14.6

% Main Activity



Source: 2014 National Visitor Use Monitoring Report for the GMUG

\*Survey respondents could select multiple activities so this column may total more than 100%.

†Survey respondents were asked to select just one of their activities as their main reason for the forest visit. Some respondents selected more than one, so this column may total more than 100%

The increasing number of people recreating on public lands demonstrates the value of the GMUG as a source of enjoyment. However, noise and gas fumes from motorized users, in the winter and summer, can significantly impair the enjoyment of quiet users who seek a tranquil outdoor experience. If current trends continue, the unsustainable increased volume of people in the backcountry and the resulting overcrowding and overuse will negatively impact the enjoyment of all users (motorized, hybrid, non-motorized and mechanized), particularly in winter when access to public lands is limited. Recently, summer overcrowding and resource impacts have occurred throughout the GMUG, notably in the Gothic Corridor, which has resulted in new rules and restrictions for open camping.

**B. Commodity Use and Community Connections**

*The GMUG's outstanding scenery and recreation opportunities generate tourism, an important industry and a major economic contributor to local communities. The beauty and accessibility of the landscape also contributes to the desirability of the area for new residents and the growth of second home development.*

Comment: Access to GMUG's extensive public lands is often the driving force that prompts people to visit and/or move to surrounding areas. Recreating in these places allows people to connect with nature, find solitude, and enjoy positive mental and physical health benefits (Sandifer et al. 2015). They also provide a sense of escape that has been shown to improve moods, reduce fatigue, provide options for physical activity and social interactions (Abrahams et al. 2010), resulting in a sense of well-being (Clark et al. 2014). These public lands are threatened by overuse as technology and the numbers and types of users increase; thus, sustainable outdoor recreation management is essential.

Winter (including alpine touring, split boarding, telemarking, cross-country skiing, snowshoeing, winter mountaineering, snowmobiling, etc. ) and summer recreation use (hiking, mountain biking, ATV/motor biking, backpacking/camping, fishing, rafting, etc.) is growing in popularity on the GMUG and directly supports many local businesses including gear shops, guide services, and other business owners. Promoting sustainable, recreation-based jobs that attract young and diverse residents is the key to the western slope of Colorado's economic future.

**Part II: Key Needs for Change**

**A. Provide Strategic, Adaptive Direction**

*Provide more strategic, adaptive direction than the often prescriptive, tactical direction in the current Forest Plan. Adaptive direction should provide for greater durability.*

*Develop a monitoring plan that meaningfully informs implementation of the adaptive components of the Revised Forest Plan. Effectiveness monitoring should be repeatable, focus on landscape-level changes and utilize remote sensing technology as much as practicable.*

Comment: A more adaptive direction is the best way to address ever evolving changes in technology and increasing numbers and types of recreation users, especially since the Forest Plan revision process is complicated and only occurs every 20 years or so. Ongoing monitoring and forest-wide data collection should be pursued for effective management.

Silent Tracks has provided grant funds it received from the Community Foundation of the Gunnison Valley (CFGV) and the Town of Crested Butte, along with matching funds from private donors and other organizations, to the Western State Colorado University (WSCU) Masters of Environmental Management (MEM) Program to sponsor an independent winter recreation study, aka the data collection initiative (DCI). The pilot

project began in the winter of 2016-17 and included the Slate River drainage. In the winter of 2017-18, the methodology was expanded and refined to utilize more infrared sensors and to include motion-triggered cameras to record visitation numbers, user types, and trailhead conditions at six primary trailheads in the Crested Butte area. The DCI just completed its second consecutive season of data collection. This year's data and analysis results were presented by Doug Shaw (lead investigator) as part of his master's thesis in the first week of May 2018. A copy of the report will be provided when it is available later in May 2018. We are hopeful that the DCI will continue to be an ongoing program and that data collected through the DCI and other similar programs will be considered throughout the Forest Plan revision process and beyond. The DCI methodology and format could be extended to other trailheads and conducted year-round.

Online surveys could also be used to collect pertinent data. For example, trailhead parking/congestion, sense of crowdedness at trailheads, noise/pollution, and pet and human waste at trailheads in the Crested Butte area were reported as the most important issues that detracted from the quality of experience by the 313 participants in an online survey conducted by the DCI in 2017 (Brian Lieberman, lead investigator, 2017).

***B. Contribute to Social and Economic Sustainability***

*Provide people and communities with a range of social and economic benefits for present and future generations. These benefits include water, timber production, range, recreation, energy resources, and additional multiple uses.*

*The recreational value and use of the GMUG has increased over the years. In many areas, recreation is a driver and should be a major consideration when Forest Plan desired conditions are developed.*

*Recreation use of campgrounds and other developed sites has increased, many facilities are in need of maintenance and/or reconstruction, and budgets have declined. The revised plan needs updated direction to sustainably manage existing facilities within agency budgetary constraints, and direction to prioritize new facilities with available funding.*

Comment: Strong standards and guidelines must be an integral part of the revised Forest Plan and adequate funding must be provided for maintenance and enforcement. In spite of year-round increases in the number of and types of users in the GMUG backcountry, the federal budget for recreation spending in 2017 dropped by nearly 20 percent from 2011. Ongoing budget shortfalls negatively affect the sustainability and quality of experience in the GMUG and threaten long-term resource degradation. Efforts should be made to increase the budget for GMUG in the future, so this unique resource will remain a special and unique place for current and future generations.

Consider expanding volunteer based outreach/education programs for visitors to the GMUG, in order to sustain outdoor recreation and its economic benefits, and to protect resources and maintain high quality experiences. Maintain and expand informational

brochures, trailhead signage, and educational programs such as the “Leave No Trace” and Mountain Manners (Peak Protectors) format with its trailhead outreach to inform visitors about protecting natural resources, trail etiquette, camping guidelines (put out campfires, camp in existing areas, etc.), know the rules, don’t litter, etc.

*Increased dispersed camping in hot spots on the Forests has resulted in increased use conflict with adjacent landowners, recreation, and resource impacts. Identify triggers/thresholds of impacts in order to direct different camping management tools (designating sites, closing sites, etc.).*

Comment: Provisions for periodic modification to the Forest Plan to reflect changing conditions are needed. These stipulations should provide adequate time for public comment and review. Statewide and local population growth and the unanticipated influx of users from recreation closures on other nearby public lands areas should be considered in long-term projected use calculations.

*Consider a landscape-scale strategy to provide adequate motorized recreation opportunities as well as acceptable levels of noise heard within non-motorized areas.*

Comment: Based on the 2014 National Visitor Use Monitoring Report for the GMUG, hiking/walking, cross-country skiing, mountain biking, and other non-motorized activities are very popular activities in the GMUG. The strategy should provide high quality recreation opportunities specific to non-motorized/non-mechanized, and mechanized users as well as motorized. Noise, safety, impacts to wildlife and resources, and other issues should be considered when developing a landscape-scale strategy for recreation.

A strategy which encompasses balanced recreational opportunities for all users (motorized, non-motorized, and mechanized) should be adopted. A well-defined interpretation of what ‘acceptable levels of noise heard within non-motorized areas’ means is needed. Many of our 300 members/supporters have often complained that, when hiking, cross-country skiing, running/walking, etc. in the backcountry, it is almost impossible to have a ‘quiet’ experience. While hikers/walkers/backpackers are able to access and find solitude in wilderness areas, “wilderness” is not to be managed for the purpose of recreation. In addition, most of these areas are not accessible from winter trailheads. Therefore, a proportion of non-wilderness areas should be specifically designated for ‘quiet users’, as done in other nearby forests. Since quiet users are the largest proportion of recreational users, non-wilderness areas should be managed to ensure a proportional opportunity for quiet recreation.

*Consider updated direction for the existing Gothic Research Natural Area to better facilitate ecological research.*

Comment: Scientific research should be strongly supported. The natural environment and historical nature and use of the Gothic area should be preserved to the greatest extent possible.

**C. Provide for Ecological Sustainability**

*Consider direction that takes into account a changing climate, including adaptive responses to impacts of climate change (i.e., more frequent and larger disturbance events). The focus should be on maintaining ecosystem resiliency in order to continue to provide multiple uses and ecosystem services.*

Comment: Climate change and development in desert ecosystems located to the south and west of the GMUG have contributed to “dust events” in the winter and spring that result in the snowpack melting earlier in the spring.

Projected climate trends for winters in the GMUG are to be warmer and drier. If those predictions manifest and technological developments and recreation use trends continue upward, more people will be competing for the same limited backcountry areas, especially in the winter. If multiple use is the ultimate goal as stated above, it should be balanced multiple use where all stakeholders are fairly represented and have the opportunity to actively participate in the development of creative management options that reduce conflicts between motorized and non-motorized users. Efforts should be made to minimize impacts to sensitive snowscapes and winter habitats.

*Consider direction to ensure that forest air quality resources are not degraded as a result of future air pollution from atmospheric pollutant deposition or critical load exceedances.*

Comment: See previous comment on “dust events”.

**D. Maintain the Diversity of Plant and Animal Communities**

*Provide direction to maintain existing, relatively unfragmented big game habitat and associated hunting opportunities, and other wildlife habitat, in the context of increasing pressure from development, including recreational trails.*

Comment: Maintaining and preserving unfragmented big game habitat, especially the critical wildlife habitat, elk calving areas and elk migration routes through the Whetstone and Flat Top areas between Crested Butte and Gunnison is strongly recommended.

*Provide direction to maintain GMUG ecosystems that are particularly rare within the broader landscape, including cottonwood riparian and fen ecosystems.*

Comment: Consider direction to maintain and protect vulnerable, high altitude, alpine ecosystems.

**E. Integrate Resource Management to Multiple Uses and Ecosystem Services**

*The Recreation Opportunity Spectrum (ROS) should be used to better integrate resource management. Consider use of backcountry areas to support wildlife habitat objectives, in addition to semi-primitive recreation experiences.*

*Address areas with high conflict between public recreation/access and private lands.*

**F. Incorporate Best Available Science, Update to Existing Law and Policy**

*Provide direction that reflects the best available science and management approaches, and yet remains durable and relevant through time in our rapidly changing environment.*

Comment: The Forest Plan should support utilizing best available science and pertinent data, such as the ongoing WSCU Master in Environmental Management Data Collection Initiative (DCI)'s use of infrared cameras and online surveys to monitor trailhead users and conditions. Consideration should be given to ensuring public lands access to future generations. The Forest Plan should maintain and preserve the existing legal protections provided by wilderness designations.

Quiet Places Matter! The Forest Plan should consider recent scientific studies on the effects of noise on humans and wildlife. Ecotherapy, coined by Howard Clinebell in 1996, is a growing field where health providers are prescribing people spend time in natural environments and benefit from regenerative powers, improved mood, and reduced anxiety, depression and stress levels (<https://www.webmd.com/balance/features/nature-therapy-ecotherapy#2>). Recent studies by George MacKerron (University of Sussex) used a geo-location app, [Mappiness](#), to record data from more than 65,000 individuals that provided insights and evidence on the link between the natural environment and wellbeing. The new book *The Nature Fix* by Florence Williams delves into completely new research and uncovers the powers of the natural world to improve health, promote reflection and innovation, and ultimately strengthen our relationships

*Consider improved methods of monitoring resource impacts related to recreation (especially dispersed camping), replacing the outdated Frissell Condition Class method in the 1983 Plan.*

Comment: Year-round data collection including use of infrared sensors, on site observations, and user surveys would be useful and informative.

**G Build an Accessible, Useful Plan**

Comment: A plan is only useful and effective if it can be enforced. Adequate resources and budgets must be provided for enforcement and sustainability.

### ***Part III. Management Area Framework***

**A. Natural Processes Dominate**

**B. Special Areas and Unique Landscapes**

**C. Backcountry, including non-upper tier Colorado Roadless Areas**

*Recreation is more primitive/semiprimitive, and there are opportunities for both motorized and nonmotorized recreation.*

**D. Recreation Focus Areas/High-Use Recreation Emphasis**

*Overall management emphasis is on providing a high-quality recreation opportunity for a moderate/high volume of users. Some locations may be suitable for timber production with*

*adequate controls for impacts to scenery. Timber harvest for other purposes may occur throughout. Vegetation management emphasis would be for public safety and scenery management.*

Comment: A “high-quality recreation opportunity” should be provided for hikers/walkers and other quiet use recreationists to enjoy public lands without the intrusion of noise and gas fumes. Safety is also an issue for hikers and other human-powered users with regard to motorized vehicles both in summer and winter. Conflicts between motorized and non-motorized users have historically existed throughout the GMUG and all forests. As the backcountry becomes busier, the potential for conflicts increases.

The Gothic corridor from Mt. Crested Butte to the Townsite of Gothic was designated as a winter non-motorized area by the Gang of Nine and Environmental Assessment over 20 years ago. In the past two years, Gunnison County has reviewed an application for increased winter snowmobile use (RMBL) and has approved winter snowmobile grooming for fat bikes (CBMBA). The Gothic corridor, the only designated “non-motorized” drainage in the winter in the Crested Butte area mandated by these governing documents, is one of many places in the GMUG where the quality of experience for quiet users has decreased. If these trends continue, future generations will not have access to increasingly important and rare quiet places.

#### **E. General Forest/Active Management**

*The Forests are actively managed for a variety of multiple uses and management objectives. Suitable for timber production. Motorized and nonmotorized recreation opportunities are distributed throughout. Includes the wildland urban interface/frontcountry areas of the Forests and extends to the edge of backcountry areas.*

Comment: Although the GMUG National Forest offers a wide variety of recreation activities and opportunities, the demand is simply too great for the GMUG to be all things to all users. Recreation management, therefore, must focus resources on those recreation opportunities for which an area is best suited. We support maintaining areas where quiet use and solitude are of primary importance, and believe that the Forest Service should act to ensure quality recreational experiences for quiet users in those areas.



### **Revised Draft Assessment – Designated Areas (March 2018)**

*Page 43: The Gunnison Public Lands Initiative (GPLI) is a coalition of stakeholders that has released an initial proposal (November 2017) that recommends key public lands in Gunnison County with what they identified as exceptional recreation, wildlife, natural, grazing, scenic, scientific and water values be permanently protected through legislation as wilderness or special management areas on National Forest and BLM-managed public lands in Gunnison County (GPLI 2017). Their proposal also includes areas where the GPLI identifies the need for additional stakeholder collaboration to determine which designation is most suited for the resources and uses in particular areas. The proposal was designed to not close any roads or trails, essentially retain existing trail uses, allow for future trail projects in some areas through agency processes, does not affect snow riding areas, protects quiet uses in areas with high ecological value, ensures ranching operations and water uses can continue, and protects habitat for big game and Gunnison sage-grouse.*

Comment: GPLI summarily eliminated the two remaining primitive Recreation Opportunity Spectrum (ROS) areas (outside of wilderness) from wilderness consideration. As stated in the GPLI document, “Interests represented on the Working Group include ranching, water resources, motorized use, conservation, mountain biking, hunting and angling.” However, as noted in the *2014 National Visitor Use Monitoring Report for the GMUG*, respondents listed downhill skiing (37.7%) as their main activity, followed by hiking/walking (14.8), cross-country skiing (6.5%), viewing natural features (6.2%), bicycling (4.8%), motorized trail activity (2.9%), horseback riding (2.2%), and fishing (1.7%). Thus, a large percentage of respondents, non-motorized, non-mechanized users, i.e., hikers, cross-country skiers, and horseback riders and many other users were unfortunately not directly represented.

If the proposed GPLI recommendations are adopted by the Forest Service, please explain protocols for modifying the designations and management plans and how adopting this document will affect future actions, such as winter travel management and OSV regulations.

*Page 48: Incorporating aspects of the Wilderness Stewardship Performance effort in Forest Plan direction can assist with management of designated wilderness areas. In addition, consider a goal in the revised Forest Plan to bring each wilderness up to the minimum management standard set by the WSP.*

Comment: Utilize volunteers from stakeholder groups to be wilderness rangers and participate in the wilderness stewardship performance effort.

*Page 49: Consider the San Juan Mountain Wilderness and the Gunnison Public Lands Initiative proposals and work collaboratively with proponents through the process to evaluate wilderness potential and development of alternatives for wilderness and special management area recommendations.*

Comment: The scope of collaboration should consider the impact of GPLI’s decision to “retain existing trail uses” on its exclusion of wilderness as a potential protection in several areas in the Gunnison Basin, notably Granite Basin and Whetstone Mountain. Options

could be considered that allow existing trails to border potential wilderness area boundaries. Careful vetting should include each non-wilderness recommendation by qualified persons with extensive knowledge of all trails in the area, including hiking, horseback riding, and cross-country skiing. Also, there is concern about some previously submitted comments which promote alternative designations of wilderness. There are many natural areas that deserve the highest protection, wilderness designation. Not protecting these areas for the purpose of possible future trails would be unfortunate and short-sighted.

### **Revised Draft Assessment – Recreation (March 2018)**

*Page lxvi: Concerns about have been raised about trail opportunities. Motorized recreation enthusiasts are seeking a variety of improvements to their opportunities. Additional mileage of motorized trails, loop routes, additional trail width for UTVs and ATVs, and retention of challenge routes have been identified in some public comments. For non-motorized users, concerns about separating hikers from horse and from mountain biking have been raised. Winter recreation opportunities have been changing with advances in technology for both motorized and non-motorized forms of travel. Consider strategic direction to provide the desired opportunities and settings for the diverse types of dispersed recreation (motorized and non-motorized) on the GMUG.*

Comment: In spite of the 2014 National Visitor Use Monitoring Report for the GMUG, where hikers/walkers and other non-motorized, non-mechanized activities are collectively listed as a large percentage of primary activities, there are relatively few designated hiking only trails. It would be desirable to have some hiking only trails in non-wilderness areas with year round trailhead access near existing communities. Or perhaps consider creating separate/parallel trails in high use areas to reduce conflicts between user types; however, this would require more funding and would require careful consideration of potential negative impacts on resources.

The GMUG has extensive and well utilized trail systems for all users – hikers, mountain bikers, motorbikes, ATV/SUVs, etc. There are viable proposals and projections on maps for many more new trails in the years to come. Is there a point in the future where adding additional trails is no longer needed or sustainable and maintaining or refining (minor re-routes) existing trails becomes the goal? What legacy do we want to leave for future generations? Perhaps long-term strategic direction should also consider preserving natural areas without any trails for the benefit of wildlife and future generations.

*Page lxvii: Volunteers, Partnerships and Other Methods for Managing the Recreation Program Strategic direction to find alternative means of managing the recreation opportunities on the GMUG is needed. The current volunteer/partnership program and recent expansion of these efforts have proven to be beneficial. Developing strategies to continue this and create new ways of managing the forest are needed.*

Comment: See comments above regarding the Data Collection Initiative and volunteer/partnership opportunities with wilderness and other Forest Service programs.

Sincerely,

Silent Tracks Board

Maureen Hall

John Ellis

Cathy Frank

Bill Oliver

Michele Kearns