

Hello GMUG Planning Team,

Thank you for the opportunity to comment on the Forest Plan Revision Scoping including the final sections of assessment documents.

My comments are organized by subject with references to relevant GMUG Forest Plan Revision documents.

1. Electric Bikes

Reference 1-1

Grand Mesa, Uncompahgre, and Gunnison National Forests
REVISED DRAFT Forest Assessments: Recreation
March 2018
Chapter 5. Conditions Affecting Quality of Recreation Opportunities
Dispersed Recreation
Trail Use
Page xlx

“Electric bikes (e-bikes) are a recent technology. The agency currently considers e-bikes to be motorized vehicles and are restricted to roads and motorized trails. The e-biking community has concerns about this designation. E-bikes are generally quiet, which may change the sound impact and make them appropriate for a non-motorized setting in terms of noise.”

Scoping Comment 1-1:

Please consider adding “e-bikes are also generally non-polluting and may use renewable energy sources” to Reference 1-1.

Reference 1-2: Regulation by State of Colorado

Colorado House Bill 17-1151 was adopted by the state legislature in 2017 and defines Class 1 and Class 2 models of e-bikes as ‘bicycles’ instead of motorized vehicles

https://leg.colorado.gov/sites/default/files/documents/2017A/bills/2017a_1151_enr.pdf

Reference 1-3: Demand for Electric Mountain Bikes

“Demand for eMTBs has grown dramatically—nearly every major brand has an eMTB offering or is frantically working on one. Internal industry reports are predicting that within a few years a massive percentage of high end mountain bikes sold will be eMTBs. Especially in Europe. There will be significant consequences across our industry as bike manufacturers shift their investments from traditional mountain bikes to electric mountain bikes.”

<https://www.pinkbike.com/news/why-pinkbike-is-covering-emtbs-this-week.html>, Aug 21, 2017

Scoping Comment 1-2 on

Reference 1-1

Chapter 9. Potential Need for Change of the Forest Plan to Respond to Recreation Issues

Dispersed Recreation

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“Consider strategic direction to provide the desired opportunities and settings for the diverse types of dispersed recreation (motorized and non-motorized) on the GMUG.”

Given the decision by the State of Colorado to treat class 1 and class 2 e-bikes as “bicycles” (Reference 1-2) and the strong demand for electric mountain bikes (eMTBs) (Reference 1-3) GMUG should, as a **high priority**, develop strategic direction for allowing e-bike use on trails currently designated as non-motorized.

Consideration should be given to the:

- a) minimal environmental impacts of low power e-bikes,
- b) low noise impacts on other trail users,
- c) low pollution impacts on other trail users,
- d) benefits of enabling additional bicyclists to access backcountry trails (e.g., older bicyclists).

2. Value of Granite Basin Wilderness

The GMUG’s 2005 -2007 analyses of non-wilderness uses in Granite Basin was comprehensive.

For the Forest Plan revision the scope of these analyses for Granite Basin should be expanded to include the benefits of Wilderness. For example:

- a. Therapeutic effects of nature and solitude
- b. Close proximity of Granite Basin wilderness to population centers increases opportunity to experience nature and solitude
- c. Intergenerational equity provided to future generation by Wilderness
- d. Accessibility of Wilderness to aging residents
- e. Economic benefits of Wilderness attracting remote workers resulting in economic growth, diversity, and resilience

3. Designated Areas

Reference 3.1

Grand Mesa, Uncompahgre, and Gunnison National Forests

REVISED DRAFT Forest Assessments: Designated Areas

March 2018

Chapter 5. Potential Need and Opportunity for Additional Designated Areas

Are there other proposals for designated areas before Congress, in proposals from collaborative efforts or from previous plans?

Gunnison Public Lands Initiative

Page 43-44: “The [GPLI] 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, . . . “

Reference 3.2:

Letter dated June 1, 2018 to GMUG Planning Team from:

Gunnison Public Lands Initiative
Gunnison County Stockgrowers Association
Gunnison Trails
High Country Conservation Advocates
Gunnison County Sno-Trackers
Gunnison O.H.V. Alliance of Trailriders
Crested Butte Mountain Bike Association
Trout Unlimited
Backcountry Hunters and Anglers
The Wilderness Society
Upper Gunnison River Water Conservancy District

Page 1 “The Working Group is made of stakeholders from ten community groups, the Gunnison Board of County Commissioners, and Senator Michael Bennet’s office. **Interests represented on the Working Group include ranching, water resources, motorized recreation, conservation, mountain biking, hunting, and angling.**” [Emphasis added]

Scoping Comment 3-1 on

Chapter 6. Potential Need for Plan Changes to Respond to Designated Areas Issues
Designated Wilderness Areas

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.”

The scope of “GMUG working with proponents of the GPLI proposal” should include evaluating the effects of:

- a) The proposal design (Reference 3.1) to not close any road or trail, etc.
In the GPLI process an existing non-wilderness trail use precludes Wilderness. This process is directly contradictory to GMUG documented analysis approach used for Granite Basin in 2006.
- b) The limited representation described in Reference 3.2.
The GPLI working group **did not include** specifically named members representing the interests of **horseback riding, cross country skiing, or hiking**. Hiking, in particular, is a very popular activity of GMUG users. (For example, NVUM activity participation reports for GMUG show that there are far more hiking users than biking users.) GMUG should increase the scope of collaboration to include users whose interests were not represented in GPLI.

4. Alternatives

There is an area of GMUG land adjacent the 2007 recommended Granite Basin Wilderness that offers alternatives to the Granite Basin/Eccher Gulch mountain bike trail. These alternatives would improve on the current recreation experience. One such trail was planned by CBMBA. CBMBA’s web site described this trail as follows:

“CC 3d. Jack’s Cabin Downhill - CBMBA proposes a trail from the top of Roaring Judy Road to Jack’s Cabin Road. This trail would be a directional downhill only trail. The Jack’s Cabin area is south facing, in an area that does not receive as much snowfall and would, therefore, be accessible earlier in the mountain biking season. There is a call for downhill specific technical trails and this trail would fit that description.”

There are other alternative routes for a downhill trail that lie entirely outside of the 2007 GMUG Granite Basin Wilderness boundaries. All of these alternatives start from the top of Roaring Judy Road. All have excellent downhill mountain biking potential. They offer:

- 1,500 feet of net vertical elevation change;
- Loop potential;
- “Blank canvas” flow trail design to include banked turns, short uphill, berms, and jumps; and
- Parallel to the existing the Roaring Judy downhill trail with close proximity of tops of trails.

I request that coping for the Forest Plan revision should include at least 1 alternative which includes (a) Wilderness recommendation for Granite Basin and (b) one or more of the alternative downhill trails described above.

Thank you for considering my comments.

Bob Goettge
Crested Butte, CO