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GMUG National Forest

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Dear Forest Plan Revision Team,

Thank you for the opportunity to comment on the Scoping documents for the GMUG Forest Plan Revision.

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

*Public Enjoyment*

As stated, the GMUG public lands are indeed a vital source of economic stability for local communities and they provide diverse recreational opportunities for visitors and Western Slope residents. Continued enjoyment of these lands depends on sustainable levels of use; protection of natural resources from fire, insect infestation, and overuse; and long-term protection of natural environments and opportunities for solitude.

Future generations won’t have opportunities to enjoy public lands if planning and management decisions made today are swayed by the loudest voice or by lobbying groups with the most financial backing. These decisions must be made based on data and with careful consideration of long-term objectives. As the population increases, the value of quiet places where one can escape urban noise, smells, commotion, lights and the unending barrage of electronic stimuli will soar. If natural environments and quiet places aren’t protected now, they will be lost forever.

The increased volume of people recreating in the backcountry of the GMUG is already showing signs of overcrowding and overuse and negatively affects enjoyment by all types of users. This is happening year-round and has been exacerbated by recent technological advances in backcountry skiing, mountain biking, ATV/UTVs, over snow vehicles, etc. Resources have already been adversely impacted by overuse in areas such as the Gothic Corridor near Crested Butte which recently imposed restrictions on open camping. Restrictions on camping or trail closures in one drainage or one forest are essentially “a short-term bandaid fix” because typically the same problem crops up in another nearby area. As a native Colorado resident, I have repeatedly seen this type of effect spilling over from the Front Range forests which have closed off areas due to overuse or resource degradation. Users simply move to an adjacent area and the problem erupts again. The GMUG has historically had relatively low numbers of users and was able to absorb that overflow, but that is changing as population growth and development on the Western Slope are projected to increase dramatically. Over time, an area reaches a “tipping point” where overuse and overcrowding can detract from the area’s appeal and negatively affect local economies.

***Part II: Key Needs for Change***

***Provide Strategic, Adaptive Direction***

The Forest Plan needs to be a dynamic, adaptive and malleable plan, but also one that is enforceable and based on data and widespread consensus that benefits all users. Monitoring of existing and evolving conditions is imperative and relevant data needs to be collected and analyzed. Consecutive, multi-year data collection and analysis will show trends and is essential for effective management.

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).

***Contribute to Social and Economic Sustainability***

Adequate funding is needed to enforce the rules and guidelines and to effectively manage resources. The Forest Service has experienced extreme budget and personnel cuts over the past years that are unsustainable and threaten everyone’s ability to enjoy public lands. Without adequate budgets, resources will be degraded and future generations will not have public lands to enjoy.

Public and private school programs and trailhead outreach and education programs will help foster appreciation for and promote sustainable use of public lands. Funding for trailhead signs, informational brochures and volunteer training for direct contact with visitors should be pursued.

*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.).*

Ongoing monitoring and data collection that can be compared over multiple years will be useful for determining trends and allowing proactive management decisions to be made.

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

Consider all users (human-powered, non-motorized, mechanized, motorized, and all the in-between hybrids) when developing strategies. All user groups should have fair representation and issues such as noise, safety and impacts to wildlife and resource need to be considered. Noise is an important concern that needs to be addressed, but is not the only issue of concern for non-motorized users. Safety and potential user conflicts on multi-use trails are concerns for hikers and horseback riders. When hikers and horseback riders are required to repeatedly move off popular trails to avoid encounters by mountain bikers or motorbikers their experience becomes less enjoyable.

While hikers/walkers/backpackers are able to access and find solitude in wilderness areas, “wilderness” should not to be managed for the purpose of recreation. In addition, most of these areas are not accessible from winter trailheads. Consider designating areas with opportunities for solitude in non-wilderness areas. Since quiet users are the largest group of recreational users, non-wilderness areas should be managed to ensure opportunity for quiet recreation.

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

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

***Provide for Ecological Sustainability***

Climate change is evident world-wide. Increased recreation use and residential and industrial development in desert ecosystems located in adjacent states to the south and west of the GMUG have contributed to “dust events” in the winter and spring, resulting in the snowpack melting earlier in the spring.

Multiple use must be “balanced multiple use” with representation by ALL stakeholders.

*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”.

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

Wildlife, especially big game thrive in unfragmented natural habitats which should be preserved. The Forest Plan should make protecting and maintaining critical wildlife habitat, elk calving areas and elk migration routes throughout the GMUG a high priority. The impacts to wildlife must be considered a high priority when recreational trail developments are proposed.

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

High altitude, alpine ecosystems are especially sensitive to overuse and should be protected and maintained.

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

The Forest Plan should definitely 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](https://www.mappinessapp.com/), 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 the1983 Plan.*

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

***Build an Accessible, Useful Plan***

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

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

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

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 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.

The following comments are relevant to the Revised Assessment Documents: Designated Areas (March 2018) and Recreation (March 2018). Specifically, under Part II, Key Needs for Change.

***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.*

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.*

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.*

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 should 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 irresponsible, 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….*

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…*

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

Thank you.

