May 30, 2018

Samantha Staley, Forest Planner

GMUG Plan Revision Team

GMUG National Forest

2250 South Main Street

Delta, CO 81416

Dear Samantha and the entire GMUG Forest Plan Revision Team,

Thank you for the opportunity to comment on the scoping material for the GMUG Forest Plan Revision, and for all of the hard work that has gone into this important and inclusive process thus far. Please accept these comments on behalf of the board of directors of Gunnison Trails, a non-profit trail advocacy group located in Gunnison, CO. Our mission is to assist land managers and stakeholders in maintaining existing trails, educating users on proper trail etiquette and environmental stewardship and pursuing new opportunities for sustainable trail-based recreation.

We are pleased to see a more adaptive approach to Forest planning, where flexibility and the use of best available science will help guide the management of our forests in a rapidly changing environment. We are also pleased to see that recreation is identified as an important use on the GMUG National Forest and is compatible with other areas managed primarily for conservation, such as the opportunity for recreation in non-upper tier Colorado Roadless areas. An increase in sustainable trail development is an important component of Gunnison Trails’ mission, and we look forward to working with the GMUG and other stakeholders to plan, build and maintain new trails. Similarly, we are glad to see dispersed camping and the associated issues have been addressed in planning. Many of the resource impacts we deal with here in the Gunnison National Forest are associated with greater numbers of campers with fewer dispersed areas to camp, resulting in damage to vegetation and watersheds. Just as the impacts and stresses to the Forest are changing, changing the way in which we manage these impacts will be critical to changing the behavior and fostering the next generation of stewards for these lands. We feel the GMUG Forest Plan Revision Team has done an excellent job giving voice to the public and encouraging active participation in this process.

Gunnison Trails is a proud member of the Gunnison Public Lands Initiative, a local, collaborative effort to shape land designation here in Gunnison County. As a member of the Gunnison Public Lands Initiative (GPLI) working group, we ask that you strongly consider the recommendations put forth in their proposal. Members of the GPLI working group included Wilderness and conservations advocates, motorized groups and groups representing mountain bikers, among others. This coalition seeks to protect public lands in Gunnison County while preserving historic uses of the land, thus ensuring more broad-based support. One approach we have taken within the GPLI working group is more prescriptive land designations throughout Gunnison County. The use of Special Management Areas (SMAs) allows for specific and tailored management for individual areas on the Forest and Public Lands. While considerably more detailed than the current management framework, we hope the GMUG Forest Plan will recognize the importance of SMAs and how they can be specifically tailored to meet a landscape prescription while providing for existing and future uses. As the population growth in Colorado continues to grow at an unprecedented rate, SMAs will allow for more specific, small-scale management that can adequately address concerns and impacts in certain areas.

GPLI has given a voice to each and every user group here in Gunnison. This collaborative approach, and one that certainly has asked members to compromise in certain areas, creates more unity and buy-in than previous approaches to public land management. We feel that the days when environmentalists were pitted against recreationists are behind us. Through the GPLI working group, we have found that we are stronger and more committed when we work together to solve local resource issues. While we don’t always agree, we respectfully listen and acknowledge the right of everyone around the table to their use of these lands. We believe this approach will create a generation of land stewards that feels more empowered and takes ownership of this process and, therefore, has a responsibility to care for these lands.

Gunnison Trails remains committed to the GPLI working group, and we sincerely hope the recommendations found within the plan are considered. More specifically, Gunnison Trails asks the recommendations from the GPLI working group for Granite Basin to be managed as a Special Management Area be strongly considered. The historic recreational use in this area, as well as the close proximity to the town of Crested Butte, Crested Butte South and highway 135 make this area appropriate for consideration as an SMA. We also hope the GMUG Forest Plan acknowledges the work and importance of local partnerships. Groups like Gunnison Trails and the Crested Butte Mountain Bike Association have a considerable management impact through thousands of volunteer trail work hours each year. In addition, Gunnison Trails funds a full-time trail crew throughout the summer months to address trail and resource concerns throughout the County we can’t otherwise complete with volunteer efforts. We hope the hard work from these groups will not only be acknowledged, but supported. Mountain bike and trail groups across the state account for considerable work done on Forest lands, with mountain bikers often taking a leading role in maintaining the trails so important to the local economies and way of life here in Colorado. We hope these partnerships are encouraged to grow, to help foster a generation of land stewards who will ultimately decide the success of this Forest Plan.

Thanks very much for your consideration,

Tim Kugler

Executive Director, Gunnison Trails

[tim@gunnisontrails.org](mailto:tim@gunnisontrails.org)