

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416
gmugforestplan@fs.fed.us

RE: Grand Mesa, Uncompahgre, Gunnison Forest Plan Revision Working Draft Comments

July 26, 2019

Dear Forest Planning Team,

The Colorado Mountain Club (CMC) is pleased to have the opportunity to provide feedback on the GMUG's Working Draft of the Forest Plan. This intermediate step is a great opportunity for the public to get a sense for where the forest is heading in their planning and provide valuable input before the Draft EIS is released. CMC has been working very closely with two coalitions on a variety of policy recommendations and area designations that specifically protect lands and values associated with human-powered outdoor recreation. We are supportive of the Community Conservation Proposal and the Outdoor Alliance GMUG Vision which both work to strike a balance between resource conservation and sustainable recreation opportunities. Below are some additional comments on the recreation-specific components of the Working Draft that we wanted to highlight because they specifically impact CMC's membership base of hikers, climbers and backcountry skiers

Recreation Opportunity Spectrum

We very much appreciate the working draft including a Winter ROS map which will help set the stage for winter travel management planning in the future. However, by combining the summer and winter ROS classifications into one table and set of descriptions, the forest has missed an opportunity to truly differentiate between different desired conditions for recreation in these very different seasons. We recommend creating an additional stand-alone classification table for winter recreation in order to better address unique winter recreation issues. Both the Flathead National Forest and Custer-Galatin use separate ROS classifications and we recommend reviewing their language. Issues like signage, snow grooming, and backcountry huts are just a few of the settings which have unique needs in winter which are different than summer and may fit into the ROS classifications differently. For example, the presence of primitive winter hut access in semi-primitive settings should be appropriate in the winter ROS. Additionally, semi-primitive motorized winter ROS should not include groomed routes.

Continental Divide National Scenic Trail (CDNST)

- Applaud limitations of motorized use on the CDNST in **FW-STND-DTRL-07** and **FW-STND-DTRL-08**
- Consider adding "mechanized" use to **FW-STND-DTRL-08**: Existing motorized and mechanized use may continue on the Continental Divide National Scenic Trail, as long as it does not substantially interfere with the trail's nature and purpose

National Recreation Trails

- Applaud objective FW-OBJ-DTRL-21 to complete condition surveys and initiate deferred maintenance along the Bear Creek and Crag Crest National Recreation Trails.

Recreation

- Desired Conditions – Consider adding “Impacts from recreation will be carefully monitored and managed to ensure that human activities and recreation infrastructure are balanced with resource conservation and other forest uses.”
- Objectives: “Maintain 500 miles of trails” – what percentage of total trail mileage is this? What happens when new trails are constructed? Consider using a percentage that adjusts as the trail network changes over time
- Objectives: Add Monitoring objective “Annually, complete condition surveys on at least 20% of trails to inform and prioritize future maintenance”
- Objectives: Add monitoring objective “Annually, complete dispersed campsite monitoring on 20% of know dispersed camping areas across the forest” with the goal of collecting metrics for **FW-STND-REC-06**
- Objectives: Add monitoring objective “Annually complete visitor satisfaction surveys and visitor use monitoring” with the goal of metrics for **FW-STND-REC-07**
- Objective: Add “Winter Travel Management planning will be initiated within one year of publication of the Forest Plan”
- Standards: Applaud **FW-STND-REC-05** to restrict motorized & mechanized use to designated routes. Although we are happy with this language, we expect the forest may get pushback from winter motorized users. Consider listing motorized travel types (winter/summer) for clarification.
- Applaud **FW-STND-REC-06 & FW-STND-REC-07** to better manage impacts from dispersed camping and day-use sites. Add “unmanaged sanitation issues (trash accumulation, human waste, etc.) and/or water quality degradation” to **FW-STND-REC-06** Ecological impacts.
- Guideline: **FW-GDL-REC-11** regarding bearproof canisters – Use “May” instead of “Should”

Wilderness

- Objective: Add “The forest will conduct Wilderness character monitoring at least once every 5 years.”
- We strongly support restrictions to both motorized and mechanized use in Recommended Wilderness Areas.

E-Bikes

Because of the recent misinterpretations around Electronic Bicycle classification and push for use on non-motorized trails, we strongly recommend that the forest service include language about E-Bike suitability in the forest plan. Simply, E-Bikes are a motorized form of transportation and should be managed in accordance with the Travel Management Plan as a motorized vehicle. Non-motorized routes may, in some cases, be re-classified to allow E-Bikes but this designation **MUST** happen through a public travel planning NEPA process. We recommend that any language in the forest plan that refers to restrictions or suitability for motorized travel also include the addition of e-bikes, for example in the semi-primitive non-motorized ROS: “These settings are free of motorized recreation transport, including electronic bicycles,…”

Many thanks for your consideration of these recommendations and please don't hesitate to contact me with any questions. Sincerely,



Julie Mach
Colorado Mountain Club
juliemach@cmc.org
303-996-2764