



July 29, 2019

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Forest Plan Revision Team
2250 South Main Street
Delta, CO 81416

RE: GMUG Working Draft of the Revised Land Management Plan, June 2019

Submitted via email; gmugforestplan@fs.fed.us

Dear Forest Planning Team,

Silent Tracks appreciates the opportunity to provide our organization's comments on the Working Draft Revised Land Management Forest Plan. We are mindful of the vast amount of work that has gone into this document to date and wish to express our gratitude to the dedication and hard work of the staff of our local Forest Service offices. Because most recreationists in the GMUG are non-motorized, or "quiet users" according to the most recent Visitor Use Monitoring Report for the GMUG (Forest Service, 2018), we feel the following comments from Silent Tracks represent a large segment of users in the GMUG. Historically, quiet users such as hikers, backpackers, rock climbers, photographers, fisherman, hunters, and others have been under-represented as important stakeholders in our forest.

The Working Draft is, of course, a work in progress. At this time, Silent Tracks feels that the version submitted for review is weak. It is too broad and too flexible to result in clear protections for our public lands. There are numerous examples of good, solid management direction; however, there is no, or very little, language which ensures enforcement of the Guidelines. The word 'should' rather than 'shall' is prevalent throughout this document.

Silent Tracks has organized our comments by first noting several omissions, then by chapter as presented in the Forest Plan.

1) OMISSIONS

a) Winter Travel Management Planning (WTMP)

Addressing Winter Travel Management in the Forest Plan is both critical and appropriate. As stated on page 1 of the Working Draft of the Revised Land Management Plan, "The Forest Plan describes desired conditions, goals, objectives, standards, and guidelines, and identifies land suitability for multiple uses and resources in the plan area." Winter Travel Management

certainly falls into this category. While Winter Travel Management was not included as part of the Forest Plan, it should be recognized as a future project to be completed within a specified timeframe.

Although there is no deadline directive for Winter Travel Management in the [2015 Over Snow Vehicle \(OSV\) Travel Management Rule](#) (Federal Register, 2015), it is imperative that winter travel management planning be addressed as soon as possible after the GMUG Forest Plan is completed.

While the Forest Service approved the existing winter travel plan for the areas surrounding Crested Butte in 1995 (Forest Service, 1995a, 1995b, 2005), there is no comprehensive winter travel plan for many areas in the Gunnison National Forest (GNF). Furthermore, the existing winter travel plan is more than 20 years old, dysfunctional and ambiguous.

Winter recreation use in the GNF has seen a dramatic increase, especially in the last ten years: advances in technology now allow snowmobile riders and hybrid skiers to travel further and higher into backcountry terrain; backcountry Alpine Touring (AT) skiing is one of the fastest growing sports in the U.S.; new sports and related gear such as fat bikes, e-bikes, snow motorcycles, and snowcats, are bringing even more people to the backcountry. Challenges and conflicts between users to share a limited space in the winter backcountry are already apparent, resulting in increased trailhead congestion, safety and waste management issues, potential environmental impacts to winter wildlife habitat, and the recreational experience being negatively impacted.

As of February 2018, there are no designated non-motorized winter use corridors around Crested Butte. The Gothic corridor (historically the only drainage dedicated for non-motorized use in the “Gang of Nine” documents) is now groomed regularly with snowmobiles operated by the Crested Butte Mountain Bike Association (CBMBA) for fat biking enthusiasts. In addition, Gunnison County recently granted Rocky Mountain Biological Laboratory (RMBL) a limited snowmobile use permit to access and service their facilities.. Additionally, permits for private landowners in the Schofield area have been issued to allow snowmobile access via the Gothic corridor.

Protocols for how the WTMP will be conducted and implemented should be clearly presented. It is unclear to us if the Revised Winter ROS will supersede the WTMP or if the adoption of the Revised Winter ROS will be altered and adopted after the WTMP is finalized. It is also unclear how the different user groups will be represented.

b) Proposed New Wilderness Designations

Not proposing any new wilderness in the Forest Plan is disappointing, especially since the Gunnison Public Lands Initiative Proposal (GPLI, 2019) Proposal, the Community Conservation Proposal (GMUG Revision, 2019) and the Outdoor Alliance GMUG Vision (OA, 2019), plus others

have demonstrated community interest in more acres of wilderness designations. Silent Tracks and many residents of the upper Gunnison Valley have also indicated support for a proposed wilderness designation for the Granite Basin/Cement Mountain area. The proposed wilderness boundaries would allow the existing Eccher Gulch mechanized trail to continue to remain in place with wilderness on either side. This area has been studied extensively and was recommended for wilderness consideration starting in 1967 and most recently in the Draft 2007 Forest Plan.. It is a rare opportunity to preserve land as wilderness for primitive recreation which is easily accessible to adjacent communities.

c) Winter ROS Comparison Maps

The Winter ROS maps tool is useful, but the maps are difficult to decipher because the boundaries are unclear, major features and roads useful for orientation are not delineated and the areas on the Existing Winter ROS maps that were changed on the Desired Winter ROS maps are not easily identified. In addition, there are no identifying labels on parcels for submitting specific comments. Once we can clearly discern the proposed changes, comments on specific areas will be forthcoming. In general, Silent Tracks supports all areas with proposed use changes from designations as semi-primitive motorized to semi-primitive non-motorized.

2) Comments - Chapter 2, Forestwide Direction

Part II

d) Alpine Uplands Objective FW-OBJ-TEV-04

Within 10 years of plan approval, enhance the resiliency of alpine ecosystems on 100 acres of GMUG lands through implementing recreation management plans, completing mine land reclamation, or conducting other management activities. See Key Ecosystems Characteristics FW-DC-ECO-03.

Alpine uplands are one of the most sensitive habitats on the forest and are under increasing pressure from climate change, as well as recreation use. Enhancing the resiliency of uplands on 100 acres over 10 years is insufficient protection for these areas.

e) FW-DC-AQ-03: Air quality for the Class II areas within the planning area are maintained or improved with respect to pollutant concentrations and deposition so that human health and the integrity of associated air quality-related values and aquatic and terrestrial ecosystem components are protected.

Silent Tracks appreciates the commitment of the Forest Service to protect air quality. Knowing that two-stroke snow machines and motorcycles are more polluting than four-stroke, and with the significant increased use of OSV's and ATVs, we recommend the Forest Service look carefully at ways to reduce air pollution by curtailing vehicles which emit unnecessary pollutants.

A move to require the use of Best Available Technology (BAT), similar to restrictions on snowmobiles in Yellowstone National Park (YNP), would be appropriate. A review of the YNP website reveals that there are dozens of make and model snowmobiles that meet the New NPS BAT Requirements. The BAT requirement should be considered for all motorized recreation vehicles not just snowmobiles.

The restrictions used at YNP may be found at; <https://www.nps.gov/yell/planyourvisit/newbatlist.htm> and the data are summarized in the following table:

Overview of BAT Requirements

	Air Emissions (g/kW-hr)		Sound Emissions (dBA)
	Hydrocarbons	Carbon Monoxide	
Average 2-Stroke (Non-BAT)	150	400	78
EPA Snowmobile Air Emission Requirements ¹	75	275	
New NPS BAT Requirements	15 ²	90 ³	67 ⁴

- f) **FW-DC-SPEC-14: Relatively undisturbed areas provide habitat blocks that function as security areas for populations of big game and other species. Migration and movement corridors provide sufficient cover to allow for relatively unabated movement of big game species across the landscape.**
- g) **FW-GDL-SPEC-17: To maintain long-term population viability and herd population and distribution objectives, activities that displace bighorn sheep, Rocky Mountain elk, mule deer, pronghorn, and moose should not be authorized in production areas during their reproductive period (Table 4) and on severe and critical winter range and winter concentration areas.**

Consider preservation of migration and movement corridors, production areas and critical wildlife habitat when planning new trails or other development (roads, etc.). The production areas could be impacted by late winter / early spring recreation including fat biking, backcountry skiing, and snowmobiling.

Part III

- h) **FW-DC-LSU-01: National Forest System lands are consolidated, providing reasonable access and efficiency of land management while protecting resource values. All National Forest System roads and trails that access the Forest or cross private**

inholdings have legal access or a documented right-of-way, and boundary lines and property corners are easily locatable.

Access to public lands is a high priority for all users. Efforts should be made to balance private property rights and access to public lands. A guideline should be added that says that in any disposal of Forest Lands the Forest Service will evaluate the appropriateness of retaining public access through those lands to ensure continued public access to adjacent public lands.

i) Recreation

Of particular concern to Silent Tracks is the ambiguity regarding the forms of recreation and other uses that may occur on the landscape. The descriptor “General Forest” is used to cover too much of the forest. We would like to see a plan that reflects the historic, “quiet use” areas within the forests and that protects those uses with clear standards. For example, much of the Gunnison National Forest is not specifically demarcated as to motorized recreation, especially in winter. Areas that are not specifically closed are thereby assumed to be open. With the growing population of our region, and Colorado in general, we would like to see strong protections put in place to keep quiet places quiet and that protect the amenity of solitude where it currently exists. We would like to see a forest-wide standard that requires all motorized trails (winter and summer) and area designations be consistent with the ROS of the area.

j) FW-OBJ-REC-04: Annually, maintain 500 miles of Forest Service trails, prioritizing those in the high-use recreation areas (MA 4.2).

According to CBG Trails (CBG, 2019), the GNF, only one part of the GMUG, currently has over 750 miles of multi-use hiking, mountain biking, and motorized trails in non-wilderness areas around Crested Butte and Gunnison, plus 450 miles of hiking and horseback trails in wilderness areas. While not all trails are open to all uses, the objective to maintain 500 miles of trails in the entire GMUG seems very inadequate. Does this number include provisions for maintaining trails in wilderness areas?

k) FW-STND-REC-05: Motorized and mechanized use shall be restricted to designated system routes. Motorized and mechanized travel includes, but is not limited to, travel by bicycles, electric-assist bicycles, mountain bikes, unicycles, tricycles, skateboards, and mountain boards.

Will electric assist bikes be allowed on non-motorized trails? What is GMUG policy for mountain bikes in wilderness areas?

l) FW-STND-REC-06: Designate or otherwise manage dispersed campsites when use levels result in unacceptable ecological impacts.

Silent Tracks supports increased monitoring and management of dispersed campsites. Providing pit toilets and limiting the size and number of campsites is crucial. Regular monitoring and strict

enforcement are needed. Create user friendly mechanisms to submit photos depicting conditions and voice concerns.

- m) **FW-GDL-REC-10: To maintain or improve the recreation setting, all management activities, including development of new facilities, should be consistent with or move the area toward achieving the desired recreation opportunity setting and associated site modification as defined in Table 6 and mapped.**

Verify shading on Desired Winter ROS for all wilderness areas is “primitive”.

2) Comments Chapter 3, Management Area Direction

n) **Wilderness and Areas Where Natural Processes Dominate (MA 1)**

Wilderness Management Plans are not discussed in this section. Are they all completed? Are management actions and monitoring being carried out? If not, there should be an objective to complete or update them and implement them. Silent Tracks conducted solitude monitoring in 2018 for the Gunnison National Forest. In the absence of wilderness management plans in the Draft Forest Plan, it is unclear what future support the FS may need from NGOs and others in this regard.

- o) **MA-DC-WLDN-02: Recreation opportunities offer experiences that are primitive and unconfined, provide solitude, and promote self-reliance.**

Wilderness preservation is crucial for future generations as well as wildlife. The Forest Plan should state its position on mountain biking in wilderness areas.

- p) **MA-STND-WLDN-05: Activities or occupancies not expressly allowed in the Wilderness Act that will be authorized by special use permit: (1) will follow the minimum required decision guide; and (2) will not result in permanent structures, unless allowed by the Wilderness Act, subsequent legislation establishing a particular Wilderness unit, or existing rights. Competitive recreation events shall not be authorized to occur within designated wilderness areas.**

Preserving wilderness character for future generations should be THE top priority. Granting special use permits should be limited and monitored and we agree, competitive recreation events should be prohibited to prevent adverse impacts to the environment and wildlife.

- q) **MA-STND-WLDN-09: Group size of more than 15 people or a group of people and stock consisting of a combined total of more than 25 shall be prohibited in all wilderness areas where the GMUG is the lead Forest. Activities authorized by special use permit may exceed these group size limitations when the activity: (a) will benefit the wilderness character, or (b) is necessary for public health and human safety.**
- r) **MA-STND-WLDN-10: The use of a drone in a designated wilderness shall be prohibited.**

- s) **MA-GDL-WLDN-11: To maintain wilderness character and limit resource damage, designate or otherwise manage dispersed campsites when use levels result in unacceptable impacts. Pristine areas should be closed to camping when sites are unable to recover within 1 year.**
- t) **MA-GDL-WLDN-12: To maintain wilderness character, new trails should not be constructed in wilderness areas. If they improve wilderness character or reduce natural resource impacts, re-routes may be permitted.**
- u) **MA-DC-WLDN-13: The wilderness characteristics for which areas were recommended for wilderness designation are maintained or improved.**

Protection of the solitude and quiet areas that wilderness provides are values that the members of Silent Tracks hold dear. Silent Tracks supports wilderness standards 07, 09, 10, guidelines 11 and 12, and desired condition 13, as presented.

v) Timber and Other Forest Products (TMBR) Page 52.

This section does not specifically describe methods for assuring that new roads, or retired roads reopened for timber harvest, are properly reclaimed and closed to motorized and mechanized travel so as to avoid proliferation of new trails and roads. (General guidance regarding reclamation and closure is found in other sections, i.e. FW-STND-TSTN-03.) Experience has shown that once a logging road or skidder trail is built, closing the route and keeping it closed can be challenging. Stronger emphasis in the *Timber and Other Forest Products* section should prescribe an unambiguous and enforceable methodology for closing temporary routes and keeping them closed. Fines and other deterrents for violating route closures should be sufficiently significant to assure compliance. Resources for enforcement should be mandated.

w) Wildlife Management Area – MA 3.2 (WLDF)

MA-STND-WLDF-02: To provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where areas are already in exceedance of the 1 mile per square mile limit⁸ as calculated within this management area boundary. Within the Flattops Wildlife Management Area on the Gunnison Ranger District, there shall be no new trail development. Exception: this does not apply to administrative routes.

Although Silent Tracks represents human-powered recreationists, we do not support any new trail development in the Flattops Wildlife Management Area. We recognize the importance of protecting elk migration routes and calving areas, minimizing habitat fragmentation, and the intrinsic value of protecting areas for wildlife. The expertise of Colorado Parks and Wildlife (CPW) should be considered a critical partner in the decision-making process for the Forest Service on trail development issues.

- x) **MA-STND-MTR-05: Snow management, including snowmaking and snow-farming, shall be conducted in a manner that prevents slope failures and gully erosion, as well as bank erosion and sediment damage in receiving channels.**

This section does not mention standards or guidelines or limits for removing water from streams to make snow. If climate change reduces the snowpack or stream flow is low, drying up streams or significantly altering their nature in order to make snow would be extremely detrimental to aquatic life.

- y) **High-Use Recreation Areas - MA 4.2 (HIREC)**

A lot of emphasis is directed toward the high-use recreation areas, which we applaud. However, it is important that resources also be allocated to the less traveled areas in the forest “to improve recreational experiences and curtail natural resource impacts, management controls should be implemented and adjusted based on changing environmental conditions, visitation patterns, and use types.”

- z) **MA-GDL-HIREC-03: To improve recreational experiences and curtail natural resource environmental conditions, visitation patterns, and use types. Typical management controls such as camping only in designated sites, shorter stay limits for camping in comparison to existing 14-day national standard, no unauthorized overnight use, parking restrictions, additional amenities supported through a fee program, restricted modes of transportation on roads and trails to reduce safety issues and social conflict.**

Silent Tracks supports all of the suggested types of management controls. In addition, consider separating users in high volume areas by rotating timed use restrictions or developing separate trails for different user types, while minimizing restrictions to the greatest extent possible. Develop improved signage and trail etiquette and outreach programs. In addition, we encourage the FS to utilize data collected by independent researchers to monitor changing conditions. For example, the Data Collection Initiative (DCI) conducted by WCU graduate students, has collected winter recreation user data in the Crested Butte area for four consecutive winters. This type of data collection program should be implemented and utilized to make management decisions throughout the GMUG.

- aa) **MA-GDL-HIREC-04: To protect infrastructure, mitigate natural resource damage, provide for public safety, and maintain positive visitor experiences, implement controls such as limiting modes of transportation on certain routes, establishing directional trails, constructing larger accessible trails or boardwalks, or creating parallel system routes or stacked loops to accommodate higher volumes of use where necessary.**

Silent Tracks members share multi-use trails with mechanized and motorized users. Hikers' experience is diminished if they have to constantly step off the trail to avoid bikers or motorcyclists. Similarly, mechanized and motorized users don't like having to slow down to accommodate hikers or xc skiers. We strongly encourage the FS to consider ALL of the alternatives listed above, especially in areas close to communities which experience high use.

3) Comments - Chapter 4 Monitoring

- bb) **“Specific Requirements for Monitoring under the 2012 Planning Rule. This section includes the statement; “in developing the monitoring plan, the responsible official should also provide opportunities for public participation, taking into account the skills and interests of affected parties, as well as the scope, methods, forum, and timing of those opportunities...”**

- cc) **Silent Tracks welcomes the opportunity to support the needs of the FS where the skills and interests of our membership are applicable. We have supported the Western Colorado University Data Collection Initiative for the past four winter seasons contributing over \$9,000 in funding support. We also worked with the FS to conduct solitude monitoring in the West Elk Wilderness in 2018. We believe that this section of the Forest Plan should include a guideline that encourages the FS to collaborate with educational institutions and other partners like Silent Tracks that can contribute to effective monitoring in a cost-effective way.**

- dd) **Partnerships -**

Throughout the document, mostly in the appendix, there are scattered references to working with partners. Federal land management budgets are not growing significantly, and large portions of the budget are increasingly diverted to cover the cost of firefighting. There is also a growing willingness for educational institutions, non-profit organizations, local jurisdictions and the general public to become more involved with helping to manage their public lands. There should be a Forest-wide emphasis placed on developing, supporting and increasing partnerships to assist with a wide variety of management activities.

4) References

- Crested Butte/Gunnison Interactive Trails app (CBG Trails),2019. Available at <https://www.cbgtrails.com/>
- Federal Register, 2015. Use by Over-Snow-Vehicles (Travel Management Rule), 80 FR 4500, Page 4500-4512. 36 CFR 212, 36 CFR 261, Document Number 2015-01573 Available at <https://www.federalregister.gov/documents/2015/01/28/2015-01573/use-by-over-snow-vehicles-travel-management-rule>
- GMUG Forest Plan Revision, 2019. Community Conservation Proposal. Available at <https://www.gmugrevision.com/>
- Gunnison Public Lands Initiative, 2019. Gunnison Public Lands Initiative Proposal, January 2019. Available at <https://www.gunnisonpubliclands.org/gpli-proposal>
- Outdoor Alliance (OA), 2019. GMUG Vision, July 2019. The report is available at <https://www.outdooralliance.org/gmug-national-forests> and the interactive map is available at <https://outdooralliance.maps.arcgis.com/apps/MapSeries/index.html?appid=009d8ce7c28a4fd79bc420c57a8b131e>
- USDA Forest Service. 1995a. Dispersed Winter Recreation in the Crested Butte Area FONSI. Available https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd488181.pdf
- USDA Forest Service. 1995b. Environmental Assessment Dispersed Winter Recreation Management in the Crested Butte Area, April 1995. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd488180.pdf
- USDA Forest Service, 2005. Decision Memo Washington Gulch, Forest Supervisors Special Order Implementation, December 2005. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd488182.pdf
- USDA Forest Service. Winter Recreation Around Crested Butte Map Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5397031.pdf
- USDA Forest Service, 2016. National Visitor Use Monitoring Survey Results National Summary Report Data collected FY 2012 through FY 2016 Available at <https://www.fs.fed.us/recreation/programs/nvum/pdf/5082016NationalSummaryReport062217.pdf>
- USDA Forest Service. 2018. Visitor Use Report Grand Mesa Uncomp Gunnison NF USDA Forest Service Region 2 National Visitor Use Monitoring Data collected FY 2014, updated November 29, 2018. Available at https://apps.fs.usda.gov/nvum/results/ReportCache/2014_A02004_Master_Report.pdf

Silent Tracks Comments on Working Draft Forest Plan
July 29, 2019

Thank you again for this opportunity to provide input into the GMUG Forest Plan Revision.

Respectfully,

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