



November 10, 2021

Attn: GMUG Plan Revision Team
2250 South Main Street
Delta, CO 81416

Thank you for the opportunity to submit comments to the GMUG Forest Plan, and for the outreach you have conducted to help forest users better understand how to take part in the forest management process.

The Crested Butte Mountain Bike Association (CBMBA) has partnered with the GMUG and Gunnison Ranger District since 1983, and appreciates your commitment to engaging with local organizations, including opportunities for shared stewardship. CBMBA believes that recreation engenders authentic connections to the environment and that proper planning and collaboration provides for ecological and environmental sustainability.

Thank you for taking the time to consider the information, suggestions, and comments listed below.

Respectfully,

CBMBA Staff and Board of Directors

Comment 1: Trails and Management Areas

Increase Recreation Emphasis Corridors/Areas (MA-4.2) and concentrate on stacked trail systems with progressive, purpose-built trails and features, directional travel, specific identified uses, and decking/boardwalks in identified areas (FW-DC-TRLS-01/FW-OBJ-TRLS-02/MA-GDL-EMREC-04).

Detail & Rationale:

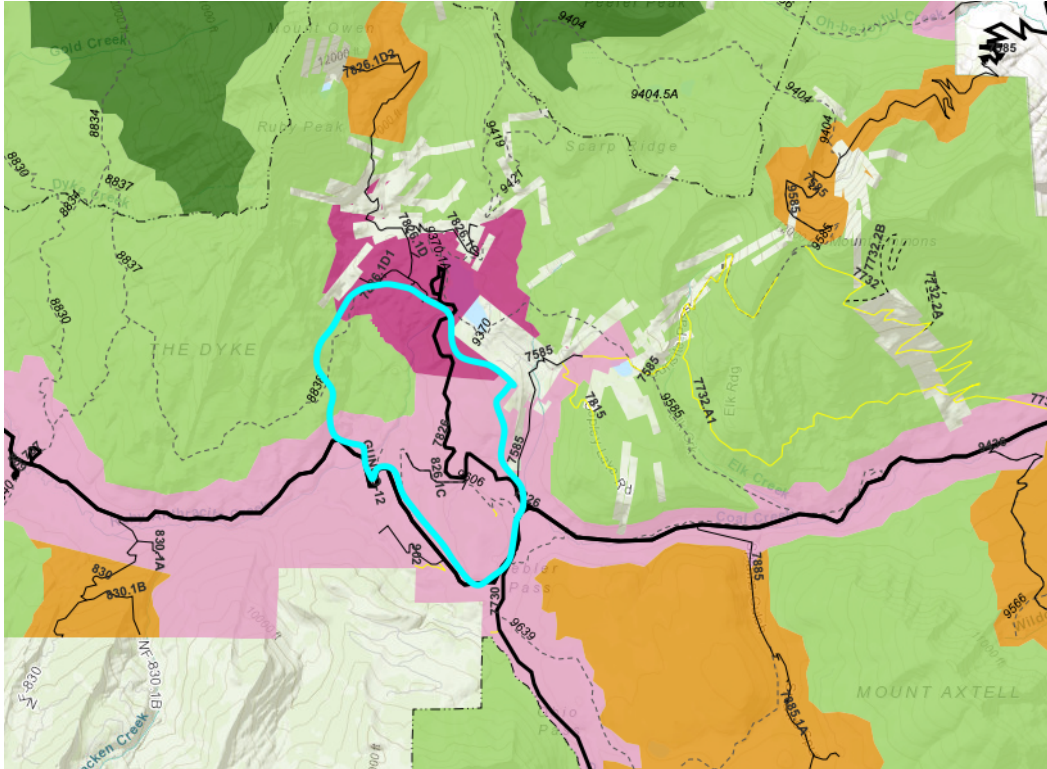
CBMBA appreciates the desired conditions identified for trails (FW-DC-TRLS-01), the objectives for trails (FW-OBJ-TRLS-02), and the desired conditions for Recreation Emphasis Corridors (MA-DC-EMREC-01), but requests that additional Recreation Emphasis Corridors/Areas (MA-4.2) be identified in the final draft, specifically implementing the guidelines in MA-GDL-EMREC-04. GPLI recommendations for both conservation and potential trail opportunities have also been widely vetted and provide an example of forest-wide recreation opportunities in Gunnison County/Gunnison National Forest.

The Gunnison National Forest is a popular mountain bike destination, and CBMBA values sustainable recreation opportunities and the economic, social, and mental health benefits they provide for the local community and visitors. CBMBA represents an expansive constituency of mountain bikers, and believes that progressive, mountain bike-specific trails would provide an overall benefit and world-class recreation amenity to the Gunnison National Forest. CBMBA has spent years planning and gathering comments alongside stakeholders and community members to realize short and long-term trail plans. Not unlike the GMUG and the individual Ranger Districts, CBMBA receives significant feedback requesting new trails, improved network connectivity options, and progressive trail design and planning. Recreation areas should be accessible and closer to population bases with minimal interference from motorized traffic. We strongly support the planning team's conditions for stacked/looped trail systems in appropriate areas (FW-DC-TRLS-01/MA-GDL-EMREC-04).

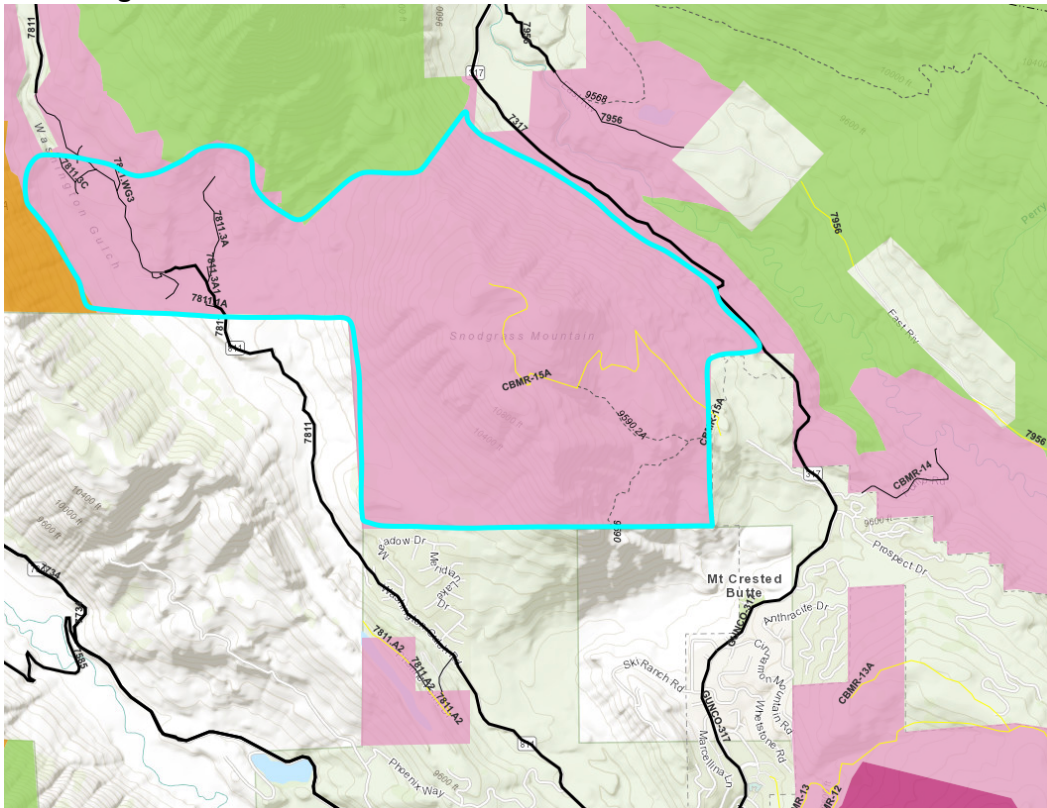
CBMBA has identified and proposed four specific areas that are ideal for stacked/looped trail systems. These proposed areas are close to population centers, are *all* identified as General Forest (5) or Mountain Resort (4.1) in the proposed Forestwide Management Area Maps, and are also *either* identified already as Roded Natural, Rural, Semi-primitive Non-motorized, or Semi-primitive Motorized in the ROS alternatives. They do not contradict or overlap inadvertently with the GPLI proposal, and these areas are appropriate for more progressive stacked/looped trail and recreation amenities like trail features, directional travel (such as uphill only or downhill only), user-specific trails (such as hike or bike only), and decking/boardwalks. CBMBA's Proposed Recreation Emphasis Corridors/Areas are indicated by the light blue boundaries in the images below, utilizing the Alt. B Summer ROS (Interactive Story Map) with imported polygons.

Images below.

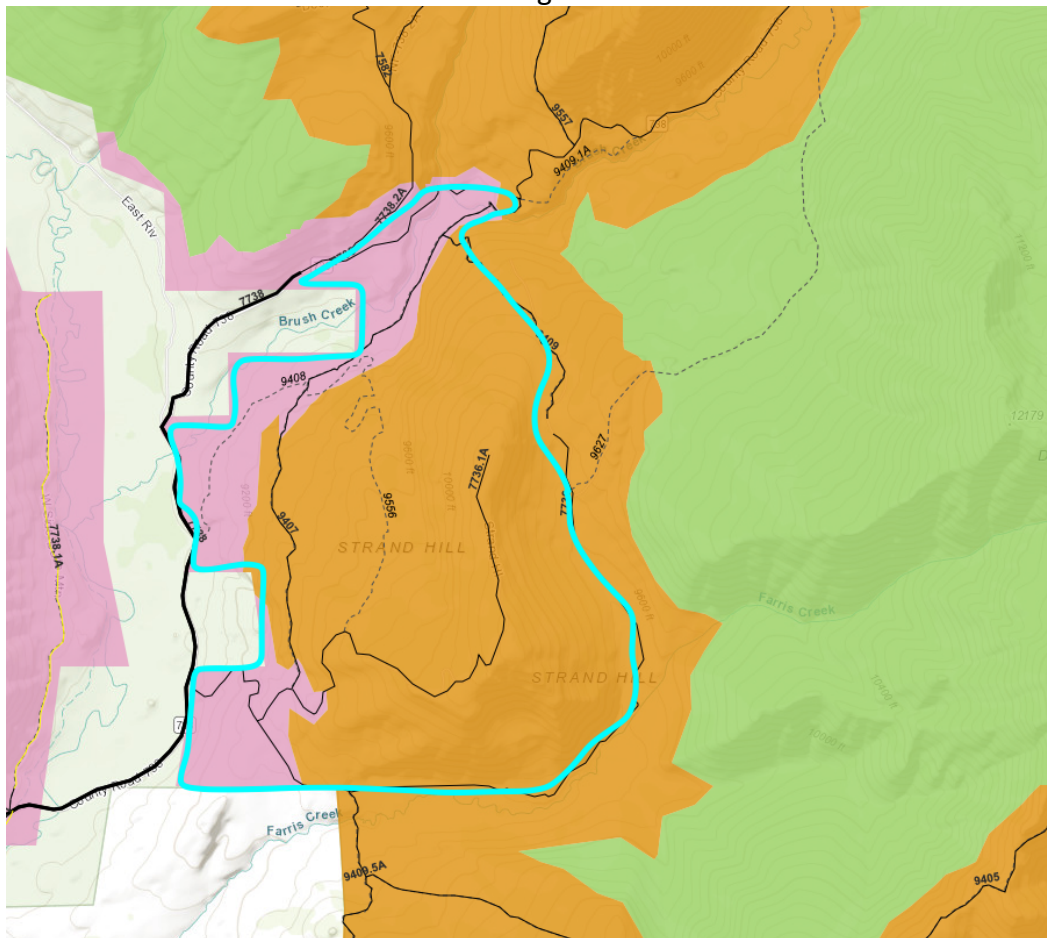
1. Irwin Lake Area – Kebler Pass Drainage



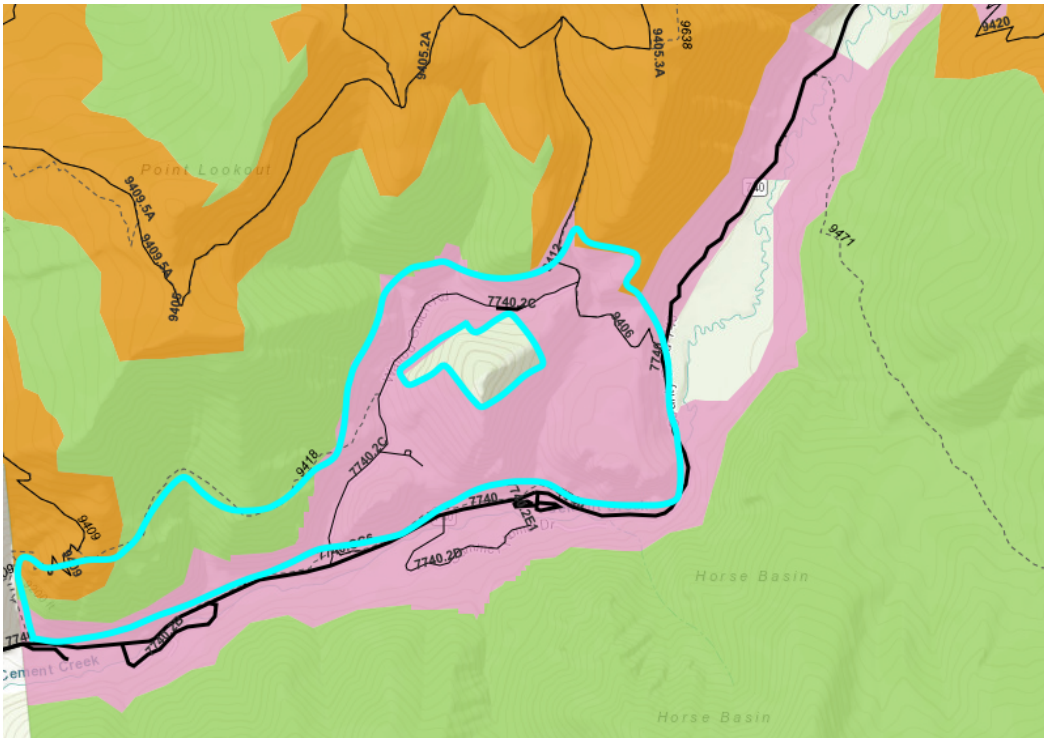
2. Snodgrass Mountain Area – Mt. Crested Butte



3. Strand Hill Area – Brush Creek Drainage



4. Walrod Gulch Area – Cement Creek Drainage



Comment 2: Gunnison Public Lands Initiative (GPLI)

Incorporate the Special Management Areas identified by the Gunnison Public Lands Initiative into the final plan. Although Alternative D recognizes the components of several citizen conservation groups, the GPLI designations represent a larger array of interests and recommendations.

Detail & Rationale:

CBMBA has been a proud member of the GPLI coalition since its inception in 2012, and has worked alongside community members, key stakeholders, and diverse agencies to create a plan for a healthy and sustainable forest. This process has included engaging with the GMUG early in the process, hosting open houses, soliciting comments from the public, and commenting during each phase of the 2019 Working Draft. Ultimately, this resulted in a public lands proposal that is not only endorsed by public officials and Gunnison County, but also top scientists and specialists from various fields, including RMBL. GPLI’s Special Management and Wilderness Area designations is the result of a detailed and timely immersion into the vast Forest Service and public lands of Gunnison County. Special Management Areas have been identified in National Forests throughout the country and provide a progressive forest management approach for the modern era.

Comment 3: Shared Stewardship, Trail Building, and Maintenance

Modify Table 12 (p. 67) of the Semi-primitive non-motorized ROS setting prescription to allow local land stewards (with permission from Ranger Districts) to utilize motorized devices to fulfill improvements and implementation for *summer and winter* forest initiatives in non-motorized areas and Recreation Emphasis Areas.

Detail & Rationale:

CBMBA requests that standard language be added to the ROS settings to allow for utilization of motorized devices (mini-excavators, e-bikes, chainsaws, e-chainsaws, etc.) to execute summer trail

improvements and future forest initiatives. Particularly in a ‘stacked/looped trail’ system, certain motorized devices would vastly improve access, efficiency, ease of trail building, trail maintenance, and construction of trail features. From a desire to facilitate the best possible trail and forest improvements and experiences with efficient maintenance techniques and progressive new trail building, CBMBA recommends that motorized devices are allowed in otherwise non-motorized designated areas and specifically in Recreation Emphasis Areas.

CBMBA also recommends that the planning team amend the Winter spectrum of the Semi-primitive non-motorized ROS setting to allow for potential areas of motorized grooming for non-motorized winter use. Motorized grooming for non-motorized recreation provides an experience that is more aligned with the Semi-primitive non-motorized ROS setting. A Semi-primitive non-motorized area that has a groomed road (Roaded Natural) for access could provide high quality and highly-desired non-motorized recreation with managed/permitted grooming. An example of this is the Gothic Corridor. Gothic Road has a Rural ROS setting and is a non-motorized route, but CBMBA has a permit to groom it for non-motorized winter use. This provides expanded recreation for non-motorized users (skiers, fat bikers, snowshoers, dog walkers, etc.) and also helps to better manage a high use winter area. CBMBA recommends that the planning team permit expanded motorized grooming to the Brush Creek, Slate River, and Cement Creek corridors, and allow for off-the-road grooming for non-motorized use. These potential opportunities and areas are close to high-use areas, experience increased impacts and multiple uses, and would benefit from planned and managed winter recreation. These settings or designations could be proposed and identified in the travel management process, and designated on the ROS by the dashed line denoting non-motorized groomed/Nordic.

Comment 4: Technology

Identify specific areas suitable for e-bike usage and continue to keep mountain bikes in the Semi-primitive non-motorized ROS setting.

Detail & Rationale:

CBMBA appreciates the GMUG acknowledging advancements in recreational equipment technologies (FW-DC-REC-01), and would like to see a management plan in place for future uses. As e-bikes continue to gain in popularity and are already using the forest, CBMBA requests that the planning team approaches e-bikes as a separate use, and explores opportunities for legal e-bike use and potential e-bike management initiatives separate from mechanized travel. Higher speeds and volume of users via technological improvements in equipment have created increased user conflicts. CBMBA believes existing motorized system routes are appropriate for e-bikes, but that certain Recreation Management Areas like MA 4.1 (Mountain Resorts) would also be appropriate locations for scoping potential e-bike routes and access on traditionally non-motorized trails. CBMBA also believes that e-bikes may be suitable in some non-motorized settings, with scoping via the travel management process. High impact areas close to population bases are *not* suitable for e-bikes, as high speeds and high-volume lead to user conflicts. Conflicts over e-bike use could be decreased by the development of directional trails and user-specific trails in Recreation Management Corridors/Areas and stacked/looped trail systems. Having a system in place to effectively manage new technology is in the best interest of the overall management of the forest and should be considered in the final draft.

In regards to FW-GDL-REC-16, CBMBA appreciates the guideline to develop area management plans for trails and travel management planning. CBMBA believes the highest quality mountain bike trails and mountain bike trail experiences are in Semi-primitive, non-motorized settings, and we would like to see more of these opportunities in travel planning and management. CBMBA also believes that mechanized use is more aligned with human-powered recreation and non-motorized use/access. With a growing population base and increased visitation numbers and impacts, human/muscle-powered recreation is more aligned with Semi-primitive ROS settings. For this reason, we support Alternative B, with components of Alternative D. Specifically, CBMBA would like to see the Gunnison Public Lands Initiative (GPLI) be further incorporated into the Forest Plan, including Special Management Areas.

Comment 5: Trail Route/Density Standards

Determine a data-driven approach for decisions regarding trail density and recreation feasibility.

Detail & Rationale:

While CBMBA is in support of Wildlife Management Areas, the proposed 1.0 mile of trail per 1.0 sq. mile area in the Wildlife Management Areas is an inconclusive standard. CBMBA respectfully requests an alternative approach that is more specific and data-driven, taking into account that each specific area has differing wildlife impacts and uses, migratory impacts, and seasonal uses. There is no 'one-size-fits-all' practice for route density standards, specifically for non-motorized use.

Comment 6: Recreation

Recognize day use, recreation, and camping areas and provide necessary infrastructure and enforcement protocol.

Detail & Rationale:

Increased system infrastructure is required in highly impacted recreation areas for both day use and overnight camping areas. Popular trails that attract large numbers of users do not have adequate trailhead facilities, including parking, bathrooms, and signage. An example of this is Washington Gulch Trail #403, a popular hiking and biking trail that can see over 250 users on a busy day. This trail only has adequate parking for 12 cars, leading to makeshift overflow parking that is destructive to natural resources and disruptive to private property.

CBMBA appreciates the desired conditions that the plan provides (FW-DC-REC-01/02), and would like to see several components added to the conditions, objectives, and standards for this component of the plan. CBMBA encourages the planners to include more recreation emphasis areas and systems to concentrate impacts in already fragmented areas. Stacked trail systems and multiple use trail opportunities (directional trails, hike/horse trails, bike only trails, etc.) close to high-use areas would complement these already-impacted recreation management areas. Many popular camping and recreation areas in the Crested Butte area require the user to drive away to access trails, thus compounding parking issues at under-developed trailheads. Trail connectivity and networks are essential to recreation management, resource sustainability, and positive user experiences.

CBMBA is glad to see a standard addressed to dispersed overnight use (FS-STND-REC-07) to designate or otherwise manage dispersed campsite issues. CBMBA assisted the Gunnison Ranger District in implementing designated camping in the six drainages surrounding Crested Butte, which has had a noticeably positive impact. Designated campsites limit resource damage, increase accessibility for maintenance and upkeep, provide structure and etiquette, and promote better user behavior. Improvements to recreation infrastructure should be a priority to address growing use and impacts by including bathrooms and signage, and having a system for enforcement.

Dispersed Day use areas (FW-STND-REC-08) would also benefit from infrastructure, including signage, permitting, bathrooms, and proper information. Biophysical impacts can be mitigated by providing information, trash receptacles, bathrooms, parking, and designated access.

Comment 7: Recreation

Eliminate additional unauthorized motorized travel routes.

Detail & Rationale:

In regards to FW-OBJ-REC-06, CBMBA suggests the agency further reinforce Semi-primitive non-motorized settings by eliminating more than just two unauthorized motorized travel routes. Working alongside local stewardship and maintenance partners, the USFS could implement much more decommissioning of unauthorized motorized routes. Besides unauthorized trails or non-system routes, CBMBA has witnessed detrimental impacts to sensitive alpine areas due to user created campsites and unwarranted alternative routes that could easily be addressed to prevent further resource damage.

Comment 8: Recreation

Require portable toilets or WAG bags for all overnight users in areas without toilet facilities.

Detail & Rationale:

To manage continuing issues with human waste (FW-GDL-REC-13), bathrooms at popular areas should be a priority. In areas where bathrooms aren't available, portable toilets and/or WAG bags should be a standard for overnight users in order to protect valuable watersheds and resources. Crested Butte Conservation Corps (CBCC) crews cleaned up 68 human waste piles and 6 'homemade' toilets in 2021 alone, along with copious amounts of used toilet paper each year. Sensitive natural environments have been increasingly compromised with findings of e-coli in streams surrounding Crested Butte. Standards for individual waste collection would provide for less biophysical impacts, as well as more enjoyable experiences for all users.

Comment 9: Recreation Opportunity Spectrum (ROS)

CBMBA respectfully recommends the following errors be corrected on existing inventory and on all the proposed Alternatives.

Detail:

- In the Brush Creek drainage (FS #7738), Strand Bonus Trail #9407 is on the existing ROS inventory, as well as each of the ROS alternatives, as a motorized trail. It is a non-motorized trail and the data should correspond. The inventory data lists it as motorized and the line-type is incorrect (it should be a dotted line).
- The portion of Farris Creek Trail #9409 that is south of Farris Creek Road #7736 is on the existing inventory and all alternatives as a motorized trail. It is a non-motorized trail and should be displayed with a dotted line. In the inventory data, the trail is listed as managed for bicycle, pedestrian/hike, and horse, and is motorcycle restricted, but the line type (solid line) is incorrect on the map.
- In 2021, in partnership with the Gunnison Ranger District, CBMBA community volunteers and trail crews completed the Middle Cement Creek Trail, #9399. It is a non-motorized system route/trail in the Cement Creek Drainage and should be added to the inventory.
- Washington Gulch Trail #9403, connecting the Washington Gulch and Gothic Drainages, should show a reroute completed in 2018 that takes the trail off of private property and onto Gunnison National Forest lands.
- Deer Creek Trail #9568 had reroutes completed in 2017 and 2018 that also moved portions from private property onto National Forest lands.
- In 2016, the Happy Hour Trail connecting Crested Butte Mountain Resort and the Upper Loop Trail #9435 was completed, and should also be added to the map as a non-motorized system route/trail.
- In 2018, the Baxter Gulch Trail #9565 was completed and connects to the Carbon Creek Trail #9436 in the Kebler Drainage. It is a non-motorized system route/trail and should be added to the inventory.
- In between Trails #9409 and #9409.5, just north of the Cement Creek Road #7740 start from State Highway 135, Alternative B shows a semi-primitive non-motorized polygon. In Alternative D, it's shown as 'Roaded Natural'. There are no roads here and it is not suitable for road construction. The Farris Creek Trail #445 (Point Lookout Trail), non-motorized, connects Trails #9409 and #9409.5, and the area should remain semi-primitive non-motorized as it is shown in Alternative B.