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Chad Stewart, Forest Supervisor  
Grand Mesa Uncompahgre and Gunnison National Forests  
2250 South Main St.  
Delta, CO 81416

Silent Tracks is a local 501(c)3 non-profit organization based in Crested Butte, whose mission *“is to protect and promote human-powered recreation in the backcountry of the Gunnison Valley”*.

We appreciate the time and effort the GMUG has spent to develop the August 2021 Draft Environmental Impact Statement for the Land Management Plan Revision, GMUG, Volume 1, Chapters 1-4 (DEIS), and the Draft Revised Land Management Plan, GMUG (Revised Plan). Thank you for the opportunity to provide feedback and your consideration of our comments. We recognize the challenges of balancing the “active management emphasis” expressed in Alternative C with the “special areas emphasis” of Alternative D. This is daunting, but in the final iteration, the GMUG should make decisions based on a long-term perspective that balances conserving the GMUG’s valuable and irreplaceable natural resources and protecting wildlife; considers the impacts of climate change; and sustainably balances recreation and other uses to maximize benefits for current and future generations.

We are submitting these comments on behalf of human-powered recreationists and our supporters/members. According to the National Visitor Use Monitoring Report for the GMUG, (USFS, 2018) and the National Visitor Use Monitoring Report (USFS, 2021), the most popular activities in the GMUG and in National Forests across the United States are human-powered, non-motorized activities. Furthermore, as the Gunnison County Board of Commissioners stated in their letter to the Forest Service dated July 16, 2021, “Human-powered outdoor recreation is a major economic engine on the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG).” In addition, non-motorized activities are less expensive than motorized activities and are therefore more accessible to people of all ages and races, both male and female, and from various income classes. According to Power Sports Guide, the average price of a snowmobile is \$13,500. This price is prohibitive to many and certainly not available to lower income recreationists. Furthermore, the outsized impacts of motorized over-snow-vehicle (OSV) use are well documented, including impacts to wildlife, solitude, natural soundscapes, watersheds, air quality, climate, and of course other recreational uses in the same area (where one person on a snowmobile can adversely impact the experience of hundreds of other users).

Silent Tracks does **not** support the “Blended” Alternative B, as presented. We are concerned that Alternative B does not adequately address the complexity of the issues and the desires of most of the GMUG users, the human-powered recreationists. In particular, our many concerns include: 1) the proposed winter ROS allocations and their impact on site-specific winter travel management; 2) recommended wilderness; 3) protection of wildlife habitat, 4) special management areas, 5) drones, 6) climate change, and 7) timber production.

Additionally, the GMUG should consider a more comprehensive socioeconomic analysis of the importance of recreation on local economies and the reasons why people choose to recreate here (scenery, wildlife, opportunity for solitude, trails) and use these as one of the bases for Desired Conditions. These conditions can be maintained for the long-term by utilizing the more conservative management tools such as wilderness, wildlife management and special management areas, less timber production, and non-motorized ROS settings.

When the current Forest Plan was adopted almost 40 years ago, the technology did not exist for recreationists to travel deep into the backcountry on OSVs; there were no drones, very few mountain bikes, and concepts like ‘geotagging’ and ‘Instagram’ did not yet exist. We urge the Forest Service to make decisions from a long-term perspective and to “err” on the side of caution/conservation, because we can assume population pressures will grow, use of public lands will increase, and technology will change in the future. Silent Tracks urges the Forest Service to adopt a Revised Plan that will preserve the GMUG’s unique natural wonders, wildlife, and quiet places with opportunities for solitude and manage these lands as precious assets for the greatest number of people for the longest amount of time.

Basing long-term land management planning decisions on data, trends, and future conditions is vital. According to Mary Wagner, Associate Chief of U.S. Forest Service, "Outdoor recreation is by far the single greatest use of the National Forest System, dwarfing every other use." National forests and grasslands received 168 million visits in 2020 – an increase of 18 million when compared to 2019” (USFS, 2021). Recreation use on public lands, including the Gunnison Basin (Stach, 2021), has increased dramatically throughout the Covid-19 pandemic, as people seek venues where they can be outdoors and socially distanced. Most land managers we have talked to do not believe this is a temporary glitch, but rather a long-term trend. User data trends should be considered as the Revised Plan evolves to meet the persisting and changing needs of diverse user groups, including those with lower household incomes.

Silent Tracks Board of Directors

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## 1 PARTNERSHIPS AND COORDINATION (PART)

FW-DC-PART-01 in the Revised Plan states the GMUG seeks partnerships with government agencies, universities, and non-governmental organizations. Management approaches should include stewardship projects or activities that engage communities or groups on shared stewardship of public lands, including citizen science monitoring.

A Revised Plan that is proactive and addresses trends such as increased usage, parking lot issues, population growth and demographics, changing technology and equipment, and the impacts of climate change is more beneficial than one that is reactive. Thus, the management goals should also address or improve current conditions, not just focus on preventing future degradation of current conditions. Two existing citizen science-based projects collect data on current conditions which could be used to facilitate stewardship (FW-DC-PART-01) in accordance with management approaches and would be beneficial in the land management decision-making process.

### 1.1 Winter Data Collection Initiative (Winter DCI)

One study of specific interest to the GMUG is the Winter Data Collection Initiative (Winter DCI). This study is an ongoing, multi-year study conducted by graduate students in the Master's in Environmental Management (MEM) program at Western Colorado University (WCU). Students have collected and analyzed infrared sensor data at six trailheads in the Crested Butte area for four consecutive winters to date (Shaw, 2018, Cox et al., 2019, Armstrong, 2020, Stach, 2021a and 2021b). A pilot program was conducted by WCU student Brian Lieberman in the winter of 2016-17 (Lieberman, 2017). However, since the data were collected at just the Slate River trailhead, the pilot project data are not included in the summary table below. The data are unbiased and were collected and analyzed independently. The program has been funded by grants from the Town of Crested Butte, the Community Foundation of the Gunnison Valley, matching donations from Silent Tracks and other donors, and in-kind donations from WCU.

As noted above (USFS, 2021), recreation use is increasing nationwide, and most activities are non-motorized. The data collected in the Winter DCI provide site-specific user information and augments NVUM monitoring data (FW-DC-REC-01, Q1). The Winter DCI data would also provide site specific data to aid in the allocation of winter ROS settings and for implementing (FW-GDL-REC-15, FW-GDL-REC-16).

The data collected to date reveal winter visits trends are variable between 2017 through 2020 (Table 1 below). The variations are due in part to differences in the number of days of data collected, weather and avalanche conditions, COVID-19 closures, and equipment theft and malfunctions, etc. More than 119,600 winter visits have been documented to date (Stach, 2021b).

However, in the winter of 2020-21 all six trailheads in the CB area showed significant increases over the prior 3 years. In fact, the number of visits last winter was nearly double the number of visits recorded in the prior two years (Table 1).

As shown in Table 2 below, over 44,250 recreation visits were recorded by infrared motion detectors at the six winter trailheads around Crested Butte in the winter of 2020-21 (Stach, 2021). Almost 70 percent of the winter visits in the Crested Butte area last winter were non-motorized (human-powered), compared to 26% motorized, 4% hybrid, and 2% mechanized. The busiest trailhead was the Snodgrass/Gothic Corridor which, when combined, had nearly 15,000 visits! Excluding the predominantly motorized winter trailhead at Kebler Pass, **over 90 percent** of the visits at the remaining trailheads in the Crested Butte area were non-motorized.

**Table 1. Summary of winter use data collected at the six trailheads in the Crested Butte area over the past 4 years.**

Trailhead	2017-18	2018-19	2019-20	2020-21	TOTAL
Brush Creek TH	1,388	911	979	1,998	5,276
Brush Creek RD	538	*	*	1,542	2,080
Cement Creek	780	2,523	2,418	4,615	10,336
Gothic Corridor	3,427	3,132	2,402	4,445	13,406
Snodgrass	5,776	5,203	3,661*	10,364	25,004
Washington Gulch	4,355	2,450	2,532	4,781	14,118
Slate River	4,130	4,042	2,880	4,726	15,778
Kebler Pass	5,687	7,064	9,108	11,822	33,681
<b>TOTAL</b>	<b>26,081</b>	<b>25,325</b>	<b>23,980</b>	<b>44,293</b>	<b>119,679</b>

Source: Adapted from Stach (2021b), Armstrong (2020), Cox et al. (2019), Shaw (2018).

\* The infrared camera at the Snodgrass trailhead was stolen in 2019/20. As a result, there were only 58 days of data collected, so the actual number of total visits was much higher.

**Table 2. Days with data, total visits, and type of use by trailhead in the winter of 2020/2021.**

Trailhead	Days with Data	Total Users	Non-motorized	Motorized	Hybrid	Mechanized
Brush Creek TH	134	1,998	1,974	1	0	23
Brush Creek RD	89	1,542	1,473	22	17	30
Cement Creek	134	4,615	3,777	595	71	172
Gothic	129	4,445	4,113	47	9	276
Snodgrass	126	10,364	9,968	14	3	379
Washington Gulch	131	4,781	4,120	383	242	36
Slate River	130	4,726	3,919	101	656	50
Kebler Pass	116	11,822	504	10,499	768	51
Totals	989	44,293	29,848	11,662	1,766	1,017

Source: Stach (2021a).

The Winter DCI has also conducted online surveys that show user concerns about winter trailhead parking issues and visitor experience (FW-DC-REC-02, pg. 60). Last winter 75 percent of the 143 respondents (primarily local residents) said trailhead parking and/or traffic negatively affected their backcountry experience, followed by a sense of crowdedness at trailheads. Survey participants suggested improvements were to add more parking spaces and provide bags to clean up after pets. Additionally, 53 percent noted, “More drainages encouraging motorized access” would detract from their experience.

## 1.2 Recreational Impact Monitoring System (RIMS)

Another useful resource related to citizen science (FW-DC-PART-01) and stewardship monitoring is the RIMS Mobile App which was developed locally by the Colorado Mountain Club. The app is free and easy-to-use. It is a powerful tool for data collection and analysis that could be used by GMUG visitors to document onsite trail conditions, campsites, and visitor use. This citizen-based app would allow backcountry users to provide data on current conditions throughout the GMUG. This would lead to improved stewardship and facilitate management by providing up to date, site specific data to enhance monitoring of roads and trails (FW-OBJ-TRLS-02); wilderness areas (MA-GDL-WLDN-11, Table 31, Q3); visitor use (FW-DC-REC-02 Table 30, Q1); and dispersed camping (FW-STND-REC-08, FW-DC-REC-01, FW-DC-REC-02, MA-OBJ-EMREC-02 (Table 30, Q3).

### 1.3 Other Comments – Partnerships

- Add, FW-OBJ-PART-XX: Within one year of completing the revised plan, complete a strategic partner assessment across the GMUG National Forests to determine the scope and scale of partnered efforts, gaps in support, and identify the needs and issues related to Forest Service capacity.
- Add, FW-OBJ-PART-XX: If a dedicated “Partnership/Stewardship Coordinator” does not exist, develop a Partnership/Stewardship Coordinator position within two years of forest plan approval to work with partners and create opportunities for collaboration and stewardship.

## 2 RECREATION (REC)

### 2.1 Winter Recreation Opportunity Spectrum (ROS) Settings and Travel Management

It is our understanding that the development of an Environmental Impact Statement (EIS) and final Winter Travel Management Plan (WTMP) for the GMUG National Forest will begin after the Final Record of Decision (ROD) is made. The Revised Plan includes winter recreation settings that will impact the WTMP process, and yet, on Pg. 72, there is no mention under Recreation – Forest Wide Guidelines of the need to develop a WTMP. The Revised Plan should state explicitly how Winter ROS and suitability criteria will inform subsequent Subpart C Winter Travel Planning. Furthermore, the Forest should commit to beginning the Subpart C process no later than one year after the signed ROD.

- Add FW-GDL-REC-XX regarding development of a WTMP.

#### 2.1.1 2015 Travel Management Rule

Under Subpart C of the Forest Service Travel Management Rule,<sup>1</sup> National Forests with adequate snowfall must designate and display on a map a system of routes and areas where over-snow vehicles (OSVs) are permitted to travel based on protection of resources and other recreational uses. Particularly where a forest has the benefit of revising its land management plan prior to making route and area designations for OSV use, the forest plan should set a framework for sustainable winter recreation and subsequent, implementation-level winter travel management planning.<sup>2</sup> This framework

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<sup>1</sup> 36 C.F.R. part 212.

<sup>2</sup> See Forest Service Manual (FSM) 7712.2 & Forest Service Handbook (FSH) 7709.55, § 11.2 (explaining that site-specific travel management decisions generally should not be made in land management plans, which are designed to provide strategic, programmatic direction).



is necessary to satisfy the 2012 planning rule requirement to develop plan components that provide for year-round sustainable recreation<sup>3</sup> and to ensure that OSV use does not threaten sensitive winter wildlife, wildlife habitat, air and water quality, and wilderness values.<sup>4</sup>

### 2.1.2 Plan components to ensure compliance with the executive order minimization criteria

We are concerned that the GMUG continually asserts that WTM has been completed on the majority of the GMUG without having ensured that previous decisions meet the minimization criteria as required in Subpart C of the Travel Management Rule (36 C.F.R. part 212). The GMUG has also failed to produce any OSVUM maps since the planning rule was revised in 2015 and, until the recent publication of the Story Map, this data was never available to the public in GIS form. WTM on the Uncompahgre and Grand Mesa simply list a few areas that are closed to OSV use without fully analyzing the remainder of the forest deemed “open to OSV” or “no restrictions.”

This “open unless closed” framework is in direct conflict with the revised Travel Management Rule. “The March 29, 2013, order requires the Agency to revise Subpart C to require, rather than provide for, designation of routes and areas where OSV use is permitted and routes and areas where OSV use is not permitted on NFS lands, consistent with EO 11644, as amended by EO 11989” (Federal Register, 2015). ***In essence, areas should be closed unless designated open to OSV use.***

The Alternative A Map (Figure 5 below) is therefore highly misleading and sets an erroneous precedent for the forest planning process and development of winter ROS maps. Until the minimization criteria have been fully applied in accordance with Subpart C, all open areas in previous travel plans should be displayed as Not Yet Analyzed.

- Add FW-STND-REC-XXX stating that all area and trail designations made through implementation-level travel planning will be located to minimize resource and wildlife impacts and conflicts with other recreational uses, in compliance with Executive Orders 11644 and 11989 and 36 C.F.R. § 212.55(b).
- Add FW-DC-REC-XXX stating the **desired future condition that management of winter motorized recreation minimizes conflicts between uses**; damage to soil, watershed, vegetation, and other national forest resources; and harassment of wildlife and disruption of wildlife habitat.

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<sup>3</sup> 36 C.F.R. § 219.10(b)(1)(i).

<sup>4</sup> See 36 C.F.R. §§ 219.8, 219.9, 219.10(b)(1)(iv) (forest plans required to provide for ecological sustainability and species diversity, and to protect the ecological and social characteristics of recommended wilderness areas).



### 2.1.3 Objective to conduct timely winter travel management planning

The Revised Plan should also include an objective to ensure timely compliance with Subpart C by conducting winter travel planning to designate particular routes and areas open to OSV use within areas suitable for motorized use within a reasonable time-frame.<sup>5</sup>

- Add, FW-OBJ-REC-XX: Winter travel management planning, per 36 C.F.R. part 212, should be initiated within a **one-year** timeframe of when the ROD is made.

The one-year timeframe is recommended, since the issues have not been addressed in decades and the number and types of winter users have changed dramatically. Priority should be given to those areas with the most use or potential for impacts or conflicts.

- Add, FW-OBJ-REC-XX: Develop an over snow vehicle use map (OSVUM) within four years of completing the revised forest plan.

### 2.1.4 Minimum snow depth and season of use

Finally, the Revised Plan should establish seasonal use restrictions and minimum snow depth levels to help ensure that OSV use occurs only when snowfall provides an adequate buffer against adverse impacts.<sup>6</sup> Particularly with climate change leading to reduced and less reliable snowpack, these represent important programmatic tools to ensure compliance with subpart C and the minimization criteria and to prevent avoidable resource damage.

The Revised Plan should also include a guideline clearly identifying a season for OSV use based on wildlife needs, water quality considerations, average snow depth figures, and other relevant information.<sup>7</sup>

- Change, From Management Approach to FW-GDL-REC-XX: For the purposes of future travel management planning for over-snow motorized vehicle use, ~~work to develop a method for identifying adequate snow depths to avoid or minimize damage to natural and cultural resources from snow machine use.~~ **the Forest Plan should specify that over-snow vehicle travel within designated areas should only be allowed when consolidated snow depth at established, representative locations, measures at least 18 inches, regardless of the date.**

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<sup>5</sup> *E.g.*, Flathead National Forest, Record of Decision for the Land Management Plan, p. 21 (committing to initiating site-specific planning within three years).

<sup>6</sup> See 36 C.F.R. § 212.81(a) (routes and areas open to OSV “where snowfall is adequate for that use to occur”).

<sup>7</sup> See 36 C.F.R. § 212.81(a) (agency may designate routes and areas by “time of year”).

## 2.1.5 Suitability determinations for OSV use

The Revised Plan should provide meaningful suitability determinations for OSV use to focus subsequent, implementation-level winter travel planning.<sup>8</sup> Suitability determinations should address both legal suitability (e.g., motorized uses are prohibited in designated wilderness) and practical suitability based on determinations of adequate snow during season of use, terrain, wildlife needs, and other conditions, desired or actual (e.g., steep slopes and windswept ridgelines, low elevation areas without adequate snowpack, areas with dense tree cover, and important habitat for wintering wildlife should be found unsuitable).

Issue 5, DEIS, Alternative A - The Revised Plan states that the “management plan in portions of the Gunnison Basin, outside of wilderness settings, would be driven largely by snow conditions and recreationists’ access and ability” (page 20). Using these criteria would prejudice the WTMP in favor of motorized use, because modern OSVs can travel nearly everywhere. A comparison of Issue 5 in the other alternatives only provides the relative percentage of each alternative’s winter ROS allocations, but does not specify the criteria used for those prescriptions. The Revised Plan should clearly state the criteria used in determining the winter ROS settings. Specifically, were the criteria mentioned above and used on Alternative A, similarly applied to the other alternatives? In addition to the descriptions provided in Tables 10-15 (Mgmt Plan), what other criteria were used?

- Add FW-GDL-REC-XXX that implementation-level route and area designations will be consistent with suitability determinations, but that OSV use will not necessarily be permitted in all suitable areas. Rather, ***suitability determinations are a starting point for conducting site-specific travel management planning.***<sup>9</sup>

Winter ROS semi-primitive motorized or non-motorized settings were allocated to large areas in the Gunnison Basin that are “not yet analyzed” on the current winter travel map (see [Recreation Story Map](#)). The GMUG should provide specific criteria and justification for how and why it has allocated these “winter ROS settings” when there is no winter travel plan for most of the Gunnison National Forest. The GMUG should also explain why the prescriptions are titled “desired ROS” settings” on the Revised Plan maps for all alternatives. They should be renamed to reflect they represent *suitability*

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<sup>8</sup> See FSH 1909.12, § 22.15 (“Plans may include suitability or non-suitability statements for uses such as . . . cross-country over-snow vehicle use . . .”).

<sup>9</sup> See FSH 1909.12, § 22.15(1) (a suitability determination “is not a commitment to allow such use but only an indication that the use might be appropriate”).

determinations and are the starting point for site-specific travel management planning, not “desired ROS,” since they were made outside of a site-specific planning process.

Table 9 (Management Plan, p 64) shows acreage numbers for desired winter ROS goals. The Final EIS and Final Plan should make clear that winter ROS settings do not preclude travel planning decisions. The final plan should explain that site-specific travel planning is needed to determine where within semi-primitive motorized, Roaded natural, and rural areas over-snow vehicle use will be allowed. Chapter 10§11.2 of the recently revised Travel Management Planning directives state “The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis.” Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. § 261.14. Given that application of the minimization criteria are not part of the process wherein ROS classifications are assigned, ROS classifications cannot serve a dual purpose as over-snow vehicle area designations.

#### *2.1.5.1 Current Conditions, Baseline Conditions, and Existing WTMP*

(Pg. 17, Draft EIS) - Elements Common to All Alternatives - 3rd Bullet, states “Plan direction is consistent with existing travel management plans, with the exception of some areas recommended as wilderness or special management areas. Site specific travel decisions needed to bring travel plans in these areas into compliance with a revised forest plan would occur subsequent to the revised forest plan decision”.

The Revised Plan says it will follow “existing” travel management decisions and modify them in the future if necessary. The problem with that is there is no WTMP for most of the Gunnison National Forest. The “Gang of Nine” documents designate winter travel areas, but they are only applicable to the area around Crested Butte (USFS, 1995a; USFS, 1995b). The rationale/justification for designating currently “not yet analyzed” areas in Gunnison National Forest that are outside the Crested Butte area as desired motorized or non-motorized winter ROS settings prior to the start of the WTM planning process is unclear.

Thus, it is vital for the GMUG to clarify and accurately define “current conditions” versus “existing conditions” versus “baseline conditions” and declare which configuration constitutes “existing travel management”. Silent Tracks is particularly perplexed by the map presented for Alternative A. A comparison of screenshots depicts the dilemma.

#### **Alternative A -Current Status, Existing Conditions, or Baseline Conditions?**

According to the Revised Plan, the “current status” is represented by the Winter Travel Map (Figure 3 screenshot below). The current FS winter travel OSV map/brochure is depicted in Figure 4 (screenshot below). As shown, the area covered by the OSV map





However, the Revised Plan 2021 Winter ROS Inventory story map screenshot (Figure 5 below) says it represents **baseline conditions** (Alt A). The text box on that map states “This is the 2021 winter ROS inventory of winter settings, which are based on travel management decisions and special use permits over the years. The 1983 forest plan had **no** ROS direction for winter settings. We consider this the baseline; Alternative B differs only slightly.” The Revised Plan map for Alternative B is shown in Figure 6 below.

Figure 5 is vastly different from Figures 3 or 4 which represent current conditions. The “not yet analyzed” gray areas in Figure 3 are changed to either motorized or non-motorized winter ROS settings in Figure 5, baseline conditions. The criteria for making these changes are not presented in the Revised Plan. In addition, data on the number of acres that were changed from “not yet analyzed” to new winter ROS settings is not presented in the Revised Plan.

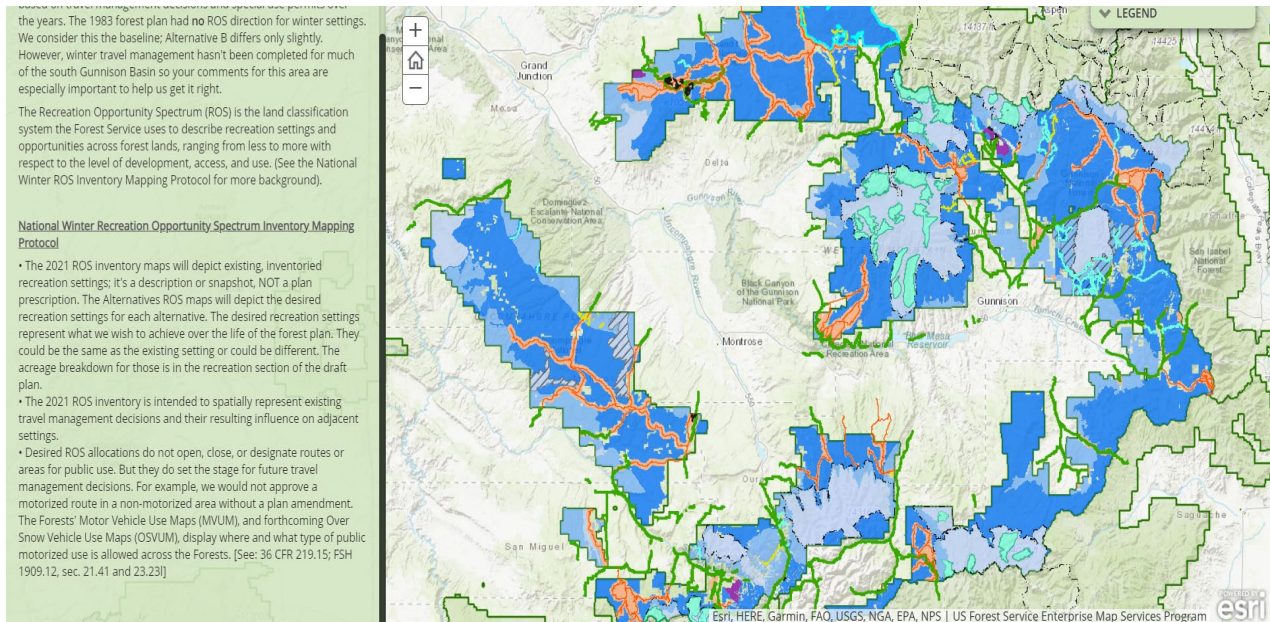
ROS settings must reflect specific suitability criteria (beyond merely existing use) AND the forest's desired conditions BUT are a baseline only and must be further refined through subsequent site-specific analysis based on thorough application of minimization criteria. Simply saying “The winter ROS percentages for alternative D are exactly opposite from alternative C” represents the “one size fits all approach” and lack of site-specific analysis and discussions that are needed to manage vast areas of public lands.

The baseline map should be one that leaves the “not yet analyzed” areas as is and converts only the previously categorized areas motorized/non-motorized/wilderness into the ROS system as they are currently designated.

Visual comparison reveals Figure 5 (Alt A, baseline) is vastly different from Figures 3 or 4 which represents “current conditions”.



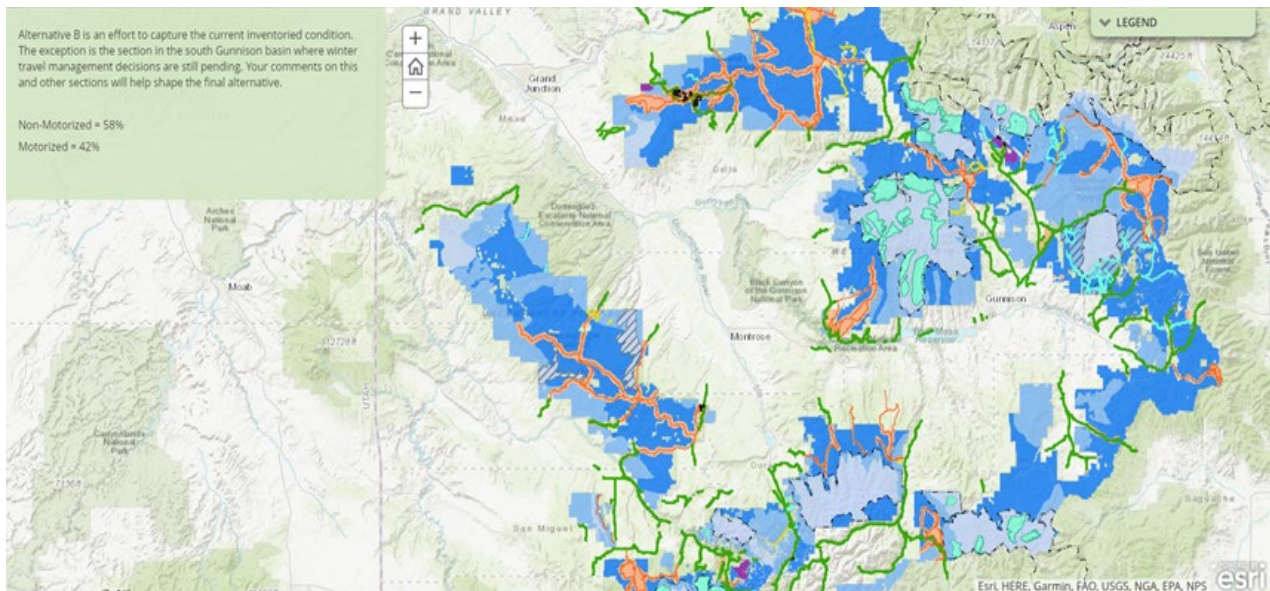
**Figure 5. Revised Plan, Story Map – 2021 Winter ROS Inventory, Alt A**



**Alternative B**

The Revised Plan proposes Alternative B (Figure 6 below) and posted a request for comments to “get it right”. Comparison of Figures 5 and 6 shows the winter ROS settings for alternatives A and B. How does this type of site-specific request not delve prematurely into the realm of the winter travel management process that the Revised Plan has repeatedly stated is “outside the scope of this document”?

**Figure 6. Revised Plan, Story Map - Alt B Desired Winter ROS Settings**



## 2.1.6 Winter-specific Recreation Opportunity Spectrum (ROS)

Since the 1991 Forest Plan did not even discuss the winter recreation opportunity spectrum, nor provide any winter ROS management direction, Silent Tracks is pleased these settings are included in the Revised Plan; however, we have serious concerns about how the settings were allocated and their potential utilization and impacts on the upcoming WTMP process.

It is a good first step that the Revised Plan has proposed winter-specific ROS classifications.<sup>10</sup> Forest visitors' experiences, expectations, and desires change in wintertime, as do the locations and distributions of recreational settings (e.g., need for more accessible front-country terrain for non-motorized users).<sup>11</sup> ROS classifications should represent desired future conditions to be achieved over the life of the plan.<sup>12</sup> However, they are still subject to further, potentially more restrictive designation through future site-specific Subpart C travel planning.

Since most of the Gunnison National Forest does not have a WTMP and the one that exists for the Crested Butte area is ineffective and outdated, the proposed winter ROS settings should be re-labeled suitability settings, not desired ROS settings.

The concept of Recreation OPPORTUNITY settings (large-scale opportunity zoning concept) differs from actual legal designations of areas and trails. A determination of suitability or an opportunity setting does not in any way preclude non-designation in the future, if site-specific analysis so warrants. In other words, there can absolutely be areas not designated for motorized use within a Semi-primitive motorized ROS zone.

- Add FW-GDL-REC-XXX stating that OSV route and area designations will be consistent with ROS classifications, but that the boundaries of OSV use will be determined through implementation-level travel planning to delineate discrete, open areas and routes within areas with motorized settings.

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<sup>10</sup> See FSH 1909.12, § 23.23a(1)(d)(1) (encouraging development of winter ROS “to depict [seasonal] changes in the location, mix, and distribution of setting attributes, access, and associated opportunities (both motorized and non-motorized)” and integrate “with other seasonally relevant multiple uses, resource values and management objectives, such as protecting crucial winter range”).

<sup>11</sup> See Flathead National Forest, Land Management Plan, p. 57 (explaining these distinctions and laying out desired winter-specific ROS settings).

<sup>12</sup> See FSH 1909.12, ch. 20, § 23.23a (repeatedly making clear that plans are to identify *desired* ROS classes).



### *2.1.6.1 ROS Settings Characteristics*

The justification for updating the maps to the new ROS settings is stated in the Revised Plan and makes sense. The conversion from wilderness area to “pristine wilderness” or “primitive” is obvious. Changing the allocations based on information presented in Tables 10-15 (Mgmt Plan) makes sense for areas that are currently (Winter Travel Map, Figure 3) designated motorized or non-motorized, but there are now additional new categories (Roaded Natural and Rural) that were not included in the 1995 Gang of Nine documents. Plus, there are new ROS allocations for all the “not yet analyzed” parcels (gray areas in Figure 3 above), which represent significant acreage.

The ROS classifications tables reflect distinct characteristics for summer and winter recreation (Tables 10-15). However, the new "size" and "remoteness" classifications in the ROS are overly restrictive and prevent landscapes with primitive or semi-primitive non-motorized character from inclusion in the setting.

This is especially important in winter when skiers should be able to access non-motorized areas adjacent to roads and trailheads. People mistakenly believe that non-motorized, non-mechanized users have reasonable access to wilderness area trails in winter simply because those areas exist. While not accurate, this assumption is often the rationale used to reject the expansion of recommended wilderness areas. Non-motorized opportunities must be provided both in appropriate remote locations AS WELL AS areas easily accessed from roads and trailheads. The GMUG must always consider the need to provide a range of opportunities, motorized and non-motorized accessible to the public.

#### *2.1.6.1.1 Pristine Wilderness ROS Settings*

##### **Table 10 (Pristine Wilderness ROS)**

- Change: Winter Characteristics lists access only “...via cross-country travel on foot and horse” – this may be confusing as [ski/snowshoe access is allowed](#).

#### *2.1.6.1.2 Primitive ROS Settings*

##### **Table 11 (Primitive ROS).**

The social encounters setting is ambitious and will likely require permitting/limiting use in popular Wilderness areas. While we are not opposed to this desired condition, the forest will need to dedicate added capacity to reach this goal.

- Add, FW-DC-REC-XX: Primitive recreation opportunity spectrum settings (summer) encompass large, wild, remote, and predominantly unmodified landscapes. Primitive settings often provide secure wildlife habitat, naturally appearing vegetation, clean water, may contain the unit’s most intact ecosystems and often coincide with designated wilderness. Primitive recreation opportunity spectrum settings contain no motorized recreation. They provide quiet solitude away from roads and people, are generally free of human development, and

facilitate self-reliance and discovery. Historic structures such as administrative ranger stations are occasionally present. Signing and other infrastructure are not prevalent and constructed of rustic, native materials.

- Add, FW-DC-REC-XX: Primitive recreation opportunity spectrum settings (winter) are large, remote, wild, and predominantly unmodified. Winter primitive recreation opportunity spectrum settings provide quiet solitude away from roads and people. There is no motorized activity and little probability of seeing other people. Constructed trails that are evident in the summer months are covered by snow, making these settings appear even more natural and untouched by human management.

#### *2.1.6.1.3 Semi-Primitive Non-Motorized ROS*

### **Table 12 (Semi-primitive non-motorized)**

Since there is no WTMP for much of the Gunnison National Forest, there are no actual “designated winter motorized routes” for those areas outside the Crested Butte area. Therefore, what is the justification for utilizing the winter description for semi-primitive non-motorized ROS setting in Table 12, page 67 to include “Remoteness: One-half mile or more from designated motorized routes and areas”.

- Change, Remoteness: Semi-primitive areas may exist in close proximity to roads and should not require a ½ mile buffer. Non-motorized users should be able to utilize roads for access and immediately enter an adjacent non-motorized area. We recommend removing the remoteness prescription.
- Add, Facilities: Rustic facilities, such as historic cabins and yurts, may exist but are rare.
- Add, FW-DC-REC-XX: Semi-primitive, non-motorized settings (summer) provide opportunities for exploration, challenge, and self-reliance in a naturally appearing landscape. Rustic structures such as signs and footbridges are occasionally present to direct use and protect the setting’s natural and cultural resources. These rustic constructed features are built from native materials or those that mimic native materials. Rustic facilities, such as backcountry cabins and yurts, may exist but are rare. These settings are free of motorized transport, but mechanized transport may be present on appropriately designed and constructed routes.
- Add, FW-DC-REC-XX: Semi-primitive, non-motorized settings (winter) provide backcountry and Nordic skiing, snowboarding, and snowshoeing opportunities. Trails are generally ungroomed and not marked for winter travel. Some areas that have enough compaction may see fat tire bike use. Rustic facilities, such as backcountry cabins and yurts, may exist but are rare. These settings are free of motorized transport, but mechanized transport may be present on appropriately designed and constructed routes.

#### 2.1.6.1.4 *Semi-Primitive Motorized ROS*

The semi-primitive motorized ROS is prescribed for several of the drainages (Slate River and Washington Gulch) in the Crested Butte area. These drainages are generally V-shaped and narrow with steep hillsides. This means all winter users, motorized, non-motorized, and mechanized share the same travel area. In many areas there may also be another category of user on these roads, motorized hybrid users who use an OSV to access more remote backcountry areas. The slopes on the sides of these drainages tend to be highly desired backcountry ski/board areas and they are close to the trailhead, making them reasonable destinations for all types of users.

**Table 13 (Semi-primitive Motorized)**

- Remoteness: Semi-primitive areas may exist in close proximity to roads and should not require a ½ mile buffer. Users should be able to utilize roads for access and immediately enter an adjacent semi-primitive area, especially in winter. We recommend removing the remoteness prescription.
- Winter Access: Ungroomed but marked over-snow vehicle routes and areas. Ungroomed ski trails. Over-snow vehicle use **only allowed** on designated routes **and in designated open areas**.
- Add, Winter Facilities: Warming huts, cabins, and rustic facilities may be present.
- Add, FW-DC-REC-XX: Semi-primitive motorized recreation opportunity spectrum settings (summer) provide motorized recreation opportunities in backcountry settings. Routes are designed for off-highway vehicles and high-clearance vehicles, including motorcycles, that connect to local communities, access key destinations and vantage points, provide short day trips on scenic loops or facilitate longer and even overnight expeditions. Visitors challenge themselves as they explore vast, rugged landscapes. Mountain bikes and other mechanized equipment may also be present. Facilities are rustic and are used to protect the setting's natural and cultural resources. Bridges are sometimes present to accommodate foot, horse, and all-terrain vehicle traffic, but are built from native or natural appearing materials that blend with the surrounding landscape and maintain the semi-primitive character of the setting. There may also be nodes that function as portals for visitors to park their all-terrain vehicles and explore adjacent semi-primitive non-motorized and primitive settings on foot. Vegetation management may be present, but does not dominate the landscape or detract from the experience of visitors traveling throughout the semi-primitive motorized setting. Occasionally, backcountry cabins or warming huts are available for short breaks or overnight use.
- Add, FW-DC-REC-XX: Semi-primitive motorized settings (winter) provide backcountry skiing and OSV opportunities. Routes are typically ungroomed but are often signed and marked. Over-snow vehicle use is **only allowed** on

designated routes and in designated open areas. Occasionally, backcountry cabins or warming huts are available for short breaks or overnight use.

#### *2.1.6.1.5 Roaded Natural ROS Settings*

Several drainages in the Crested Butte area (Kebler Pass, Cement Creek, and lower Brush Creek) are classified as Roaded Natural (RN) in the winter. These same areas may be groomed for any type of use (Table 14, Mgmt Plan), which increases the likelihood of conflicts between users. Some of the RN areas are also mapped as high recreation corridors in Alternative B since they are visited frequently for access to backcountry areas on either side of the drainages. With this scenario, these drainages in the upper Gunnison Basin could be groomed for any type of use. How will the GMUG manage user conflicts? Will every RN area allow all types of grooming all the time? Or would some areas be set aside to allow a specific type of grooming oriented to either motorized or non-motorized use? Will grooming require permitting and public comment or would every drainage allow all types of grooming as far as conditions allow? What regulation would prevent these drainages from becoming groomed for long distance, high speed OSV use, such as could occur in Cement Creek?

Additionally, Gunnison County and the Gunnison National Forest share variable jurisdictions over these roads. The Revised Plan should include information on how these variable jurisdictions will affect the implementation of the winter ROS settings. An additional concern is with plowing. If all RN areas allow plowing, xc skiing and snowshoeing would be adversely affected. Is there a guideline that states how plowing permits will be issued including opportunity for public comments or a standard that states such permitted plowing must be done in a manner that minimizes impacts to these human-powered activities - such as minimal snow cover standards?

Grooming for fat bikes/xc skiing in the Gothic Corridor (Gothic Road) and increased limited motorized access to RMBL was permitted by the BOCC resolution (2018). As more people move into more remote areas in winter and OSVs become more capable and luxurious (heated interiors, large storage, treads, not tracks), increasing numbers of homeowners will want to have motorized winter access to their properties. Is there a guideline that would preclude a commercial business or VRBO/Airbnb type business or other similar use and their clients from having the same access in this or other drainages?

Because of topography and the RN or SPM ROS settings throughout the Upper Gunnison Basin, there will be few destinations where human-powered xc skiers and snowshoers can travel without a high probability of encountering OSVs, which detracts from the quality of their experience. This is problematic since most activities on the GMUG are non-motorized and many users will be impacted.

#### **Table 14 (Roaded Natural)**

- Change, Winter Access: Over-snow vehicle use **only allowed** on designated routes **and in designated open areas**.
- Add, FW-DC-REC-XX: Roaded natural recreation opportunity spectrum settings (summer) are often referred to as frontcountry recreation areas. This setting is managed as natural appearing with nodes and corridors of development that support higher concentrations of use, user comfort, and social interaction. The road system is well defined and can typically accommodate sedan travel. Sanitation, potable water, interpretive signage, and other amenities are strategically placed to serve as destination points and portals to adjacent backcountry settings. Signage, facilities, bridges, and other infrastructure are constructed of native materials or natural appearing materials that blend with and complement the surrounding natural setting.
- Add, FW-DC-REC-XX: Roaded natural recreation opportunity spectrum settings (winter) support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates sedan travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings (primitive, semi-primitive non-motorized and semi-primitive motorized). Examples include snowmobiling, fat tire bikes, dog sledding, skiing, and snowshoeing. OSV use is **only allowed** on designated routes and **in designated open areas**.

#### 2.1.6.1.6 Rural ROS Settings

#### Table 15 (Rural)

- Change, Winter Access: Over-snow vehicle use **only allowed** on designated routes **and in designated open areas**.

## 2.2 Winter Travel Management

The text box (2021 Winter ROS Inventory tab) also states, “However, winter travel management hasn’t been completed for much of the south Gunnison Basin so your comments for this area are especially important to help us get it right.”

The GMUG is correct in stating that winter travel management has not been completed in the southern part of Gunnison Basin. It should also acknowledge that forest-wide WTM has not begun. As noted above, (pg. 72, Mgmt Plan) there is no mention under Recreation – Forest Wide Guidelines of the need to develop a WTM plan.

- Add FW-GDL-REC-XX regarding development of a WTMP.

The Revised Plan repeatedly states it will “set the stage” for winter travel management. That statement is too vague. The Revised Plan should include a detailed description of what that terminology means. As stated on page 14, “While the Plan does not address travel management, the type of planning that would designate areas or routes open or

closed and for the types of travel, the Plan recreation opportunity spectrum maps will set the stage for future project-level travel planning”. As an advocacy group representing quiet (non-motorized) recreation in the backcountry, Silent Tracks is genuinely concerned that the wording in the Revised Plan will not only direct project-level planning but gives a clear indication that any “existing documented” winter motorized use will continue.

The Revised Plan should not prejudice future site-specific winter travel so, while the Revised Plan “sets the stage”,

- Add FW-GDL-REC-XXX stating that the final winter travel management outcomes are not pre-determined.
- Add FW-GDL-REC-XXX states how the plan would be amended during the WTM process and that all stakeholders will be equitably represented throughout the process.

By mapping areas based on “current use” (Alt A / 2021 Winter ROS Inventory map that includes areas beyond Crested Butte, Figure 5 above), rather than basing settings on “actual existing” winter travel management (Winter Travel Map, Figure 3 above), this more than “sets the stage” for WTMP. Since the WTMP process has not yet begun, these allocations should not be considered “desired ROS settings” prior to any discussion with all stakeholders.

Although the Revised Plan itself does “not make travel management decisions,” Silent Tracks is concerned that the Forest Supervisor will have little discretion and stakeholders will have little influence as they work through WTM, if the proposed allocations for desired winter ROS settings mapped in the Revised Plan are adopted. Based on the generalized Revised Plan statements in Tables 149 and 150, Silent Tracks is concerned that the Revised Plan has essentially pre-determined the outcome of a WTMP.

These new “desired winter ROS settings” are being made outside the WTMP process and they have significant implications to human-powered recreationists that share Roaded areas with OSVs. Every drainage in the Crested Butte area is V-shaped with steep sides and has a road and/or river in the bottom. The road surface is where all winter users (motorized, non-motorized, hybrid, and mechanized) travel to get up the valleys. Due to terrain limitations, there are no alternative routes to separate users. There will undoubtedly be more conflicts between users as the numbers and types of uses increase in the future. Safety is a significant issue as the days of occasional OSV users passing by are long gone. Non-motorized users experience frequent encounters with OSVs on the corridors around Crested Butte.

Since the Forest Plan states that it will not shift routes that are motorized to non-motorized, WTM does not appear to be a project level process that is open for much discussion. As stated on page 350, “the biggest effect of the draft revised forest plan

program direction on recreation is that the recreation opportunity spectrum settings would be applied to project-level planning through plan direction on a Forestwide basis. This would shape management activities and public opportunities for various types of recreation over the life of the plan.”

Since most visits to the trailheads in the Crested Butte area (and forest-wide) are non-motorized, how will the GMUG implement FW-DC-REC-01 item “...1) meet persisting and evolving needs of diverse user groups”? The GMUG needs to acknowledge the persistent, ongoing, and evolving needs of the non-motorized users, who make up the majority of users, by providing access to backcountry opportunities where they can enjoy a safe and positive experience without impacts from motorized use. Based on the topography and the winter ROS maps, there does not appear to be any winter trailhead in the Crested Butte area where non-motorized users can access SPNM or pristine wilderness or primitive areas without encountering OSVs.

### 2.3 Winter Special Management Areas (Winter SMA)

One alternative for the GMUG to consider is that the main winter trailheads and drainages around Crested Butte be designated as Winter Special Management Areas: Slate River Winter SMA, Washington Gulch Winter SMA, Snodgrass/Gothic Corridor Winter SMA, Brush Creek Winter SMA, Cement Creek Winter SMA, and Kebler Pass Winter SMA. These winter SMAs would include the high recreation use drainages which are now open to motorized, hybrid, mechanized, and non-motorized use.

The Winter SMAs should specify that specific open areas and trails must ultimately be designated through Subpart C winter travel planning analysis. Just because an area has a setting of RN or Rural, based on the existence of summertime roads, should not in any way preclude the area from being excluded from OSV use designation in winter, based on site-specific analysis and application of minimization criteria. These SMAs would facilitate a more open discussion with all stakeholders on how these corridors should be managed for winter recreation.

- Add, MA-GDL-SMA-XXX stating that specific OSV open areas and trails must be designated through Subpart C winter travel planning analysis, based on site-specific analysis and meaningful application of minimization criteria.

### 2.4 Amendments to the Forest Plan

As stated on Pg. 71, Mgmt Plan, “Mapped at the national forest-scale, desired recreation opportunity spectrum settings provide desired landscape level settings to work toward and/or maintain over the life of the forest plan. However, should finer-scale analysis, public feedback, and/or place-based needs lead to a decision that is substantially or irreversibly inconsistent with the Forestwide mapped desired recreation opportunity spectrum setting allocation, the following will be done as part of that planning effort: (a) the inconsistency and rationale for deviation is documented, and if



changes are spatial, (b) the desired recreation opportunity spectrum map(s) is/are amended. The responsible official will determine whether the scale of inconsistency is of such magnitude to require a plan amendment, or an administrative map change due to mapping alterations.

Question: What are the criteria to determine if a plan amendment is required?

## 2.5 Other Comments - Recreation

- Add, the term “hybrid activities: should be defined and added to the glossary. Since hybrid activities utilize OSVs, they should be considered motorized. Hybrid use terminology should be included in the ROS tables where applicable.
- Pg. 23 - Second to last line - there is an obvious typographical error - SPNM should be changed to SPM.

### 2.5.1 Outdoor Alliance

Silent Tracks is a member of the Outdoor Alliance (OA) GMUG Working Group. In addition to the comments incorporated above, we also support the following OA recommendations.

The Revised Forest Plan should describe the different ROS classes, as well as the characteristics of different ROS settings and associated plan components to achieve the desired ROS settings. While we appreciate Tables 10-15, these tables should be translated more clearly into plan components. The GMUG Planning Team should create a new section in the Revised Plan that focuses solely on ROS and clearly identifies the plan components for each ROS setting.

Several errors and omissions that should be rectified in the release of the Final Environmental Impact Statement, including:

- The recreation opportunity spectrum (ROS) modeling data is incomplete and needs to be thoroughly reviewed and evaluated.
- The Summer ROS has not been fully modeled and Summer pristine allocations are missing from the Revised Plan.
- There are several attribution errors in the Winter ROS data:
  - Pristine Wilderness settings should be Pristine.
  - Pristine settings should be Primitive.
- Tables 10-15 should be translated into plan components.
- Revise, FW-DC-REC-01: The GMUG provides a variety of high-quality, year-round recreation opportunities across a range of resilient recreation opportunity spectrum settings—from primitive to rural, and gradients between. Recreation opportunities and facilities (1) meet persisting and evolving needs of diverse user

groups, (2) accommodate adjusted management as advancements in recreational equipment technologies make way for new and different uses, (3) are inclusive of a culturally diverse population and, (4) are accessible to persons with disabilities, wherever feasible. Unique cultural, historical, and ecological resources are featured through recreation opportunities, education, and interpretation, which connect visitors to the past, present, and future of the national forest landscapes

- Revise, FW-DC-REC-02: ~~Recreation is managed to achieve a sustainable balance with other resources values (e.g., recreation and wildlife habitat; recreation and vegetation management; recreation and timber; recreation and minerals),~~ **The recreation opportunity spectrum settings reflect the integration of Recreation is managed to achieve a sustainable balance with other resources values (e.g., recreation and wildlife habitat; recreation and vegetation management; recreation and timber; recreation and minerals), in a sustainable manner, with the desired recreation opportunities, access, facilities, and infrastructure provided within those settings.** Impacts to the social and biophysical environments from recreational use are limited, monitored, and well-managed, and recreationists consistently enjoy positive visitor experiences.
- Revise, FW-OBJ-REC-06: Within 10 years of plan approval, to reinforce **primitive and** semi-primitive non-motorized settings, eliminate at least **five** unauthorized motorized travel routes **from each setting**.
- Add, FW-OBJ-REC-XX: Through a collaborative process, develop a GMUG National Forests climbing strategy that provides guidance on rock climbing and bouldering; guidance shall address climbing in general forest and designated areas within three years of plan approval.
- Add, FW-SUIT-REC-XX: Motorized transport is not suitable in pristine, primitive, or semi-primitive non-motorized settings.
- Add, FW-STND-REC-XX: In rural, roaded natural, semi-primitive motorized recreation opportunity spectrum settings, new motorized routes and areas shall be located so the new route does not change the setting of an adjacent semi-primitive non-motorized and primitive recreation opportunity spectrum class.
- Add, FW-STND-REC-XX: New permanent motorized routes shall not be constructed, and no routes or areas shall be designated for motorized transport in semi-primitive non-motorized settings. Temporary roads for vegetation management projects, where otherwise not prohibited, may occur.
- Add, FW-DC-REC-XX: Recreation opportunity spectrum settings (All): The type and level of infrastructure, visitor services, and information are sustainable and consistent with the desired recreation opportunity spectrum settings.

### 3 HIGH PRIORITY AREA RECOMMENDATIONS FOR HUMAN-POWERED USERS- WINTER ROS MAPPING

#### Issue 5 Balance between Motorized and Non-motorized Recreation

At the recreation-focused webinar on October 19, 2021, the GMUG requested feedback on specific winter ROS allocations in the Gunnison NF to see if the winter ROS settings were “right”. While this type of request ventures into the winter travel management domain, we are simply identifying areas that are important to the non-motorized users we represent. We are providing feedback with the understanding that the final OSV trail and area designations will be determined in the upcoming WTMP process.

Our comments are focused on the Crested Butte – Gunnison Area, due to our familiarity with the area and the limited time-frame allowed in the comment period after the story maps were provided.

#### 3.1 Background

Winter recreation in the Crested Butte/Mt Crested Butte area is unique. The Town of Crested Butte is at the center of a hub of six drainages and trailheads within a few miles of its borders. The area is renowned for hosting popular backcountry events such as the Elk Mountains Grand Traverse and the Gothic Tour. This area was the epicenter of the telemark evolution and it has legendary backcountry skiing, i.e., it is a backcountry ski/board mecca. The area is appealing, in part, because of its beauty, champagne powder, lack of crowds, and proximity to the towns of Crested Butte and Mount Crested Butte.

The drainages are V-shaped, with steep hillsides and a road follows the course of the river in the valleys. In the summer, these roads extend for miles. In winter, the roads are closed to traffic and the upper valleys often have dangerous avalanche conditions, so most of the use is concentrated within about five miles from the trailheads. Due to the mountainous topography, motorized, hybrid, mechanized and non-motorized users are confined to the same narrow road corridor to access the upper valleys. There are no alternate routes up the drainages in winter, due to the narrowness of the valley, steep hillsides, and avalanche danger.

As the volume of backcountry use increases, so does the potential for conflicts and concerns for safety. All users seek powder caches and opportunities for solitude and exhilarating experiences; however, there is limited space in these narrow drainages. This is not a new development and conflicts between users were the impetus for the Gang of Nine winter travel management discussions in the early 1990s.

Every backcountry winter enthusiast knows combining motorized and non-motorized use is like mixing oil and water; they do not mix well. Shared use of an area works, until it doesn't, because too many people are vying for the same powder caches and

opportunities for solitude. However, the impacts to human-powered recreationists from winter OSV use are far greater than the other way around. The quiet, solitude and clean air so valued by skiers, snowshoers and walkers cannot be experienced when combined with OSV use. In addition, the speed at which OSVs travel turns trails into washboards and ruts, making it difficult or impossible to cross country ski. OSVs traveling fast around curves endanger skiers, snowshoers, and walkers, as well.

For example, xc skiers historically recreated on Kebler Pass Road. As OSV use in the Kebler Pass area has increased so dramatically since the 1990's, the non-motorized user's experience was negatively impacted, so human-powered use is now rare. In fact, a mere 504 visits were recorded last winter (Stach, 2021).

This video clip, [OSV Impacts on Non-Motorized Experience](#), demonstrates the impact of conflicts between motorized and non-motorized use on the quality of backcountry experiences. In many cases, the solution has been to separate users by a road such as on Rabbit Ears Pass or Vail Pass. In the Crested Butte area, separating users on either side of a road is not an option because of topography.

In prior sections of this document, we have discussed our perspectives on which map (Winter Travel Map or 2021 Winter Inventory) accurately represents baseline conditions and how that relates to suitability, so that is one issue that must be reviewed and resolved. The reason for this clarification is that “existing” conditions make a difference in WTMP. This is also pertinent because the Revised Plan states that the winter ROS settings proposed in Alt B are essentially the same as Alt A. This is concerning since the “desired winter ROS settings” should be looking forward to anticipated conditions decades in the future. While it is impossible to know what conditions will look like that far ahead, it is safe to say that with the explosion in recreation, it will be much busier than today. Technology will also continue to evolve which will give people easier access to the great outdoors.

Thus, “existing or current conditions” (Alternative A) should **not** be mapped as the “desired winter ROS settings” in the proposed Alternative B. That is a fatal flaw because they are not forward looking and do not meet persisting and evolving needs of diverse user groups (FW-DC-REC-01).

- Based on the Winter DCI data, it is ironic that motorized activities are allowed in all six drainages in the Crested Butte area and there are no opportunities for human-powered users to recreate in spaces without OSVs, especially in areas close to trailheads. Ultimately, it is up to the WTMP process to determine which drainages or areas should restrict OSVs, which should be open to OSVs, and for stakeholders to collectively figure out creative solutions that are amenable to all users. It will be painful and tedious and require compromise and respect. Those types of decisions are way beyond what is recommended here. **Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.**

## 3.2 NORTHERN GUNNISON BASIN (Included on Winter Travel Map)

### 3.2.1 Gothic Corridor (Upper and Lower East River)

#### 3.2.1.1 Upper East River

##### 3.2.1.1.1 Snodgrass Mountain

**Attraction:** summit ascent, backcountry descents back down the road or on the slopes of the mountain; periodic grooming, proximity to local communities, easy access to trail, good snow.

**Winter Use Data:** Infra-red sensor data has been collected at the Snodgrass Trailhead since the winter of 2016. It is by far the most popular non-motorized trailhead and the trend is increasing use each year. More than 10,000 visits were reported last winter. The infrared camera was stolen in 2019/20. As a result, there were only 58 days of data, so the actual number of total visits that year was much higher. Over the past four years about 97% of visits were non-motorized and 3% were mechanized.

Click [here](#) to view Existing Winter Travel Map.

**Winter ROS:** The Rural ROS setting for the Gothic Corridor/Snodgrass Mountain area is completely different from current conditions depicted in the Winter Travel Map, where OSV use was restricted to Gothic Road and they were prohibited 11/15 through 4/15, until the BOCC Resolution (2018) was amended to allow limited OSV use. The Rural ROS setting means motorized use on designated routes and areas and grooming of all types – Nordic, OSV, etc. would be allowed on all of Snodgrass and surrounding areas along part of the road to Gothic Townsite. This ROS setting is not compatible with on the ground conditions and will be problematic if OSV use is not restricted/limited to grooming machines.

Issue 8, pg. 15, DEIS: If the rural setting was allocated based on CBMR's proposed ski area expansion, it should be changed, because the expansion was denied by a categorical exclusion ruling. Furthermore, the DEIS states: "In alternatives B and D, Snodgrass is changed to General Forest (MA 5); in alternative C it is retained as the Mountain Resort Management Area (MA 4.2)."

#### **Recommendations:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A combined Snodgrass/Gothic Corridor Winter SMA would facilitate development of the WTMP.
- Snodgrass Mountain is allocated Rural ROS in the Revised Plan, all alternatives. The Rural ROS setting mapped across the entire mountain is **incorrect**. A more appropriate ROS setting would be a narrow corridor of SPM on the road to the summit of Snodgrass to allow xc ski grooming and on Teddy's Trail on the lower

flanks on eastern side for fat bike grooming. All of the surrounding areas should have SPNM settings to allow ongoing historic backcountry non-motorized use.

- Snodgrass should be MA 5, General Forest, for all alternatives.

#### *3.2.1.1.2 Gothic Road (Country Road #317)/ Schofield Pass*

Gothic Road (County Rd #317) is a County Road from the Town of Crested Butte through the Gothic Townsite. This is a high use area that is very highly valued by human-powered users. There is no alternative route for human-powered users and potential avalanche danger exists along the road.

**Attraction:** scenic tour, suitable for beginners, about 3 mi one way to Gothic Townsite, consistent snow, groomed by CBMBA since 2018. The slopes on Snodgrass between Mt CB and Gothic Townsite and on Gothic Mountain are coveted advanced backcountry ski runs.

**User Data:** Last winter 4,445 visits were recorded at the Gothic trailhead; about 92% were non-motorized, 6% were mechanized, and 1% were motorized (incl 9 hybrid users).

Click [here](#) to view Existing Winter Travel Map.

**Winter ROS:** The Gothic Road is listed as non-motorized and groomed for Nordic. This is not exactly true, since grooming by CBMBA is permitted as is limited motorized use by RMBL, and access to landowner properties up valley.

#### **Recommendations:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A combined Snodgrass/Gothic Corridor Winter SMA would facilitate development of the WTMP.
- The slopes of Snodgrass and the surrounding terrain from the Snodgrass trailhead to Schofield Pass should be SPNM as in Alternative D.

#### *3.2.1.2 Lower East River*

**Winter ROS:** The Lower East River is mapped as SPM in Alt B and SPM and portions of P in Alt D

#### **Recommendations:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- Alternative D provides non-motorized opportunities and includes primitive settings (Deer Creek Proposed Wilderness).



## 3.2.2 Slate River Drainage (Slate River, Oh be joyful, Raggeds Wilderness)

### 3.2.2.1 Slate River

**Description:** Slate River Road (CR#734) is a County Road from Gothic Road (CR#317) through the townsite of Pittsburg.

**Attraction:** Pittsburg is a popular destination for human-powered day tours and many OSV/hybrid users park there to access the Schuykill Ridge and Poverty Gulch area. These slopes are highly valued backcountry ski/board areas within a few miles of the winter trailhead. Most non-motorized users do not go beyond Pittsburg in winter (one way distance to Pittsburg is about four miles). However, the areas north of Pittsburg are utilized by hybrid skiers especially in the early winter/spring.

**Winter Use Data:** Last winter, the DCI infrared motion detection cameras recorded a total of 4,726 visits at the Slate River trailhead (Stach, 2021). 83% of the visits were non-motorized, 1% were mechanized, 2% were motorized, and 14% were hybrid.

Analysis of the past 4 years of data indicate the number of users ranged from 2,355 (2020) to 4,726 (2021) per year. The jump in use was more than double from 2020 to 2021, but Covid likely was responsible for the lower numbers in 2020.

Over the past 4 years, almost 70% of visits were non-motorized, 1% were mechanized, 15% were motorized, and 15% were hybrid. The decrease in non-motorized visits correlates with the increase in motorized visits because many people choose not to go there to avoid OSVs. **In other words, due to conflict between recreation uses, non-motorized recreationists have been displaced from this area. Subsequent site-specific travel planning must address and minimize this conflict between uses.**

Click [here](#) to view Existing Winter Travel Map

**Winter ROS:** The Slate River drainage and the surrounding hillsides are designated as SPM in Alt B and C. A portion of the road is mapped as a high use recreation area.

#### **Recommendations:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Slate River Winter SMA designation would facilitate development of the WTMP.
- The road is shared by all users from the winter trailhead to Pittsburg and there is no reasonable alternative access for non-motorized users to travel up valley. This is a high use recreation corridor and is a highly contested area that should be a priority for the WTMP process.



### *3.2.2.2 Oh-Be-Joyful*

**Winter ROS:** The Oh-Be-Joyful area and the surrounding hillsides are designated as SPM in Alt B and SPNM in Alt D. A portion of the road is also mapped as a high use recreation area.

**Recommendation:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Slate River Winter SMA designation would facilitate development of the WTMP.
- The SPNM setting for the Poverty Gulch South SMA in Alt D provides non-motorized winter opportunities.

### *3.2.2.3 Raggeds Wilderness*

**Winter ROS:** The Raggeds Wilderness area is mapped as Primitive ROS.

**Recommendation:**

- The primitive ROS setting is appropriate.

## 3.2.3 Washington Gulch

**Description:** Winter access in the Washington Gulch drainage is on Washington Gulch Road (CR #811, Road ID 7811).

**Attraction:** This is a popular xc ski and snowshoe destination, in part because of its close location to the towns of Crested Butte/Mt Crested Butte. The road is used by all types of users to access Coneys, Elkton Huts and Top of the World, Coney's and the area around the Elkton Huts offer exceptional backcountry ski terrain. The historic shortcut trail to the base of Coney's crosses private property.

**Winter Use Data:** The Winter DCI recorded 4,781 visits at this trailhead last year. Over the past 4-year period, 86% of visits were non-motorized, the balance was 1% mechanized, 8% motorized, and 5% hybrid.

**Winter ROS:** OSVs are restricted to the road in Lower Washington Gulch (USFS, 2015), which was implemented due to private landowner concerns. This road is listed as motorized, ungroomed, unmaintained. What is the basis for the RN natural area setting (FID 222)?

Click [here](#) to view Existing Winter Travel Map

## Recommendation:

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Washington Gulch Winter SMA designation would facilitate development of the WTMP.
- The SPNM setting for Coney's and surrounding area is appropriate as portrayed in Alt D.

### 3.2.4 Brush Creek (Lower/Upper East Brush Creek Middle Brush Creek, West Brush Creek)

**Description:** Brush Creek Road (CR#738) is a County Road from HW #135 to a location known as Tent City. Brush Creek Road beyond the winter trailhead is used by motorized, non-motorized, hybrid and mechanized users.

**Attraction:** This is the trailhead to the Friends Hut, a popular backcountry hut and tour destination, and part of the course for the Grand Traverse race. The route to the Friends Hut encompasses lower and upper East Brush Creek. The West Brush Creek road leads to Teocalli, Middle Brush Creek road leads to Pearl Pass.

**User Data:** The DCI collects data at both the FS winter trailhead parking and at the Veltri Ranch trailhead. Last year nearly 2,000 visits were recorded at the Brush Creek trailhead, more than double the number of visits in 2020 (979). Over the past 4 years, about 98% of visits were non-motorized, 1% were mechanized, 0.3% were motorized and 0.1% were hybrid.

## Winter ROS:

- Lower E Brush Ck - Lower portion is RN that becomes SPNM in Alt B; expanded SPNM in Alt D
- Upper E Brush Ck - SPNM in Alt B, includes proposed wilderness in Alt D
- Middle Brush Ck - lower portion is RN then becomes SPNM in Alt B
- West Brush Ck - Lower portion is RN, then becomes SPNM in Alt B

Click [here](#) to view Existing Winter Travel Map.

## Recommendations for Brush Creek Area:

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Brush Creek Winter SMA designation would facilitate development of the WTMP in all the Brush Creek drainages.

#### 3.2.4.1 Upper East Brush Creek

- Alternative D provides non-motorized opportunities and includes recommended wilderness area settings (Star Peak Proposed Wilderness).

#### 3.2.5 Kebler Pass area (Kebler East, Kebler West, Irwin, West Elk Wilderness)

**Description:** Kebler Pass (County Road 12) is a motorized hub with access to vast areas of SPM terrain.

**Attraction:** Kebler Pass typically receives early season snow. The meadows near the “Y”, Splain’s Gulch (skiers and fat bikes), Red Lady Bowl / Glades/ Redwell, and Green Lake are popular destinations for non-motorized users. Non-motorized recreation on Kebler Pass (Splain’s Gulch, “Y” meadows) occurs mostly early season, except for Red Lady, which is a highly valued backcountry ski destination all winter. Some routes on Mt Emmons end at the trailhead, some require skiing down Kebler Pass Road a couple of miles back to the trailhead. Plowing on the pass typically ends around December 1 and closes the road to vehicles.

**User Data:** Last winter the Winter DCI data show Kebler Pass had the highest number of visits (11,882) to date. In winter 2020/21, 4% of visits were non-motorized, 0.4% were mechanized, 88% were motorized, and 6% were hybrid.

Analysis of the past 4 years data reveals increasing trends in use. Total visits increased from about 5,000 in 2018 to almost 12,000 in 2021. Over the past 4 years 6% were non-motorized, 0.3% were mechanized, 85% of visits were motorized, and 7% were hybrid.

#### **Winter ROS:**

- Kebler Pass East -RN and SPM
- Kebler Pass West -RN and SPM
- Kebler Pass West Closed Area West Elk Wilderness -Pristine Wilderness and Primitive
- Irwin - RN and SPM

Click [here](#) to view Existing Winter Travel Map.

#### **Recommendations for the Kebler Pass Area:**

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Kebler Pass Winter SMA designation would facilitate development of the WTMP.

### 3.2.5.1 Kebler Pass East

- The RN setting is appropriate for the road corridor; boundaries need to be reviewed.
- Junction of Kebler Pass/Ohio Pass Road  
There should be a provision of the RN designation for seasonal grooming and short-term closure to general OSV use for a portion of parcel FID 221 near the “Y”. Specifically, the affected area is bounded by Kebler Pass Road (GC Road 12) on the north, Splain’s Gulch on the east, Country Road 7785 on the south, and Ohio Pass Road (GC Road 7730) on the west.

A general agreement has existed between the FS, the CB Nordic Council, and the motorized community that allows early season motorized use in Splain’s Gulch to access Ohio Pass, in exchange for OSVs staying off the meadows where early season Nordic grooming takes place. We recommend this agreement be formalized.

This would accommodate short-term seasonal use for the CB Nordic Council to groom early season ski tracks and host the annual Thanksgiving Camp events. The CB Nordic Council has groomed trails in this area for decades. This area gets early season snow accumulations and is a **very** desirable location for early season xc skiing. Splain’s Gulch is also used by fat bikers.

- Red Lady Bowl / Redwell – this is an extremely popular close-in backcountry ski/board destination for non-motorized users.

### 3.2.5.2 Irwin

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.

## 3.2.6 Cement Creek Area (Upper and Lower Cement Creek, Farris Creek/Strand Hill)

**Description:** Cement Creek Road (Country Road 740, Road ID 7740) has a Roded Natural ROS setting in all alternatives. The road above the winter trailhead is groomed periodically by CBMBA, it is shared by all types of users and there is no alternative trail for access up the main drainage. There are multiple areas with avalanche hazard above the road.

**Attraction:** Popular hiking and xc ski/snowshoe destinations include Walrod Gulch, Caves Trail, Middle Cement Creek Trail and Historic Pioneer Ski area. These sites are located at or down valley from the winter trailhead.

**User Data:** The Winter DCI recorded 4,615 visits at the Cement Creek trailhead last year. Over the past 4 years, 79% of visits were non-motorized, 5% were mechanized, 16% were motorized and 1% were hybrid.

## Winter ROS:

- Upper Cement Creek - RN and SPM, Double Top SMA
- Lower Cement Creek - RN and SPNM
- Farris Creek/Strand Hill - SPM

Click [here](#) to view Existing Winter Travel Map.

## Recommendations for Cement Creek Area:

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- A Cement Creek Winter SMA designation would facilitate development of the WTMP.

### *3.2.6.1 Lower Cement Creek*

- Parcels FID 778 and 526 are appropriately designated SPNM in Alts B and D to maintain a wildlife migration corridor and because the terrain is unsuitable for motorized use due to steep topography and dense tree cover.
- RN settings for Cement Creek Road are appropriate; however, the boundary of the RN area from the winter trailhead to the Narrows should be narrower and should not extend beyond the edges of the road where it is categorized as RN, because there are areas of avalanche danger and pockets of private land.

### *3.2.6.2 Farris Creek/ Strand Hill (Parcel Above CB South)*

- The wildlife management area/CO roadless area (FID 789) proposed for the parcel above CB South is appropriate, as this area is home to wintering elk and moose who would be harassed by winter motorized travel. The proposed wildlife area should be remapped as SPNM ROS in all alternatives, because of wildlife concerns and the lack of reasonable public motorized access in the winter.

## 3.2.7 Ohio Creek Drainage (Ohio Creek, West Elk Wilderness)

Click [here](#) to view Existing Winter Travel Map.

## Winter ROS

- West Elk Wilderness: Pristine Wilderness and Primitive
- Ohio Creek: RN, SPM, SPNM.

## Recommendations for Ohio Creek Area:

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.

#### *3.2.7.1 West Elk Wilderness*

- Pristine wilderness and primitive ROS settings are appropriate.

#### *3.2.7.2 Ohio Creek*

##### *3.2.7.2.1 Mill Creek*

- Mill Creek is an extremely popular xc ski and snowshoe destination. Gunnison Nordic and WCU have periodically groomed trails in this area for decades. The SPNM settings in Alternative B and D is appropriate.

##### *3.2.7.2.2 Swampy Pass*

- Swampy Pass is a popular xc ski and snowshoe destination. The SPNM and P ROS settings in Alternative D are recommended.

### 3.3 SOUTHERN GUNNISON BASIN

#### 3.3.1 Taylor Canyon / Taylor Park Area

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.

##### *3.3.1.1 Taylor Park*

- Taylor Park is an established OSV mecca with vast areas of access to SPM terrain. Alt D should be revised to more closely reflect current use in Taylor Park, as proposed in Alt B.

##### *3.3.1.2 Park Cone (FID 494)*

- Park Cone is a popular backcountry ski destination and should be SPNM as proposed in Alt B and D.

#### 3.3.2 Lower Taylor Canyon

##### *3.3.2.1 Spring Creek*

- Spring Creek is a popular xc ski and snowshoe area. SPNM settings, as proposed in Alt D provide opportunities for non-motorized use.

##### *3.3.2.2 Almont Triangle*

- The Almont Triangle should maintain seasonal winter closures for all users to minimize winter wildlife harassment.

## 4 RECREATION EMPHASIS CORRIDORS – MA 4.2 (EMREC)

Designating Recreation Emphasis “Areas” is one way for the Forest Service to address specific areas where many different recreational uses are concentrated. These areas receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable – both in terms of the public enjoying specific recreation opportunities, but also so that recreation uses do not degrade the natural environment.

Within the Revised Plan, Recreation Emphasis Corridors are too narrowly defined and focus on dispersed camping versus high use recreation areas. While we agree that the Forest Service should address the impacts of dispersed camping and responsibly manage dispersed camping activities, the Forest Service should also identify areas that receive high recreation use in winter or provide outstanding recreational opportunities.

## 5 RECOMMENDED WILDERNESS – MA 1.2 (RECWLD)

Although the 34,000 additional acres of managed recommended wilderness proposed under Alternative B is a start, it is not enough.

Silent Tracks believes the GMUG desired conditions MA-DC-WLDN-02 (pg. 81), including protecting natural areas, providing opportunities for solitude, and promoting self-reliance for future generations would be met by supporting all of the recommended wilderness additions proposed in Alternative D, a total of 216,000 new acres (Table 3, Mgmt Plan).

MA-STND-RECWLD-01 states recommended wilderness would be managed with adjacent designated wilderness. “Pre-existing non-conforming uses may continue so long as they do not impair the area’s wilderness characteristics.” Please provide examples of pre-existing non-conforming uses that would be allowed to continue and how that would be balanced with MA-DC-RECWLD-02 which says wilderness characteristics would be maintained or improved. Implementation of MA-OBJ-RECWL-03 should be sped up to prevent degradation and promote restoration.

As stated in the Revised Plan, since most of the recommended wilderness in Alternative D (92 percent) is already in Colorado roadless areas, these designations would not significantly change the management of these proposals (pg. 211, DEIS).

Silent Tracks agrees with the Gunnison County BOCC (BOCC, 2021) that the CORE Act-recommended designations for wilderness, special management, and mineral withdrawal, which were based on years of collaboration in multiple counties, should be included as part of the Preferred Alternative. The bill has passed through the House and is being considered in the Senate.



(Issue 7, pg. 14, DEIS) states that the GMUG has received four separate—but largely consistent—citizen proposals, including the Citizen Proposal, Gunnison Public Lands Initiative (GPLI) proposal for areas of Gunnison County, and the Outdoor Alliance proposal, which are applicable across much of the GMUG. The GPLI was submitted by Gunnison County, a cooperating agency for the forest plan revision and each proposal supports more wilderness (Volume 1, page 14). As mentioned in the Webinar on August 17, 2021, County support is critical for the adoption of proposals.

## 5.1 Other Comments -Recommended Wilderness

- Add, MA-DC-RECWILD-XX: Lands are managed to protect their undeveloped character, contribution to biodiversity and landscape connectivity, conservation values, and quality outdoor recreation and learning opportunities.
- Add, MA-DC-RECWILD-XX: Recommended wilderness areas appear and feel natural to visitors. They are places where natural processes dominate and they contribute to landscape scale protected networks.
- Add, MA-DC-RECWILD-XX: These areas provide visitors opportunities to explore vast areas away from the “built” civilization and experience wildness and solitude.
- Add, MA-DC-RECWILD-XX: Trailhead facilities and trail infrastructure are rustic and unobtrusive.
- Add, MA-GDL-RECWILD-XX: Management activities utilize minimal tool approach. Protect and preserve wildlife, wildlands, and biodiversity by minimizing impacts and avoiding habitat fragmentation.

## 6 TRAILS (TRLS)

- Revise FW-DC-TRLS-01: (Separate paragraph into distinct desired conditions), FW-DC-TRLS-01: A sustainable, diverse trail system is in place and maintained at least to the minimum standards appropriate for safe public access.
- Add, FW-DC-TRLS-XX: National Forest System trails support multiple recreation use types that contribute to social and economic viability in the plan area and connect established towns and developed recreation sites to the surrounding landscape with consideration for wildlife habitat and connectivity.
- Add, FW-DC-TRLS-XX: National Forest System trails are designed and maintained in a manner that ensures resource protection and facilitates positive visitor experiences. National Forest System trails accommodate a variety of use types across a variety of terrain designed for a variety of skill levels.
- Add, FW-DC-TRLS-XX: New trail development is concentrated in areas close to communities where open road and trail densities, and human activities, are already high (i.e., MA 4.2 – EMREC), and where multiple recreation use types connect established towns and developed recreation sites to the surrounding landscape. Development of stacked/looped/stacked-loop trails are considered in appropriate areas and circumstances.

- Add, FW-DC-TRLS-XX: National Forest System trails are clearly marked, particularly where routes cross ownership and jurisdiction. Trailheads adequately accommodate the levels and types of use occurring along the system within the prescribed desired recreation opportunity spectrum settings, and are adjusted based on resource needs and use demands.
- Add, FW-DC-REC-XX: Partner organizations and communities are involved in sustainable trail planning and stewardship efforts.

## 7 WILDLIFE MANAGEMENT AREA – MA 3.2 (WLDF)

### 7.1 Recreation Trail Development and Trail Density

Silent Tracks agrees with this statement: “Although public forests are governed by laws and policies of multiple use, not all areas can be simultaneously co-managed for recreation and recreation-sensitive wildlife. (Mgmt Plan, page 331).

The total proposed Wildlife Management Area acreage varies by alternative, Alternative B proposes 740,000 acres, Alternative C proposes 36,000 acres, and Alternative D proposes 621,000 acres (Table 3). While having fewer total acres, Alternative D has the greatest extent, in the Gunnison Basin many areas are replaced with recommended wilderness or SMAs. Additionally, within Wildlife Management Area boundaries, MA-STND-WLDF-02 states “*there shall be no net gain in system routes, both motorized and non-motorized, where the system route density already exceeds 1 linear mile per square mile.*”

Silent Tracks generally supports the recreation-based structure of Alternative D, as it relates to wildlife, because it seeks to balance recreation use and impacts to wildlife, is conservation oriented, and provides wildlife and wildlife habitat maximum protection through designated wilderness, wildlife management areas, and special management areas (Table 3, page 32). The Revised Plan supports this by also stating disturbance of species by management activities and recreation is managed to minimize impacts during critical life history periods (breeding, feeding, and rearing young), contributing to the persistence of the species. (Mgmt Plan, page 26).

As stated in the Revised Plan, “population growth – and all that goes with it – is the biggest single “threat” to wildlife, habitat, sensitive species and other environmental factors, and often affects how and where trails are located.” Silent Tracks supports the desired condition, MA-DC-WDLF-01, to maintain relatively unfragmented big game habitat and associated hunting opportunities in the context of increasing pressure from recreation trail development. We agree that wildlife concerns and habitat connectivity should be carefully reviewed for all future road and trail development. The desired condition (MA-DC-WLDF-01) states habitat connectivity is maintained or improved as fragmentation by routes is reduced.”

Silent Tracks recognizes that recreational trail development in the GMUG since the 1990's has been significant and that the current rate of trail development is not sustainable for the long-term. While the research on recreation impacts is extensive, its relationship to trail density is not conclusive. Silent Tracks believes there is likely a need for some type of metric on trail density in wildlife management areas, as proposed in Alternative D; however, we do not have the expertise to say what that metric should be. There are many proposed wildlife management areas we are not familiar with; however, we believe Colorado Parks and Wildlife (CPW) would be the appropriate experts to help determine whether new trails should be constructed in specific wildlife management areas.

## 7.2 Type of Recreation and Impacts on Wildlife

We acknowledge that all recreation activity affects wildlife to some degree, but not all activities have the same level of impact. As noted on Page 216, DEIS, "Impacts to Wildlife from Managing for Semi-Primitive Motorized Settings ...the introduction of motor vehicles to an area increases the potential for wildlife harassment and habitat damage substantially." Furthermore, as stated on page 218, DEIS: "Areas with greater vehicle access would have more human use, and that human use would be (on a per-capita basis) more impactful due to the ability to use vehicles to being in more of everything—more people, more dogs, more firewood, bigger tents, more food, more firearms and ammunition for target shooting, and many other impactful things."

Silent Tracks does not agree with the statement on page 349 that "wildlife needs and recreation desires would be balanced" in Alternative B. The statement that recreation impacts to wildlife would be lessened with non-motorized winter ROS settings only addresses part of the issue. Yes, non-motorized winter ROS settings would *theoretically* prevent OSV/motorized use in areas with big game; however, since most of the Gunnison National Forest does not yet have a WTM Plan for OSV travel, it is unclear how and where recreation pressure would impact wildlife, since those travel boundaries do not yet exist.

For example, moose and elk currently spend winter in motorized winter ROS settings such as the area above the Crested Butte South subdivision. To minimize these potential impacts and to protect habitat connectivity, we support the proposed wildlife management area above Crested Butte South as described in Alternative B. In addition, because of winter wildlife concerns and the lack of reasonable public motorized access to the area, it should be mapped with winter SPNM ROS settings in all alternatives.

Additionally, as innovative technologies arise, people will continue to expand into areas that were previously inaccessible in winter, so wildlife will be more vulnerable to impacts. Future generations will benefit most if the GMUG chooses long-term protective designations. Wildlife are a highly valued asset to hunters and wildlife

viewers and wildlife are an important part of the ecosystem. Their presence will become even more valued over time as the population grows.

See section Special Management Areas (MA-3.3) below for more discussion on trails and ROS settings.

### 7.3 Secure Habitat

Secure habitat, as defined on page 161, is “an area where wildlife retreat for safety when disturbance in their usual range is intensified, such as by logging activities or during hunting seasons”. We concur with CPW that it would be most beneficial to wildlife if the secure habitat areas do not allow new trails.

### 7.4 Gunnison Sage Grouse and Flat Top Wildlife Management Area

The proposed Flat Top Mountain Wildlife Management Area has the only documented sage-grouse breeding sites in the GMUG National Forests (12 lek sites). Under Alternative B, the proposed management direction for this area (approximately 23,848 acres) prohibits any new trail development (MA-STND-WLDF-02), protecting the GMUG National Forests’ most important Gunnison sage-grouse breeding habitat. This direction would maintain habitat connectivity, prevent habitat loss associated with new trails, and prevent indirect effects such as invasive plant species invasion. (DEIS, pg. 191). We also support that ‘Within the Flattop Wildlife Management Areas in the Gunnison Ranger District, there shall be no new routes.’ (pg. 93). As stated in the DEIS (pg. 190), “We (Forest Service) do not anticipate increased trail development in critical habitat.”

Silent Tracks also supports the Revised Plan Gunnison Sage Grouse Guidelines (Mgmt Plan, Pg. 36-37) which states: “FW-GDL-SPEC-43: To maintain, improve, or enhance occupied Gunnison sage-grouse habitat, surface-disturbing activities should not be permitted within 1 mile of active and inactive leks.” Silent Tracks further supports guideline FW-GDL-SPEC-44: “To minimize permanent habitat loss, new special use authorizations that entail new infrastructure development should be avoided in occupied grouse habitat. Exceptions: the right-of-way is the only reasonable access to a valid existing right, i.e., private property, water, a mineral right.”

Table 50 states that Gunnison Sage Grouse has a high or extreme vulnerability to climate change (high or very high confidence).

We support the proposal under Alternative B that states: “Standards MA-STND-WLDN-08, STND-WLDN-09, and STND-WLDN-10 would have ancillary benefits to Gunnison sage-grouse by requiring dogs to be leashed and/or under verbal control, limiting group sizes, and **prohibiting drones**. These activities, not otherwise managed, could disturb, stress, and displace sage-grouse, or in extreme cases cause sage-grouse mortality.”

## 7.5 Lynx

Winter recreation activities that cause snow compaction in lynx habitat potentially affect snowshoe hares and lynx by facilitating access to deep, snowy areas that competing predators would normally not have easy access to.

Alternative D would be the most beneficial for wildlife since there would be less motorized use and less development. As a result, there would be less wildlife harassment, lower risk of wildlife ignition, and reduced human-wildlife conflicts. Species of concern including, lynx would have more protections. We support trail development that concentrates uses in sustainable settings in areas that will not have an adverse effect on wildlife, including the Gunnison Sage Grouse.

## 8 SPECIAL MANAGEMENT AREAS (MA-3.3)

### 8.1 Suitability Settings

Silent Tracks supports the recommended wilderness areas and the “concept” of special management areas as proposed by the GPLI and presented in Alternative D. We are, however, frustrated and disappointed with the process. The Revised Plan states, “Special management areas also contain a variety of recreation and travel-related direction. These include 1) over-snow vehicle suitability; 2) motorized suitability; and 3) mechanized suitability.” Table 21 lists suitability settings for summer and winter and also lists winter ROS settings for some areas not under the jurisdiction of the Gang of Nine documents. It suggests Alternative B represents “existing conditions” and that is the “direction to retain ROS settings.” Yet, the GMUG repeatedly states the Plan does not make travel management decisions.

How will this “direction” and the pre-determined settings not prejudice equitable discussions during the WTMP process? Perusal of the working group list indicates consensus by a coalition of ten members; however, non-motorized, non-mechanized human-powered recreationists (hikers, xc skiers/snowshoers, backpackers, nature observers), who are the majority of users in the GMUG, were not directly represented.

- Add, FW-GDL-SMA-XX stating that implementation-level route and area designations will be consistent with suitability determinations, but that OSV use will not necessarily be permitted in all suitable areas. Rather, ***suitability determinations are a starting point for conducting site-specific travel management planning.***<sup>13</sup>

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<sup>13</sup> See FSH 1909.12, § 22.15(1) (a suitability determination “is not a commitment to allow such use but only an indication that the use might be appropriate”).

(Alternative D only) Table 21 states the term “limited new” indicates that specific additional trails would, subject to site-specific, subsequent environmental analysis and decisions, be appropriate”. The term “limited new” is confusing, it should be more clearly defined and specify maximum number of trails and/or maximum length of trails.

- Add, MA-STND-SMA-XXX defining maximum limits in the number and length of new trails by type of travel – motorized or mechanized, winter and summer.
- Add, MA-GDL-SMA-XXX, stating the site-specific subsequent analysis and decisions associated with “limited new” trails would be approved through the NEPA process following public comment periods.

MA-STND-WLDF-02 specifically states no new trails in the Flat Top Wildlife Management Area (Alternative B) to protect Gunnison Sage Grouse. Given the widespread and ongoing sage grouse conservation efforts, why does Table 21 (Alternative D) list “limited new” trails for the Flat Top Wildlife Conservation Area? Silent Tracks supports the Flat Top Wildlife Management Area as proposed in Alternative B, because of its added protections for Gunnison Sage Grouse.

## 8.2 Travel Management

See Section 2.3 for discussion of proposed Winter SMAs associated with WTM.

(Alternative D only) MA-SMA-OBJ-01: Waiting three years to initiate travel management to implement special management area suitability designations is too long.

- Change, MA-SMA-OBJ-01 to state WTM should begin within **one-year** of the Forest Plan ROD to establish OSV use designations and a practical OSVUM for the recreating public.

## 9 SPECIAL INTEREST AREAS (MA-2.1)

### 9.1 Gunnison Research Special Interest Area /Gothic Natural Area

The Gunnison Research Special Interest Area designation, as proposed in Alternative D acknowledges the longstanding, world-renowned ecological research that is largely administered by the Rocky Mountain Biological Laboratory (RMBL), which we support.

Alternative D includes an SMA that is unsuitable for OSV and other vehicles. While RMBL researchers do their studies mainly in the summer, it is important to maintain relatively undisturbed natural conditions year-long to produce valid research on relatively natural ecosystems. If some areas are packed down by vehicles including OSVs or some animals are disturbed by vehicle use and noise, it could create unnatural conditions that would produce unnatural results in summertime studies. A non-motorized designation is aligned with MA-DC-RNA-01 which states, “vegetation in research natural areas is in a natural condition unaltered by human activities.” The



standard MA-STND-RNA-04 also states, “To protect the Gothic Research Natural Area, camping and off-route travel is prohibited within its boundaries.”

## 10 DRONES

Silent Tracks supports the restrictions on public recreational use of drones, including no flying in wilderness, special interest areas, research natural areas, mountain resorts, recreation emphasis corridors, developed recreation sites, visitor centers, parking lots, roads and trails, and trail summits, as stated in FW-STND-REC-09. The sound and intrusive nature of drones flying overhead negatively impacts the human-powered outdoor experience.

The Revised Plan area includes several threatened species and drones can have a profound effect on wildlife as well as people. The Revised Plan states that, under Alternative B that Standards *MA-STND-WLDN-08*, *STND-WLDN-09*, and *STND-WLDN-10* would have ancillary benefits to Gunnison sage-grouse by requiring dogs to be leashed and/or under verbal control, limiting group sizes, and **prohibiting drones**. *These activities, not otherwise managed, could disturb, stress, and displace sage-grouse, or in extreme cases cause sage-grouse mortality.* There are several threatened and endangered species within the Plan area and protecting these, and other wildlife, from the stress of overhead drones is a common-sense approach.

## 11 SCENIC INTEGRITY

Silent Tracks supports managing the GMUG with high or very high scenic integrity objectives, as this is a strong contributor to tourism, the quality of the outdoor experience and economic sustainability. This is a legacy that should be preserved for future generations. As much as 70 percent of the GMUG would be managed as high or very high scenic integrity in Alternative D, which is more than double the area proposed in Alternative C.

## 12 CLIMATE CHANGE

Silent Tracks supports the Gunnison County BOCC comment (BOCC, 2021) that not enough analysis has been conducted on climate change and carbon sequestration.

## 13 TIMBER

Like the Gunnison County BOCC (BOCC, 2021), Silent Tracks is concerned about the consequences of the substantial increase of suitable timber proposed in the Plan. Alternative D includes special management areas which are excluded from timber production and are generally identified for more semi-primitive, often non-motorized recreation.



## 14 WILD AND SCENIC RIVERS

Silent Tracks supports the Wild and Scenic River protections proposed by Outdoor Alliance.

## 15 REFERENCES

- Armstrong, 2020. Upper Gunnison Valley Winter Visitor Use Report 2019-2020. [2019-2020-Winter-DCI-Report.pdf](#)
- Cox, Kendall et al., 2019. 2018-2019 Upper Gunnison Valley Winter Visitor Use Study, Monitoring and Analyzing Winter Backcountry Use. (In partnership with Silent Tracks and Share the Slate) [2018-2019 Winter DCI Report](#)
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