

Attn: Sam Staley, Forest Planner  
GMUG Forest Plan Revision Team  
2250 South Main St  
Delta, CO 81416  
Submitted Via online comment form and via email:  
samantha.j.staley@usda.gov

Dear GMUG Forest Plan Revision Team,

Thank you for the opportunity to comment on the Draft Forest Plan.

I have been backcountry skiing around Crested Butte for over 23 years. We are all well aware that the number of backcountry recreationists have increased dramatically and I have personally felt this increase during the winter months. The Winter Data Collection Initiative (an unbiased ongoing study by the graduate students at Western Colorado University) have documented this increase. Last winter alone (2020/2021) the number of winter recreationists in the drainages around Crested Butte was over 44,000. It is imperative that we manage for current, as well as the continuing increase in, numbers, in the six drainages around Crested Butte. The non-motorized community has felt this increase more than any other group because we have no quiet use drainage that provides safety, quiet and solitude that is free from noise and pollution. Slate River drainage has always been my favorite but the days of the occasional snowmobile passing are long gone. The 2020/2021 study indicated that Slate had the highest number of visitors recorded since the implementation of Western Colorado's Winter Data Collection Initiative.

Last year there were 4,804 snowmobiles (including hybrid) on the Slate. I know numerous skiers who won't even go there anymore because of the increase of snowmobiles. The six drainages around Crested Butte are: Gothic, Washington Gulch, Slate River, Kebler, Brush Creek and Cement Creek. The drainages are basically V-shaped with steep hillsides and roads and/or rivers in the bottom of the valleys. Motorized, hybrid and non-motorized users are confined to the same narrow road corridor. There are no alternate routes up the drainages in winter, due to the narrowness of the valley, steep hillsides, and avalanche danger.

Kebler is a popular motorized corridor and one that should remain so. However, the data shows that well over 90% of recreationists in the other five drainages are non-motorized. Below are two tables from the above-mentioned study. Table 1 clearly reflects the majority of winter recreationists are non-motorized. Table 2 reflects the number of recreationists the last four years.

**Table 1. 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	230
Gothic	129	4,445	4,113	47	9	276
Snodgrass	126	10,122	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
<b>Totals</b>	<b>989</b>	<b>44,051</b>	<b>29,848</b>	<b>11,662</b>	<b>1,766</b>	<b>1,075</b>

Table 1: 2020-2021 Totals, including number of days data was collected, total recreation visits, and number of visits by category for each trailhead.

Source: Adapted from Stach (2021).

**Table 2. Summary of winter use data collected in the drainages around Crested Butte area over the past 4 years.**

Trailhead	Total Users				TOTAL
	2017-18	2018-19	2019-20	2020-21	
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	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>

Table 2. Four-year comparison of total users. This table presents the total number of users in each year of the study.

It is noteworthy that Crested Butte Nordic Center provided over 500 lessons for children during the 2020/2021 winter season. These children deserve a quiet place in the backcountry to recreate that is safe from motorized vehicles and where they can appreciate the beauty and tranquility of our public lands. It is also noteworthy that the

average price of a snowmobile is \$13,500 and a high end snowmobile is up to \$18,000 (Power Sports Guide). The average cost of a pair of snowshoes is around \$120 and a full set of backcountry skis/boots/binding range from \$600 to \$1,500. And, of course, one just needs a pair of hiking boots to walk! Providing the means and affordability for a diverse clientele to access and enjoy forest service lands, should be a critical goal of the GMUG Final Forest Plan.

Since most of the Gunnison National Forest does not have a winter travel management plan 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 desired ROS settings should be determined through the upcoming WTMP process, not the Revised Plan.

I suggest that the areas around Crested Butte (Washington Gulch, Gothic/Snodgrass, Slate River, Brush Creek and Cement Creek and Kebler) be designated as Special Management Areas. This includes the winter drainages which are now open to both motorized, hybrid, and non-motorized users. The Special Management Areas designation should specify that these areas will be designated for winter recreation use during the Winter Travel Management Plan process. This designation would facilitate a more open discussion with all stakeholders on how these corridors should be managed for recreation. Keeping these areas as RN or Rural, without the Special Management designation in the Revised Plan, certainly is detrimental to the non-motorized users (over 90%) who recreate in these areas in the winter.

### Recommended Wilderness

The GMUG should protect natural areas and wildlife and opportunities for solitude for future generations by supporting all of the recommended wilderness additions proposed in Alternative D, a total of 216,000 new acres (Table 3, Forestwide comparisons). 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 (Volume 1, page 211).

### Wildlife

To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads and trails, I agree 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, within a wildlife management area boundary. Also, additions of new system routes within wildlife management areas should not cause the route density in a proposed project's zone of influence to exceed 1 linear mile per square mile.

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 (and Alternative D), the proposed management direction for that area (approximately 23,848 acres) prohibits any new trail development, protecting the GMUG National Forests' most important Gunnison sage-grouse breeding habitat. Within the Flattop Wildlife Management Areas in the Gunnison Ranger District, I agree there shall be no new routes. Also, pertaining to trail location in relation to wildlife, I agree that "The zone of influence for motorized routes is 1,000 m (0.62 mile); zone of influence for non-motorized routes is 660 m (0.41 mile) (Wisdom et al. 2018). (Land Management, page 330).

## Drones

For the safety and solitude of recreationists who enjoy our public lands and to minimize impacts to wildlife, I strongly recommend that public recreational use of drones be prohibited in areas described below. I strongly support the Draft Forest Plan language concerning drones: "Public recreational use, including launching, landing, and operating of unmanned aircraft systems shall be prohibited within MA 1.1 (Wilderness), 1.2 (Wilderness to be Analyzed), 2.1 (Special Interest Areas), 2.2 (Research Natural Areas), 4.1 (Mountain Resorts), 4.2 (Recreation Emphasis Corridors), at developed recreation sites (campgrounds, designated campsites, trailheads, visitor centers, parking lots, overlooks, day-use areas, boat launches), on Forestwide roads and trails, and at trail summits". For hikers and backpackers who walk long distances to escape noise, traffic, congestion in search of solitude and the benefits of nature, having a drone fly overhead, not only diminishes the experience, but dramatically affects the entire experience.

Thank you for your evening webinars, your expertise in answering questions and clarifying complex issues.

Maureen Hall

