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RE: GMUG Forest Plan Revision

I 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 my comments.

I do **not** support the “Blended” Alternative B, as presented. As a human-powered recreationist, I don’t feel the issues and the desires of most of the GMUG users, the human-powered recreationists, are being address adequately. I’ve expressed some of my concerns below.

I encourage the GMUG to base its land management decisions from a long-term perspective. I am a Colorado native and have lived in the Gunnison Basin since 1995. Looking back on the changes that have transpired in the past 25 years makes me realize how much conditions have changed and how much I treasure public lands. The unborn children of the future deserve places that offer solitude and beauty. I urge you to preserve the amenities that are the reasons people choose to live and/or recreate here (scenery, wildlife, opportunity for solitude, trails). These amenities will only become more precious as population pressures increase for wild places and solitude.

Cathy Frank

1 RECREATION (REC)

1.1 Winter Recreation Opportunity Spectrum (ROS) Settings and Travel Management

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 one-year timeframe to begin WTM 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-GDL-REC-XX regarding development of a WTMP.
- 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.
- Add, FW-OBJ-REC-XX: Develop an over snow vehicle use map (OSVUM) within four years of completing the revised forest plan.
- 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.
- Add FW-GDL-REC-XX: For the purposes of future travel management planning for over-snow motorized vehicle 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.

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. 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.***¹

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* 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.

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.

1.2 Current Status, Existing Conditions, or Baseline Conditions?

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.

¹ 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”).

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”.

According to the Revised Plan, the “current status” is represented by the [Winter Travel Story Map](#) . Click [here](#) to view the current FS winter travel OSV map/brochure. The area covered by the OSV map is limited to the Upper Gunnison Basin. There are vast areas of gray polygons identified as “not yet analyzed” in the Story Map.

However, the Revised Plan [2021 Winter ROS Inventory Story Map](#) 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.”

These maps are vastly different. The “not yet analyzed” gray areas in the Winter Travel Map are changed to either motorized or non-motorized winter ROS settings in the ROS inventory Map, 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.

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.

1.3 Winter-specific Recreation Opportunity Spectrum (ROS)

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.

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.

Non-motorized opportunities must be provided both in appropriate remote locations AS WELL AS areas easily accessed from roads and trailheads. The GMUG must consider the need to provide a range of opportunities, motorized and non-motorized accessible to the public.

1.3.1 Pristine Wilderness ROS Settings

Table 10 (Pristine Wilderness ROS)

- Change: Winter Characteristics lists access only "...via cross-country travel on foot and horse or [ski or snowshoe](#)

1.3.2 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.

1.3.3 Semi-Primitive Motorized ROS

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: 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.

1.3.4 Roded Natural ROS Settings

Several drainages in the Crested Butte area (Kebler Pass, Cement Creek, and lower Brush Creek) are classified as Roded 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**.

1.3.5 Rural ROS Settings

Table 15 (Rural)

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

1.4 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.

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”.

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.

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.

1.5 Winter Special Management Areas (Winter SMA)

I support Silent Tracks' suggestion to create winter special management areas (Winter SMAs for the busy Crested Butte area: 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.

1.6 Amendments to the Forest Plan, Miscellaneous

- Question: What are the criteria to determine if a plan amendment is required?
- 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.
- The Revised Plan should be forward looking and include guidance for e-bikes, the fastest growing sector of the bike industry.
- Pg. 23 - Second to last line - there is an obvious typographical error - SPNM should be changed to SPM.

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

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”. I believe this type of request ventures into the winter travel management domain.

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

2.1 Background

Winter recreation in the Crested Butte/Mt Crested Butte area is legendary. It’s an asset that shouldn’t be squandered. Why not make this a truly unique place that recognizes the amazing benefits of the area’s backcountry assets? The town of Crested Butte is at the center of a hub of multiple 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.

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.

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.

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

2.2 NORTHERN GUNNISON BASIN (Included on Winter Travel Map)

2.2.1 Gothic Corridor (Upper and Lower East River)

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.
- The slopes of Snodgrass and the surrounding terrain from the Snodgrass trailhead to Schofield Pass should be SPNM as in Alternative D.
- The non-motorized character of this corridor should be preserved, especially since there are massive developments planned for the North Village and surrounding area.

- Alternative D provides non-motorized opportunities and includes primitive settings (Deer Creek Proposed Wilderness).

2.2.2 Slate River Drainage (Slate River, Oh be joyful, Raggeds Wilderness)

Recommendations for Slate River Drainage:

- 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.
- The SPNM setting for the Poverty Gulch South SMA in Alt D provides non-motorized winter opportunities.

2.2.3 Washington Gulch

Recommendations for Washington Gulch:

- 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.

2.2.4 Brush Creek (Lower/Upper East Brush Creek Middle Brush Creek, West Brush Creek)

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

2.2.5 Kebler Pass area (Kebler East, Kebler West, Irwin, West Elk Wilderness)

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

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

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.

2.2.6.1 Farris Creek/ Strand Hill (Parcel Above CB South)

- The wildlife management area/CO roadless area (FID 789) proposed for the parcel above CB South in Alternative B is recommended, 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.

2.2.7 Ohio Creek Drainage (Ohio Creek, West Elk Wilderness)

Recommendations for Ohio Creek Area:

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- 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 are appropriate.
- Swampy Pass is a popular xc ski and snowshoe destination. The SPNM and P ROS settings in Alternative D are recommended.

2.3 SOUTHERN GUNNISON BASIN

2.3.1 Taylor Canyon / Taylor Park Area

- Final OSV use designations must be made through Subpart C travel analysis and meaningful application of minimization criteria.
- 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.
- Park Cone is a popular backcountry ski destination and should be SPNM as proposed in Alt B and D.
- Spring Creek is a popular xc ski and snowshoe area. SPNM settings, as proposed in Alt D provide opportunities for non-motorized use.
- The Almont Triangle should maintain seasonal winter closures for all user to minimize winter wildlife harassment and impacts.

3 RECOMMENDED WILDERNESS – MA 1.2 (RECWL D)

I support all the recommended wilderness areas proposed in Alternative D because of the inherent preservation of natural resources, wildlife habitat and connectivity, and opportunities for solitude.

4 TRAILS (TRLS)

Human-powered recreationists generally travel shorter distances than mechanized or motorized users. As a result, they are subject to spending more time in congested areas near trailheads that are shared by mechanized and motorized users. It makes sense to concentrate new trail development close to communities where use is high. This would allow opportunities to separate users and minimize conflict.

Studies that collect data on trail use, such as the Winter DCI, provide valuable information for stewardship and for determining trends and making decisions.

5 PARTNERSHIPS AND COORDINATION (PART)

FW-DC-PART-01 - I urge the GMUG to utilize citizen science-based projects such as the Winter DCI and RIMS to improve stewardship and facilitate decision making. A large, untapped resource available to the GMUG is senior citizens. I encourage the GMUG to find ways to engage retired persons. For example, many older people care deeply about public lands, but are no longer able to physically build trails. The GMUG should try to capitalize on their many diverse skills or knowledge instead. For example, offer opportunities to participate in citizen science stewardship or monitoring projects, trailhead education, etc.

5.1 Winter Data Collection Initiative (Winter DCI)

The Winter Data Collection Initiative (Winter DCI) 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). 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.

FW-DC-REC-01 – The Winter DCI data augments NVUM monitoring data.

FW-GDL-REC-15, FW-GDL-REC-16 - The Winter DCI data would also provide site specific data to aid in the decision making process during WTM planning.

- The data collected to date reveal winter visits trends are variable between 2017 through 2020. 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).
- The number of visits last winter was nearly double the number of visits recorded in the prior two years.
- 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, 2021b). 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 last year!

5.2 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. 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); visitor use (FW-DC-REC-02); and dispersed camping (FW-STND-REC-08, FW-DC-REC-01, FW-DC-REC-02, MA-OBJ-EMREC-02).

6 WILDLIFE MANAGEMENT AREA – MA 3.2 (WLDF)

6.1 Recreation Trail Development and Trail Density

Within wildlife management areas 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.*”

Balancing wildlife impacts and recreation desires is challenging. I generally support Alternative D, because it maintains wildlife habitat and connectivity.

The Revised Plan notes, “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.” I have no idea what an appropriate trail density value should be, and the research seems inconclusive, but I think a metric of some sort is a reasonable option that could be useful for balancing recreation and wildlife. Colorado Parks and Wildlife (CPW) would be an appropriate resource to help determine whether new trails should be constructed in the specific wildlife management areas.

There is little doubt that recreation of all types impacts wildlife, but not all activities have the same level of impact. The DEIS states “the introduction of motor vehicles to an area increases the potential for wildlife harassment and habitat damage substantially.” Furthermore, “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.”

Additionally, as new technologies arise, people will continue to expand into areas that were previously inaccessible in winter, so wildlife will be more vulnerable to impacts. Wildlife and future generations will benefit most if the GMUG chooses long-term protective designations.

6.2 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”. I concur with CPW that it would be most beneficial to wildlife if the secure habitat areas do not allow new trails.

6.3 Gunnison Sage Grouse and Flat Top Wildlife Management Area

Ongoing efforts to protect Gunnison Sage Grouse should be honored. The proposed Flat Top Mountain Wildlife Management Area has the only documented sage-grouse

breeding sites in the GMUG National Forests (12 lek sites). I support Alternative B, which prohibits any new trail development (MA-STND-WLDF-02), protecting the GMUG National Forests' most important Gunnison sage-grouse breeding habitat.

7 SPECIAL MANAGEMENT AREAS (MA-3.3)

7.1 Suitability Settings

I support the recommended wilderness areas and the “concept” of special management areas as proposed by the GPLI and presented in Alternative D. 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.”

- 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.***²

7.2 Special Area Management Prescriptions (Table 21)

(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?

² 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”).

7.2.1 Double Top SMA / Farris Creek-CB South Wildlife Management Area

I have resided in CB South since 1994 and have observed moose and elk in the proposed wildlife area above the subdivision during winter. On a literal handful of occasions in 27 years, I have observed OSV tracks in the open meadows. In every instance, the area was accessed from one of the surrounding private property parcels. However, in the past few years, OSV access from one of the surrounding private property parcels has increased.

On the ground exploration, reveals this area does not have reasonable public access and that OSV use over the past 27 years has been minimal. In many years, there was no OSV use at all. The statement in the GPLI Proposal (2019) on page 57 is flatly erroneous and should absolutely NOT be used as justification for moving the proposed Double Top SMA boundaries. *“Through community outreach, the GPLI also learned that the slopes south of Double Top and west of Point Lookout see small amounts of winter motorized use. In response, the GPLI adjusted the original SMA boundaries to exclude the area east of Strand Hill along the Farris Creek to Double Top and from there along the ridge to Point Lookout, and to the private property north of the residential area in Crested Butte South.”* This is likely based on comments from an individual(s) with private property motorized access to this parcel, not actual public use.

To minimize these potential impacts to wildlife and to protect habitat connectivity, I 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 (private property and surrounding non-motorized areas), it should more appropriately be mapped with winter SPNM ROS settings in all alternatives.

7.2.2 Poverty Gulch Protection Area

Table 21, Winter ROS -What does “existing, but turn any portions of primitive in existing into semi-primitive non-motorized” mean?

7.3 Travel Management

- See Section 1.4 for discussion of proposed Winter SMAs associated with WTM.
- 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.

8 SPECIAL INTEREST AREAS (MA-2.1)

8.1 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 I 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.”

9 DRONES

I support the proposed 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.

One of my most irritating experiences with drones occurred while I was on the summit of Crested Butte last summer. The peace and exhilaration of being on a high mountain peak was interrupted by the whirl and intrusion of a drone.

10 CLIMATE CHANGE

I am concerned about the impacts of climate change and support Gunnison County BOCC's comment (BOCC, 2021) that not enough analysis has been conducted on climate change and carbon sequestration.

Pg 98 - the Guidelines for Ski Area Management does not have any guidelines regarding the amount that local streams can be dewatered for snowmaking. In the Desired Conditions on the previous page it says maintaining the recreation values and Public Safety are priorities. Maintaining the integrity of natural processes is secondary. Climate change seems to be causing drier winters which means there is more need to make snow to keep ski areas running. Dewatering local streams to make snow has impacts far down stream. At what point does it become too ecologically disruptive to dewater streams to try to make up for less and less snow?

With regards to wildfire management, the GMU should include goals for rehabilitation after a fire. Climate trends suggest we should expect hotter and dryer climate conditions which has the potential to spark more wildfires on the forest. Given heavy fuel loads in some areas it seems like it is only a matter of time before we have to deal with a large wildfire on the forest. The GMUG should develop guidelines for the rehab of burned areas to reduce erosion, promote regrowth, protect streams and water sheds etc.

As water becomes a scarcer commodity, as a result of climate change, there will be more efforts to appropriate, capture and divert water from Forest watersheds. The revised Plan should define priorities or actions to at least carefully evaluate and oppose, if appropriate, efforts that would significantly diminish or degrade aquatic or riparian ecosystems?

Pg 118 to 127 - the comparison of environmental impacts on aquatic and riparian systems seems incomplete. It ranks alternatives based on their relative impacts. For example it simply says D has the least impact, then B has more, then C has the most impact. There is no analysis and very little description of what the actual impacts are. There should be quantitative comparisons between alternatives.

11 TIMBER

Like the Gunnison County BOCC (BOCC, 2021), I am deeply concerned about the consequences of the substantial increase of suitable timber proposed in the Plan. Increased logging, if planned and carried out responsibly, has the potential to thin out forests that have grown too close together or create breaks in vegetation that makes it harder for fire to travel long distances in contiguous vegetation. That, along with a healthy program of prescribed burning, can help us reduce our risk from wildfire. It's a complex equation, based on more than proposed numbers.

The important question is how much harvest is a sustainable yield that can be done without significantly damaging other values such as soils, wildlife, recreation, water resources etc. Those potential impacts must also be balanced against the threat of wildfire. We are in the midst of multiple years of drought and there are a lot of dry fuels on the forest floor. Climate change is definitely increasing temperatures and reducing precipitation in our area, creating conditions that make it easier for big destructive fires to get going and cover large areas.

Alternative D includes special management areas which are excluded from timber production and are generally identified for more semi-primitive, often non-motorized recreation.

Pg 73 - FW-GDL-SCNV-05 - Timber harvest activities have the potential to significantly disturb scenic quality. Timber sale guidelines should require that contractors reduce slash and leave loading pads and other high impact areas in good condition by the time they leave – not only on Concern Level 1 routes but other routes too.

Pg 76 - FW-STND-TMBR-07 - this section says that clearcutting may be used when determined by the responsible official to be the optimum method. A definition of optimum is needed.

Pg 180 - Forest Plan Objectives for Fuels - the standards for fuels reduction and Wildland Urban Interface (WUI) buffer zones should be updated to reflect the more extreme fire behavior we now see.

12 WILD AND SCENIC RIVERS

I support the Wild and Scenic River protections proposed by Outdoor Alliance.

Pg 117 – conclusions about the integrity of aquatic, riparian and wetland ecosystems does not include lakes as an aquatic component. How many acres of lakes are on the forest? How are acidity levels and water quality? How natural are biotic components? How are they impacted by recreation, sedimentation and rising water temperatures?

13 LAND CONVEYANCES

Pg 54 - FW-DC-LSU-01- Land Conveyances - Bullet 1 - says that one of the criteria that can be considered for disposing of Forest land is to support the development of affordable housing. Clearly there is a need to support affordable housing in the region, but this is a slippery slope that we shouldn't go down. This type of development also has the potential to increase the wildland urban interface exposing more residents to wildfire danger.

Pg 55 - FW_GDL-LSU-04- last Bullet - Historic access should be defended when possible. Such corridors should be proactively identified, and historic records should be compiled to be able to document historic use to make such cases easier to defend.

14 REFERENCES

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