



November 26th, 2021

Thank you for completing the important task of collecting public comment on the GMUG Forrest Plan revision. We, San Juan Hut Systems, Inc., would like to submit the following comments:

1. Northern side of Sneffels Range managed as Primitive Non-Motorized, Alt. D

We have been operating backcountry skiing and hiking huts on the northern side of the Sneffels Range for over 30 years and we hold a Special Use Permit with the Ouray Ranger District (as well as several other districts). Even before the creation of San Juan Huts, this area fostered one of the first (and likely the very first) backcountry ski hut in the state of Colorado located in Blain Basin and erected by the Lavender brothers. This area is unique in that it is largely unvisited during the winter months by motorized vehicles and it has been a sanctuary for people to experience pristine winter landscapes. A wide variety of people utilize our small simple shelters including local families, backcountry skiers from around the world, school groups, and veterans' groups. Traveling on ski or snowshoe miles beyond roads, cars, lights, and the chaos of modern life affords our guests a rare space to let their minds ease, to let life simplify to the basics of warmth, food, the necessity of transporting one's body. We ask that you ensure this sacred space persists for future generations to come by planning for it and protecting it in this Forrest Plan.

We think that Alternative D would best accomplish this goal and we urge Alternative D management be applied to the area that lies to the north and east of the existing Sneffels Wilderness Area between Last Dollar Pass and Highway 550.

It is essential that Winter Motorized Use be addressed and limited to existing roads, most similar to Alternative D. The north side of the Sneffels Range should be managed as Semi Primitive Non-Motorized. Alternative C, granting unprecedented increase in motorized use, would destroy this oasis. Alternative B is a confusing patchwork of motorized and non-motorized use that is not easily defined by significant ridges, valleys, roads, etc. Alternative B does not accurately depict current use. Currently (and historically) motorized use has been largely limited to existing summer roads. The one exception to this is the meadows directly around our Burn Hut where occasionally snowmobiles will buzz in circles around the hut. This creates a nuisance not only in noise but in a half an hour one snowmobile can destroy a weeks' worth of safe gentle skiing for 8 hut users. Additionally, recent developments on one of the two primary access roads to this area, FSR 852 / CR5, have created dangerous conditions for mixed motorized and non-motorized use and it would be unwise to encourage increased OSV use on this marginalized trail. The public has been forced off of the public (Forest Service/ County) Road into the margins of the road right-of-way. This now narrower and steeper winter trail is ripe for snowmobile/ motorized and skier/snowshoer collisions. This is especially true as this area is one of the few accessible areas for novice skiers to get out and enjoy their public lands while staying out of avalanche conditions and is frequented by skiers and snowshoers of all abilities from Ridgway, Montrose, Ouray, and beyond. The Outdoor Alliance, Ouray Backcountry Alliance, Colorado Mountain Club, and Great Old Broads for Wilderness all agree that Alternative D is the most appropriate alternative option for the North Side of the Sneffels Range.

2. Real Winter Travel Management and Winter ROS need to be completed on the GMUG

It is essential that a Winter Recreation Opportunity Spectrum be completed and completed well. Having a Forest Plan that does not address half of the year is inadequate. Having a policy that allows motorized use in any area that is not specifically designated as closed to motorized use is backwards. The Forest should be evaluated for areas that are appropriate for winter motorized use and those that are not (just as has been done for summer use) and designated accordingly. In the Recreation Opportunity Spectrum Table 14, language should be added that communicates that Over The Snow Vehicles are only permitted on designated routes and areas. Recreation Opportunity Spectrum Tables 10-15 are problematic as it is important for skiers to access non-motorized areas from trailheads. A minimum snow depth needs to be posted for all areas where OSV are permitted. There has been talk of proper Winter ROS and Winter Travel Management planning happening for over two decades at the GMUG, it is time to make this happen. Good planning is essential not only to prevent future user conflicts and to protect the forest from degradation but also because it is the law and required in Subpart C of the Travel Management Rule (36 C.F.R. part 212). Winter Travel Management should be included in this Forest Plan or at minimum an Objective should be added to this Forest Plan stating that Winter Travel Management planning will take place within one year of the completion of the Forest Plan.

3. Trail density of one linear mile per 1 square mile could have unintended consequences.

We would caution against the trail density of one linear mile per 1 square mile of trail and would suggest altering this within Alternative D. This could significantly hinder future land managers and we fear that it could have unintended consequences as the population and use on the forest increases. One linear mile of trail per square mile could be a good guiding principle but there should be areas where stacked loops or other similar trail systems are essential to keep existing trails and areas from being overrun.

4. E-Bikes are dirt bikes

We are in the bike industry and can tell you that the lines between e-bikes and dirt bikes are going to continue to blur and be very difficult to manage. We would encourage you to treat them as such and to make sure they are addressed in the new Forest Plan.

In particular, we would encourage you not to allow e-bikes on the Dallas Trail. The recent increase in bike traffic on the Dallas Trail is already evident in some erosion problems. E-bikes would exacerbate this and increase user conflict with hikers and equestrians on this trail. Trails that are suitable for dirt bikes are suitable for e-bikes.

5. Safety for recreationalists as part of logging operations

Safety for recreationalists needs to be addressed in any new logging operation in a more substantial way in Alternatives B, C, and D. We have been operating mountain bike huts that traverse the Uncompahgre Plateau since the 80's. Our huts are built of wood and we live in wood houses and are not against all logging. We do however have very real concerns about the safety of cyclists on the narrow dirt roads with the proposed increase in timber suitability found in all of the Alternative Plans. We suggest adding language that significantly reduces speed limits on these roads whenever logging operations are in place. We would also request that signs notify logging employees that cyclists frequent those roads (primarily the Divide Road). We would also request a buffer immediately around our huts for any new logging operations. These are concerns specific to the members of the public who utilize our huts but we are sure that most recreationalists would benefit from these safety measures.

Thank you for your time, consideration, and perseverance through this large project!

Sincerely,

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