

Elk Mountains Backcountry Alliance



October 30, 2023

USDA Forest Service, Rocky Mountain Region
Attn: Reviewing Officer
C/O Director of Strategic Planning
2nd floor
1617 Cole Blvd. Building 17
Lakewood, CO 80401

Submitted online at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=49606>

Re: Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision

Dear Objection Reviewing Officer

Elk Mountains Backcountry Alliance (EMBA) is a 501(c)(3) nonprofit corporation with more than 350 supporters. We rebranded from Silent Tracks in July to build more alliances and to better reflect our mission which is to “*To protect, promote, and enhance human-powered recreation in the backcountry of the Gunnison Valley.*” We represent human-powered recreationists of all ages and abilities in both summer and winter.

Our previous comments were submitted by Silent Tracks and we are filing this objection in response to our comments submitted on November 25, 2021 on the Revised Land Management Plan. The following comments are in response to the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan, Draft Record of Decision (draft ROD), and Final Environmental Impact Statement (FEIS), noticed August 31, 2023.

First, we would like to express our appreciation for the numerous allocation changes you made in your Response to Comments, Volume 3. There are several issues, both in response to our previous comments, and land management decisions in the GMUG National Forests Plan, which we support.

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OVER THE SNOW SUITABILITY

As we stated in our previous comments on November 25, 2021 (Previous Comments Pages 8, 39), “The Revised Plan should provide meaningful suitability determinations for OSV use to focus subsequent, implementation-level winter travel planning.” We are pleased that on page 35 of the Final EIS Volume 1 that you indicate “Over-snow suitability determinations were added to the ROS prescriptions, such that non-motorized classes are identified as “not suitable for over-snow vehicles” and motorized classes are identified as “suitable for over-snow vehicles... .” After receiving comments regarding over-snow-vehicle (OSV) suitability, the Forest Service clarified OSV suitability in the Winter ROS Plan direction, adjusted maps based on site-specific comments, and verified existing motorized route and area information. Travel management decisions are separate, project-level decisions (36 CFR 212) that determine the specific areas and routes for motorized recreation consistent with areas identified in the plan as suitable for motorized recreation use (36 CFR 219). Per the Draft Record of Decision, nothing in the plan’s ROS zones constitutes direction to change existing travel decisions (FSH 1909.12, Chapter 20, Section 21.41. We are pleased that OSV suitability is now included in the Final Forest Plan.

WINTER TRAVEL MANAGEMENT

The potential impact of the revised plan on future motorized and non-motorized recreation opportunities is one of the more contested aspects of the plan revision. We previously commented on adopting winter SMAs in the Crested Butte area as our concern is that the Forest Plan allocations will usurp the upcoming Winter Travel Management process (Previous Comments Page 20). We are pleased that, in several locations, the process of Winter Travel Management and project-specific travel decisions are NOT part of this Forest Plan. On page 35 of Revised Land Management Plan, it states: “While the forest plan does not address travel management, which is the type of planning and decision that would designate areas or routes open or closed and for which types of travel, the forest plan’s mapped recreation opportunity spectrum (ROS) and over-snow suitability allocations will set the stage for future project-level travel planning.” We are pleased that on page 106 #4 (MA 3.3) in Volume 3 Response to Comments it states: “This suggested prescription is already required by regulation, and would be applied forest wide as winter travel planning is conducted pursuant to Subpart C Clarification regarding the relationship of forest plan-level winter ROS and OSV suitability versus subsequent winter travel planning per Subpart C has been added to the EIS, Part II, Sustainable Recreation. Per the Draft Record of Decision, nothing in the plan’s ROS zones constitutes direction to change existing travel decisions

(FSH 1909.12, Chapter 20, Section 21.41).” The above gives us assurances that the Revised Forest Plan does not make specific travel decisions.

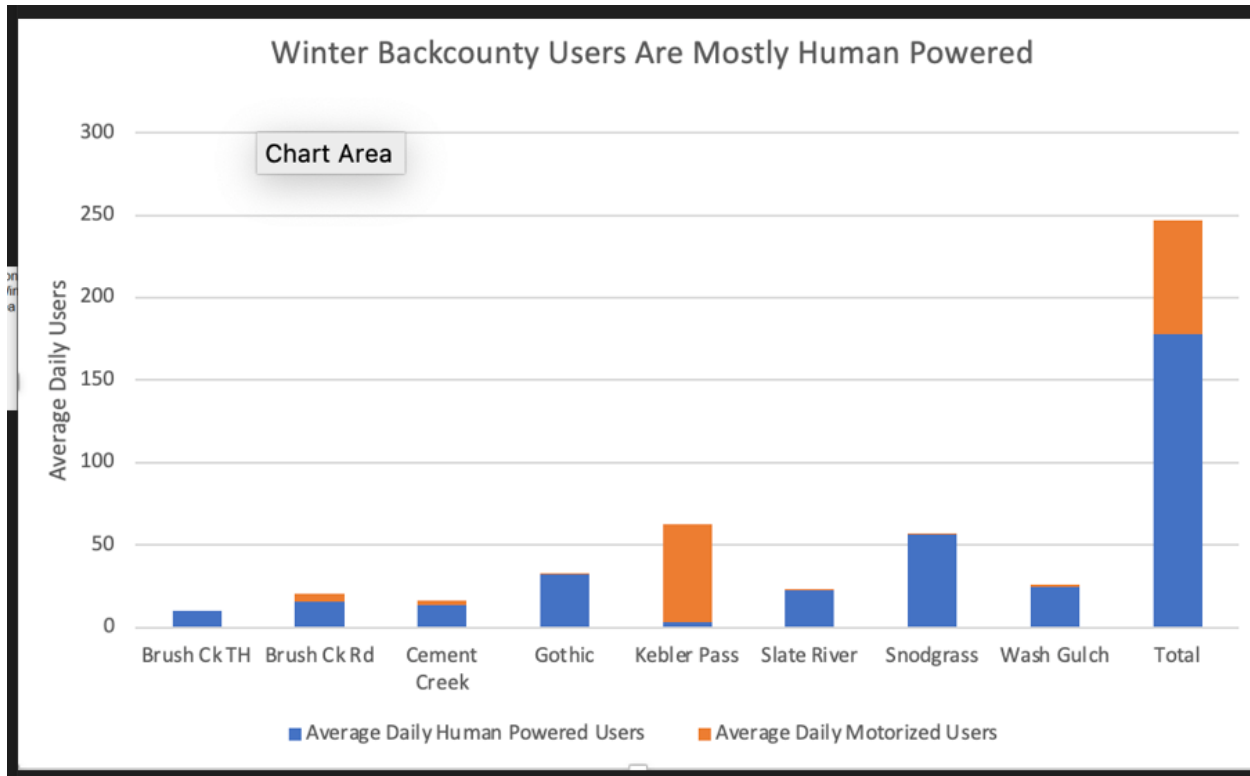
We presented documentation from the Data Collection Initiative (DCI) in our previous comments (Previous Comments Page 3). This study is an ongoing, multi-year study conducted by graduate students in the Master in Environmental Management (MEM) program at Western Colorado University. Below is an updated (2022-2023) DCI which was not yet available when we made our previous comments. The key point shown by these data is that non-motorized use is substantially greater than motorized use overall with the exception of Kebler which is predominately motorized.

2022/23 Winter Data Collection Initiative

<i>Trailhead</i>	<i>Average Daily Users</i>	<i>Average Daily Non-Motorized Users</i>	<i>Average Daily Motorized Users</i>	<i>Average Daily Mechanized Users</i>	<i>Average Daily Hybrid Users</i>
Brush Creek Trailhead	10.11	10.03	0	0.08	0
Brush Creek Road	21.77	15.74	4.93	0.31	0.79
Cement Creek	16.51	13.56	2.44	0.44	0.08
Gothic	33.5	32.1	0.3	1.05	0.06
Kebler Pass	74.62	3	59.27	0.41	11.94
Slate River	28.3	22.23	0.7	0.36	5.02
Snodgrass	57.18	56.58	0.16	0.43	0
Washington Gulch	28.01	24.59	1.61	0.23	1.59
Total	33.75	22.23	8.67	0.41	2.43

Table 2: 2022-23 averages, including total valley wide daily use and user averages by category for each trailhead.

Below is data provided by Western College University in graph form



Source: Elk Mountains Backcountry Alliance

FERRIS CREEK AREA

We would like to express our appreciation for the numerous allocation changes you made in your Response to Comments, Volume 3, especially, the Recreation Opportunity Spectrum ROS – Specific Area – winter – Crested Butte (Previous Comments Page 32). Changing the future desired Winter ROS settings to semi-primitive, non-motorized (SPNM) in the preferred alternative in the Ferris Creek area that borders Crested Butte South and Brush Creek was most welcomed! Ferris Creek is primarily accessed from Brush Creek, and as shown in Table 2, the public use in that area is predominately non-motorized and the area is hard to access with motorized OSVs. Access is poor, it is a big game winter habitat, and the polygon is isolated from any other motorized area. We appreciate the Forest Service staff visiting this area and recognizing the benefits of this new appropriate allocation.

WEST ELK WILDERNESS, SNODGRASS AND MOUNT EMMONS

We support the buffers of a SPNM designation as in Alternative D of the Winter ROS Forest Plan to the southern border of West Elk Wilderness (Burnt Mill Gulch, north of McIntosh Mountain and Poison Gulch) to protect wildlife, as there are many deer and elk are in these areas much of the winter.

For the winter ROS Preferred Alternative, we applaud the FS for designating these buffers as SPNM and support this designation for Snodgrass (Previous Comments Pages 25, 26) and on some aspects of Mount Emmons. These areas are close to population centers and are popular and safe areas for backcountry skiing and snowshoeing that have easy motor vehicle access. Since most forest users in the winter are non-motorized, these areas are very important to protect as quiet use. It is important to note that in the 22-23 winter data collection initiative graph for Kebler, the camera is set up at the actual trailhead past the parking area and thus does not capture the many backcountry skiers accessing Mount Emmons. (See further comments under Objections).

SLATE RIVER-POVERTY GULCH

Near Pittsburg, the headwaters of the Slate River, Baxter Basin, and the Mineral Point area are designated SPNM for winter ROS in the Preferred Alternative. We support this designation because it buffers the Raggeds Wilderness to the west from OSVs, protects the watershed from heavy snowmobile use, and protects the tundra on ridges that are often bare in the winter. Hybrid users can park on the road, as most do now, and ski up to backcountry ski terrain around the flanks of Schuykill Mountain, Daisy Pass and in Baxter Basin. This pristine and remote area can be enjoyed without the deep tracks and noise of OSVs, plus, the terrain here is dangerously steep to have OSVs traveling above backcountry skiers. While we agree with the designation of SPNM for winter ROS near Pittsburg in the Preferred Alternative the terrain steepens radically to the north and east of Pittsburg (Previous Comments Pages 27, 28). This area is best served as SPNM which has easy ski access from Pittsburg. We also think it is imperative to include travel by motorized over-the-snow vehicles be allowed only on designated routes and within designated areas.

THE GOTHIC DRAINAGE

We agree with the designation of SPNM in the Gothic Drainage as this area is home to Rocky Mountain Biological Laboratory and has traditionally been the only non-motorized drainage north of Round Mountain (Previous Comments Pages 17, 26, 39).

CEMENT CREEK

We agree with the SPNM designation for lower Cement Creek and the SPM designation for the upper Cement Creek (Previous Comments Page 17). Residents of Crested Butte South cross-country ski and snowshoe mostly in the lower drainage, while the upper drainage is enjoyed by OSV with access to the Taylor drainage and the White River National Forest.

OBJECTIONS

DRY BASIN

We object to the seemingly random allocation of SPM in part of Dry Basin (Previous Comments Page 26). The entire area should be SPNM due to the boundary of pristine wilderness adjacent to it on the north. Another reason to keep this area pristine and free of OSVs is that a group of Bighorn rams winters along the ridge of WSC Peak, White Mountain and the ridge to Whiterock Mountain. It is difficult to access this area with OSVs without crossing Wilderness or private property, and the designated area has no definable boundary that OSVs can recognize.

BRUSH CREEK

The Friends' Hut is located in the upper East Brush Creek nestled below Star Peak and Pearl Pass (Previous Comments Pages 17, 29, 30). Since 1984 the Friends' Hut has been accessed by skiers primarily from the Brush Creek trailhead on the Crested Butte side and from the Pearl Pass trailhead on the Aspen side. We respectfully disagree with the comments that this area has been historically motorized in the winter, especially to provide access to the White River National Forest. This is incorrect information as there has been no motorized access from Lower Brush Creek into the upper basin. The real motorized access to the WRNF is northeast of Upper East Brush Creek from the headwaters of Cement Creek, and the smaller basin where trail 400 goes over the top of Star Pass. Alternative D as depicted in the Upper Brush Creek

provides the best SPNM protection for the Friends' Hut.

The only reason for OSVs to go into the basin is to play, but they currently have the entire upper Cement Creek drainage at their disposal to do that, as it is all SPM. In fact, the Friends' Hut board has argued for 35+ years that this pristine basin should be non-motorized because of its spectacular setting and long approach for skiers. They do not want, or encourage, hybrid access to the hut. In 1995 when the Gang of Nine determined the uses for this area no one thought it would be possible that OSVs could ever access the hut. We agree with the Friends' Hut board and support the entire basin around the Friends' Hut as SPNM. Alternative D as depicted in the Upper Brush Creek provides the best SPNM protection for the Friends' Hut. As always, it makes the most sense from an enforcement as well as practical perspective to have the line between SPM and SPNM on the ridge tops as Alternative D shows in this area.

WASHINGTON GULCH

In the Gang of Nine 1995 decision, Washington Gulch was originally designated as "snowmobiles are allowed but discouraged." (Previous Comments Pages 28, 29). That vague designation was updated with a Forest Order in the early 2000's to better define what discouraged meant, but that Forest Order was meant to be a temporary fix till Winter Travel Management was addressed. Thirty years ago, the Forest Service wanted to make Washington Gulch non-motorized, but at the time there was a commercial outfitter guiding limited trips there, so hence the original designation of "allowed but discouraged." Since then, that outfitter's license was pulled for falsifying his user numbers in Washington Gulch. Since this trailhead is adjacent to a subdivision, and very limited in size, we believe that all of Washington Gulch as SPNM would best serve the community. This drainage provides easy and excellent access for backcountry skiers, cross-country skiers, and snowshoers. It is a relatively short drainage that offers limited "play" areas for OSV users, but provides easy ski-in access to Coney's, a popular backcountry ski ridge. There is also a newly purchased backcountry hut up Washington Gulch that is catering exclusively to backcountry skiers. As you can see from the 22-23 DCI just over 5% of the users in that drainage are motorized which is another reason this drainage should be as SPNM. Because the Winter Travel Management process has not commenced, 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 winter travel designations will be determined in the upcoming WTMP process.

MT. EMMONS

We believe the west SPNM delineation of Mount Emmons should extend west to the ridgeline to include all of Evans basin as that area is primarily used for backcountry skiing (Previous Comments Pages 30, 31). The random line splitting the basin between SPM and SPNM is vague, unenforceable, and would only lead to use conflicts in the future. Extending the SPNM boundary to the western ridge of Evans Basin provides a natural barrier which would eliminate gray areas and make future management easier while still providing SPM ample area for recreation. It is ideal for the areas to the west in the Kebler drainage be SPM as there are acres of play area, and access is better suited for OSVs.

DRONES

As stated in our previous comments (Previous Comments Page 41) “Silent Tracks (Now EMBA) 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. We are disappointed that that on Page 182 #2 in the Response to Comments document, it states: “Direction prohibiting drone operations from Forest-wide roads and trails has been removed, so a backcountry road pullout would be an acceptable place to operate a drone so long as other legal conditions are met.”

On page 184 #14 in Response to Comments, it states: “The new proposed direction is consistent with Forest Service and FAA guidance, provides protections specific to the GMUG NFs and its visitors, and allows for use of drones in many unpopulated areas of the Forest. Roads and trails, trail summits, and Recreation Emphasis Areas –MA 4.2 would no longer be prohibited areas to operate drones from.” The Revised Plan prohibits drones over sage grouse habitat and as stated in the Forest Plan, “*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, not just in sage grouse habitat. Please reconsider the use of drones in backcountry road pullouts.

Thank you for the opportunity to comment.

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