

Data Submitted (UTC 11): 7/29/2019 5:01:31 PM

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Comments: I am responding to your requested comments with additional detail regarding the danger of avalanches in the Lake Irwin Area. I am working to further validate this dataset with the CAIC and will provide the updated data when I have it tabulated.

Text of comment follows:

I wish to provide a tabulation of data downloaded from the Crested Butte Avalanche Center. Many thanks to them for their great work and for making their data available to the public. The following table contains avalanche statistics for regions around Crested Butte. The regions, and the types of activities allowed within them are determined by the USFS and are displayed in this map.

[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5397031.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5397031.pdf)

The following table contains counts from a 10 year period of the number of observed avalanches, and the number of people caught, buried, and killed in avalanches in the same period. It also shows the USFS designation of activity type of each area.

[https://drive.google.com/file/d/16R2\\_VoI4Z3Ca\\_IXSqjLX-svPEhNymIlp/view?usp=sharing](https://drive.google.com/file/d/16R2_VoI4Z3Ca_IXSqjLX-svPEhNymIlp/view?usp=sharing)

Observations of the data are:

1. In the last 10 years, the Irwin area has by far the largest numbers of observed avalanches at 173. Taken together with surrounding areas which include the road which accesses the Irwin area (sub-region Kebler East and Kebler West) the total number of avalanches is 341. Other areas in which snowmobiling is allowed have an avalanche count of only 71 (Slate River) and 2 (Upper Cement Creek). From these data it is clear that one of the most avalanche prone and dangerous regions is being designated and promoted for use as a snowmobiling destination.
2. In terms of avalanches in the last 10 years leading to the deaths of snowmobile riders, there have been 2 deaths in the Irwin Area (including the road), and none in the surrounding areas. Elsewhere in the county there were 2 people killed (in the upper East River) but this was not a snowmobile related accident.
3. In terms of people being caught in avalanches (some being killed and some buried) in the last 10 years there are 10 in the Irwin Area, and 7 in all the other areas combined.

The Irwin Area is clearly avalanche prone and designating this area as a state-wide snowmobiling destination is neither rational, ethical, or prudent. In order so that you may double check my tabulation, the original dataset is attached to this comment.