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Title:

Comments: Analysis of Environmental Effects of Granite Basin Wilderness

Hi Brittany,

Please find attached my document "Analysis of Environmental Effects of Granite Basin Wilderness". Would you please forward it to the Wilderness team?

At some time in the future I plan to send a revision that includes references. But the may be awhile as my partner Kathy and I are headed out for an extended camping trip to Canada and Alaska!

Thank you for all your assistance,

Bob

Introduction and Summary

The information in this paper is being provided to the GMUG Wilderness team to assist in its environmental analysis of Granite Basin for possible recommendation of wilderness designation. Granite Basin is the 9,220 acre area recommended for wilderness in the draft 2007 Forest Plan. The paper provides information on many of the facets of environmental analysis. The author would be pleased to provide additional information or clarifications as requested by GMUG.

Analysis

The analysis provided herein gives strong support to the conclusion that wilderness designation of Granite Basin would significantly benefit the National Wilderness Preservation System (NWPS).

Wilderness designation would also strongly support the natural, social, and economic sustainability of the Gunnison/Crested Butte area.

Recommendations

This author recommends that GMUG include a recommendation for Granite Basin wilderness designation in the preferred Forest Plan alternative and any other alternatives which include wilderness recommendations. Granite Basin would be a unique addition to the NWPS. It possesses highly

concentrated and undisturbed natural environment. Nearly 60 percent of Granite Basin's area consists of B1/B1 PCAs and Colorado roadless area upper tier acres. Granite Basin is in close proximity to the second largest population center in Gunnison County. Conservation and preservation of ecosystems are values widely shared by Gunnison/Crested Butte's residents and its many visitors. Designation would preserve irreplaceable natural resources and wildlife habitat and protect them from growth and development pressures.

Environmental Effects of Granite Basin Wilderness Designation

Effects on Recreation

Summer Motorized

There are no summer motorized trails in Granite Basin. No future motorized development is authorized. Wilderness designation for Granite Basin would not affect summer motorized recreation.

Summer Non-Motorized

There are 3 non-motorized trails in Granite Basin:

Granite Basin trail (3.1 mile length) has one end joining an end of Eccher Gulch Trail and the other end teeing into the Roaring Judy trail. Granite Basin is an "MB" trail, open to mountain bikes, hikers, and horses.

Eccher Gulch trail (1.0 mile length) has one end joining an end of Granite Basin trail and the other end dead-ends at private property. Eccher Gulch is an "MB" trail, open to mountain bikes, hikers, and horses.

The composite of the Granite Basin and Eccher Gulch trails is sometimes referred to as a single trail, the Granite Basin/Eccher Gulch trail (4.1 mile length). Often this name is shortened "Eccher trail".

Horse Basin trail (2.0 mile length) has one end at Forest Service road 740, Cement Creek. The other end is

internal to the GMUG forest. Horse Basin is an "HO" trail, open to horse/foot (hiker) traffic.

The Granite Basin/Eccher trail is totally screened from the Horse Basin trail, separated by Cement Mountain, its ridges, and dense forests.

Effects on Mountain Biking

Wilderness designation would terminate mountain biking on any trail in Granite Basin open to mountain bikes at the time of designation. Currently Granite Basin/Eccher Gulch trail is the only trail in Granite Basin open to mountain bikes. One new trail is proposed to provide an authorized exit from the dead- end of Eccher to state highway 135.

Closing mountain bike access to Eccher trail would have negligible effect on mountain biking recreation in the Crested Butte/Gunnison area. This assessment is based on the following specific findings.

Miles of mountain bike trails

The Granite Basin/Eccher Gulch trail is 4.1 miles long. The Crested Butte/Gunnison area contains 750 miles of single-track trails open to mountain biking. On the basis of miles of trail, closing the Eccher trail would reduce the size of the mountain biking network by a negligible amount, one half of one percent.

Usage of Granite Basin/Eccher trail for mountain biking

Eighty-two hours of observations of the Granite Basin/Eccher trail by this author showed very low usage by mountain bikers. Projected to a seasonal basis, the observations predict 195 uses in a 5 month season.

A recent study sponsored by the Outdoor Alliance found that total annual mountain biking "visits" to the Crested Butte/Gunnison area is 53,690 visits per year. (A mountain biking visit consists of at least one bike ride). Granite Basin/Eccher trail's 195 bike rides per season which is less than four tenths of one percent of the total annual number of mountain bike rides in the Crested Butte/Gunnison area.

Based on use, closing the Eccher trail would have negligible effect on mountain biking recreation in the Gunnison/Crested Butte area.

Trail Characteristics

Loops - The desirability of loops without traveling on roads is a major GMUG finding documented in the 2010 Travel Management Final Environmental Impact Statement [ref TBS]. Mountain bike users desire looped routes where bikers can ride for varying distances (5-25 miles) on trails rather than roads. Any loop containing the Granite Basin/Eccher trails requires a 6 mile ride on Jack's Cabin Cutoff road and state highway 135. A loop using Deadman trail requires 8 miles on roads. A loop using Rosebud trail requires 16 miles on roads. The only alternative is a shuttle. Granite Basin/Eccher trail does not possess the desired loop topology.

Technical Trails - Granite Basin/Eccher is a not a technical trail. CBMBA has said that "there is a call for downhill specific technical trails." One knowledgeable commenter [ref TBS] offered the opinion that "More bike trails should be flow trails. Trails with berms and rollers and jumps. This is happening everywhere and the birthplace of mountain biking is falling behind."

The Granite Basin/Eccher trail does not have characteristics that provide mountain bikers with a high quality riding experience. Closing the trail to mountain biking would have negligible effect on the quality of mountain biking in the Crested Butte area.

Other considerations for mountain biking

Visiting mountain bikers - Granite Basin/Eccher Gulch is known as a locals' trail. [ref TBS] It is rarely (never?) mentioned in trail guides or promotional material that advertises Crested Butte mountain biking. Closing the trail to mountain bikes would have no effect on visitors' mountain biking experiences.

Alternative trail - A well-recognized local expert on Crested Butte mountain bike trails (and author of a popular Crested Butte mountain bike trail guide) recommends a loop alternative to the Granite Basin/Eccher Trail. Her loop starts and ends on Jack's Cabin road, uses Powder Cache and Roaring Judy high clearance Forest Service roads, and includes the Roaring Judy trail downhill. This loop runs along the eastern border of Granite Basin and connects with the Granite Basin/Eccher trail. The loop is totally outside of the 9,220 acre Granite Basin area and would not be closed with wilderness designation.

GMUG has indicated that when one trail is closed to mountain bikers its former users find other trails to ride. In this case an alternative trail is in exactly the same area as the original trail.

Effects on Hiking

Wilderness designation for Granite Basin would improve the availability high quality hiking recreation close to local communities. It would convert the mechanized Granite Basin/Eccher Gulch trail to a hiker/horse trail.

The preferred alternative in the 2009 Gunnison Basin Travel Management DEIS included the closure of the Granite Basin/Eccher Gulch trail to mountain biking. The DEIS stated that "The conversion of these trails from mountain bike use to hiker/horse use would help meet the need for more hiker/horse trails

outside of Wilderness and close to residential areas and local communities." There is only one existing hiker/horse trail, Horse Basin in the Crested Butte area. All other trails are motorized or mechanized.

Hiker/Horse trails provide a prime recreation experience for hikers. Prime experience was defined in the 2006 Comprehensive Assessment, Chapter 2 Recreation, as shown below. [ref TBS]

Table 3 from the 2006 Comprehensive Assessment

Closing of the Granite Basin/Eccher trail to bike use would increase hikers' prime experience options from 2 miles to 6 miles. Additionally, Granite Basin provides access to the northern spur of the Granite Basin trail, decommissioned in 2010. This spur provides hiker access to the now closed Pioneer Ski hiker/horse trail and the user-created Kathy's Trail thus providing a connection to Cement Creek Road. Converting Granite Basin/Eccher to hiker/horse would create a prime quality 9 mile network of hiking trails, using current and former system trails and trails users have created over many years. The network would provide a 7 mile thru-hike with a short 4 mile shuttle.

The Travel Management DEIS mentioned another value of converting bike trails to hiker/horse: "The conversion of mountain bike trails to hiker/horse trails would also alleviate user density and conflict issues and allow hikers and horse users to enjoy their experience without having to step off the trail multiple times to allow mountain bikers to pass." This is true statement in general but with Granite Basin/Eccher trail's very low usage by mountain bikers, encounters between hikers and bikers is very

rare. Similarly, reducing conflicts and improving safety, another value of conversion, is not a high priority for the Granite/Basin Eccher trail.

Even with low bike usage, hikers have noticed downhill sections of the Granite Basin/Eccher trail with significant ruts where bikers brake heavily and where some bikers enjoy shredding up rooster tails on turns. Conversion to a hiker trail would reduce damage and the need for difficult trail repairs.

Effects on Hunting

Hunters support Wilderness designation for Granite Basin.

The Gunnison Wildlife Association (GWA) is Gunnison County's principle advocate for hunters and wildlife enthusiasts, advocating for management and conservation of public lands. Andy Cochran, the President of GWA, stated in a comment to GMUG [ref TBS]:

"Gunnison Wildlife Association (GWA) supports the 2007 wilderness recommendation for Granite Basin roadless area. It is our belief that this area holds true wilderness characteristics."

"GWA supports more wilderness designation within the GMUG Forest. We also support areas that provide more solitude for wildlife. Wildlife needs more unfragmented habitat for survival"

Wilderness designation for Granite Basin will eliminate mountain biking activity from the Eccher trail and other trails proposed for the area, providing more solitude for wildlife.

Several individual hunters submitted comments to GMUG supporting Wilderness for Granite Basin.

Colorado Parks and Wildlife, Colorado's state organization for Wildlife Management and Hunting, submitted a comment [ref TBS] stating that no new routes of any kind should be built in the Almont Triangle Corridor, "one of the most critical wildlife migration corridors for deer, elk, and bighorn sheep in the Gunnison Basin". This area serves as a documented pinchpoint for ungulates movements to

critical winter ranges to the south" Granite Basin contains one of the critical "pinchpoints" referenced by CPW. CPW's objective is to limit human activity.

Game Carts - Several hunters who have hunted in Granite Basin have stated they know of no use of game carts. Therefore wilderness designation would have no effect of game cart use.

Effects on Winter Motorized and Mechanized Recreation

The Gunnison Public Lands initiative [ref TBS] notes that in Granite Basin "there may be some snowmobile use on the gentle slopes around Horse Basin". Horse Basin is an area within Granite Basin. The amount of use was small enough that the GPLI member representing snowmobile interests agreed to an SMA that would close Granite Basin to winter motorized use. Closure of Granite Basin to snowmobiling would have negligible effect on winter motorized recreation.

There is no winter mechanized recreation in Granite Basin.

Effects on Fire Management

Nine residential lots in the Roaring Judy residential area have their northern boundaries bordering Granite Basin. The figure above shows the location of these lots. The bordering land in Granite Basin consists of grassland and deciduous trees, primarily aspen. There are few, if any, coniferous trees in Granite Basin close to the residential lots. It is unknown to this author if any mechanical treatment of the forest would be required to reduce the risk of wildfire to homes in the Roaring Judy area.

Effects on Wildlife Management

Many areas of the Gunnison National Forest in the vicinity of Granite Basin are critical habitat for the Gunnison Sage-Grouse. There may be some small areas of habitat within the Granite Basin Colorado Roadless Area as a whole, but there are no areas of critical habitat within the 9,220 acre Granite Basin portion recommended for wilderness in 2007. There would no impact to sage grouse habitat restoration caused by designation of Granite Basin as wilderness.

It is unknown to this author if there exist proposals for prescribed burns in Granite Basin to improve wildlife

habitat.

Effects on Unique and Outstanding Natural Areas

Granite Basin contains a substantial portion of the B1/B2 Cement Creek Potential Conservation Area. [ref TBS] "The function of this land is a potential groundwater recharge zone, which must be maintained to preserve the hydrological integrity of the extreme rich fens." There is no indication that mechanical treatment of the area would be required.

Effects on Timber

The 2006 Wilderness availability analysis [ref TBS] considered whether "the land is needed to meet clearly documented resource demands such as for timber." The analysis found that the value of wilderness exceeded the value of harvest of suitable timber acres within Granite Basin. [ref TBS]

Effects on Manageability

Unauthorized access - Wilderness designation brings the possibility of unauthorized access, particularly by mountain bikers who previously had access to the Granite Basin/Eccher trail. There is a very small bike usage today so unauthorized access by previous bike trail users is expected to be very small.

Importantly, the Created Butte community respects designated Wilderness. Even disappointed bikers will make an effort to forego use of Granite Basin.

Finally, the entrance to the Granite Basin trail is very difficult to find and access making it unlikely that new visitors would seek out a trail that is no longer on mountain bike trail maps and clearly marked as wilderness.

Visitor volume - Hiker visitation may increase upon Wilderness designation. Wilderness areas are attractions. But even a tenfold increase would still leave the Granite Basin area with excellent solitude characteristics.

Regarding how much of an attraction Granite Basin would be after wilderness designation here is one opinion.

[ref TBS] The RARE I/II evaluation of the Cement Creek roadless area (which contained Granite Basin) concluded that:

"The area [would be unlikely to relieve primitive recreation pressure on existing Wilderness because it] has little water attraction or fishing opportunities and does not offer the spectacular scenery found in most of the existing areas. On the other hand, an area which does not attract heavy recreation is more likely to retain opportunities for solitude and is more likely to remain in a natural condition."

It is to be expected that over-visitation would not be a problem. Granite Basin's small size would not attract multi-day users, especially since the lack of water would discourage backpacking in the area.

Volunteers - Volunteer labor in Granite Basin from mountain biking groups would likely end when bike trails are converted to hiker/horse. That labor could then go to other pressing mountain bike trail needs. There would not be a net loss of volunteer labor.

New volunteers would take over a small amount of trail maintenance each year clearing downed trees. Local residents could volunteer to become Wilderness rangers and monitors. For example, last year Crested Butte-based Silent Tracks provided over 80 hours of volunteer labor for Wilderness monitoring in the West Elk Wilderness area. Other individuals have commented to GMUG that they would be willing to volunteer.

Ditch - The Bear Gulch Ditch is discussed in the document "Evaluation of Granite Basin Wilderness Characteristics Bob Goettge 5-13-19" previously submitted to GMUG.

Effects on Disabled Visitors

It is quite unlikely that there are currently any mobility disabled visitors to Granite Basin because of its topography and rough condition and narrow width of trail surfaces.

Effects on Wildlife

Hikers have observed a variety of wildlife in Granite Basin including mountain lions, black bears, eagles, dusky grouse, and Northern Goshawks. But the most frequently reported were elk and mule deer.

The Granite Basin/Eccher Gulch trail would be closed to mountain biking following designation. In 2010 a northern spur of Granite Basin trail and the Pioneer Ski hiking trail were also closed. Although hikers still use these trails, they no longer appear on trail maps and guide books. The effect would be to reduce human activity, especially from mountain bikers.

Reduced human activity would benefit elk migration through the Almont Triangle Corridor. According to CPW "[The Almont Triangle Corridor] area serves as a documented pinchpoint for ungulates movements to critical winter ranges to the south." More directly, CPW warns that "Future increases in recreational and other off-highway traffic in the Almont area threaten the long-term viability of large populations of elk and deer . . . Due to the significance of this area, CPW recommends no additional routes of any kind be constructed." Wilderness designation would prevent new hike/bike trails as well as closing the existing bike trail as CPW recommends.

The CPW's recommendation may also affect GMUG's near-term consideration of new trail construction in Granite Basin. If and when Granite Basin is recommended for Wilderness designation the Forest Service may decide to not consider new trail construction. Such a decision could actually be included as part of the revised Forest Plan so it would become effective upon Plan approval. Actual designation is not assured and may take many years after Plan approval. But the Plan's direction for management of recommended wilderness would have immediate effect. Timely management action is a positive for CPW's elk recommendations and a very significant distinction between a Forest Service wilderness recommendation and a citizen proposal for a Special Management Area.

E-bikes: If Granite Basin is not designated as Wilderness, the Granite Basin /Eccher trail may be a perfect trail to be opened to electric bikes. GMUG states:

"Electric bikes (e-bikes) are a recent technology. The agency currently considers e-bikes to be motorized vehicles and are restricted to roads and motorized trails. The e-biking community has concerns about this designation. E-bikes are generally quiet, which may change the sound impact and make them appropriate for a non-motorized setting in terms of noise." [ref TBS]

Two of the reasons why Granite Basin/Eccher trail has such low use are difficult uphill climbs and long loops or shuttles. E-bikes would overcome these obstacles if e-bikes were open to non-motorized trails. The human activity concerns of CPW would be magnified if Granite Basin were open to e-bikes.

Wilderness designation would ensure that e-bikes would not be authorized for use in Granite Basin.

In summary, Wilderness designation would have the effect of reducing future growth of human recreation in Granite Basin. CPW's recommendations imply that the area is already at a tipping point of

ecological sustainability with respect to elk herds. Future development of planned mountain bike trails and potential classification of e-bikes as non-motorized would be permanently prevented with wilderness designation.

Effects on Ecosystem Representation

The 2006 Availability and Need Evaluation found that: "this area [Granite Basin] would contribute to wilderness lands within the 9000'-12,000' elevation range within Eco-region M331H. Currently the majority of wilderness lands within M331H on the GMUG are above 12,000' (79%)."[ref TBS]

More recent analyses of the contributions to ecosystem representation were provided to GUMG by The Wilderness Society in Appendix 1: Ecosystem Representation in the GMUG National Forest", January 17, 2017, Vera Smith, The Wilderness Society et. al. [ref TBS]

Effects on Grazing

While there are cattle allotments within Granite Basin, one commenter [ref TBS] observed that there hasn't been cattle grazing in Horse Basin area for 20 years. Horse Basin is a Reserve Forage allotment. [ref TBS]

Cattle grazing in limited sections of Granite Basin would not be a pervasive impediment to natural appearance or solitude.

Effects on Social Sustainability

Many factors play a part in how community values change over time. The explosive growth of tourism, impacts on housing, influx of amenity migrants, and shifting demographics all contribute to changing values in the Crested Butte area. It's difficult enough for local community leaders to keep abreast of changing values. It will continue to be great challenge for GMUG to keep GMUG Forest contributions to social sustainability current with changing community values.

One of the largest contribution of the Forest to social sustainability is conservation and preservation of ecosystems and wildlife. The Crested Butte area community values are transitioning away from expansion of back country recreation and moving more toward conservation and preservation. (The community has always valued preservation of its ranching heritage). In one example of this change, the Town of Crested Butte recently

asked the local mountain biking group to remove a trail from its proposed five-year plan. The Town cited wildlife and grazing among its concerns.

This author suggests the Forest Service continue to reach out at the local level to sense changes and encourage vetting of Forest Service plans with the community. Additionally, the Forest Service should encourage local groups with plans for development in the Forest to vet these plans with the community prior to formal proposals to the agency. In one example the local biking group vetted a particular trail

with the public. A local rancher, hunter, and wildlife advocate spoke up, saying the proposed trail could impact cattle operations and the elk herds that use the area. He suggested the bikers have the hard conversations about the trail with the livestock producers and hunters that will feel the impacts.

Another change in the community is the amenity value the Forests bring to communities, attracting new residents, not just tourists seeking short term, seasonal recreation. As amenity migrants become residents they different vitality and diversity communities. For example Forest Service research has indicated that proximity to a wilderness area is an amenity sought out by home buyers.

Crested Butte is sometimes described as a town with 2 gas stations and 150 nonprofits. A significant number of those nonprofits provide essential well-being services to the community. Their success is dependent on financial support and volunteer labor from both full time and part time residents. When viewed as attractions for new residents, Forest based amenities can contribute indirectly but significantly to the viability of local nonprofits.

Effects on Economic Sustainability

Wilderness designation for Granite Basin would create a new wilderness area in close proximity to Crested Butte South, the second largest community in Gunnison County. Wilderness designation can have both negative and positive economic impact.

One possible negative impact of Wilderness designation is the lower resource value of the Forest such as for timber harvest. GMUG's 2006 analyses looked at such resource value considerations and found these impacts would not be significant for the Granite Basin wilderness.

Wilderness designation would change the mode of travel on the 4.1 mile Granite Basin/Escher trail from mountain bike to hiker/horse. While it's possible that such change would have economic impact,

GMUG's broad assessment of mode of travel changes is quite clear in terms of economic impact.

"It is understood that changes in the mode of travel on some roads or trails may shift the type of available recreational use. Closures of some routes to public travel would reduce the number of miles of roads or trails, but there is no indication that reduced miles of one type of travel would adversely impact the recreational experience or lower the quality of the experience. It can be assumed that if the recreational opportunity continues to exist and there would be no definable change in the quality of experience, then there would be little or no change in the levels of use and no measurable economic

impact."[ref TBS]

This general statement of no economic impact is particularly true since Granite Basin/Eccher is a locals' trail having very low use.

Noted local economist Dr. Paul Holden's recent economic study found that Gunnison County is "highly dependent on tourism and construction, two of the most procyclical and seasonal sectors of the economy. Wages in tourism industry are among the lowest paid by employers in any sector in the

County. The average salary in the tourism sector in Gunnison County was \$19,674 in 2015." The Outdoor Alliance study supports Holden's figure with an average salary of \$23,500 in 2018.

Dr. Holden believes that diversifying the economy of Gunnison County, particularly away from tourism, is an important goal. Several studies show that Wilderness proximity to homes is an amenity that increases property values. This type of amenity is also an attraction for location neutral (remote) workers. Many residents in Crested Butte South have observed the increasing arrival rates of new residents bringing with them location neutral jobs. Such jobs diversify the economy across multiple dimensions such as industry and income.

Other Relevant Information

GMUG 2006 Availability Determination for Granite Basin

The 2006, GMUG's Wilderness evaluation found that a 16,227 acre portion of the 25,450 acre Granite Basin roadless area had high wilderness characteristics and was therefore "capable" of becoming wilderness.

The 16,227 capable acres were analyzed for availability, meaning that the value of existing or potential non-wilderness uses (e.g., mountain biking) was not significant compared to the value of wilderness.

Availability analysis concluded that "the east side of the [capable] unit contains premier mountain bike opportunities and is not available for wilderness; however, west of the Deadman and Cement Mountain Trail is considered to be available." The west portion is the 9,220 acre Granite Basin portion subsequently recommended for Wilderness designation.

Analysis of the west portion included the 5 mile Granite Basin/Eccher trail. The analysis found that the value of mountain biking in Granite Basin was not a significant barrier to wilderness designation. (The trail was 5 miles in length in 2006. Travel management closed 0.9 miles in 2010). .

Management Area Themes

The Granite Basin area should be assigned the "Natural Processes Dominate" Management Area Theme. Almost 60 percent of Granite Basin's area has special designation as either B1/B2 PCA with globally imperiled plant species or upper tier acres.

This theme should continue if and when Granite Basin is recommended for wilderness designation and upon wilderness designation.

Public Comments on Granite Basin Wilderness

The following is a brief compendium of points made by proponents and opponents of Granite Basin wilderness designation in comments sent to GMUG.

Proponents of wilderness

Conservation - Wildlife, Ecosystems Enjoy nature and solitude, health benefits Preservation for future generations

Non-mechanized (hiker) recreation

No bikes - Many other mountain biking trails

35+ commenters are hikers and hunters who have been in Granite Basin Many provided descriptions of the area

Opponents of wilderness

All objected to closing the mountain bike trail

Support GPLI's SMA approach that was inclusive of all users SMA has same protections as wilderness

Already enough wilderness areas Wilderness areas are not multiple use

Loss of great bike trails - best in state, connect drainages 2 (3?) commenters said they had ridden the trail

Gunnison Public Lands Initiative (GPLI)

Many opponents of Granite Basin Wilderness base their opposition in part on GPLI's recommendation of SMA for protection of Granite Basin. Using an SMA approach would preserve the Eccher trail and other planned bike trail development. Almost all cited GPLI's SMA approach and representation of all user interests as a reason for opposition.

As a matter of fact, GPLI did not include all major user interests. When GPLI was convened by the Gunnison BOCC in 2013 its membership included three mountain bike organizations (International Mountain Biking Association, Crested Butte Mountain Biking Association, and Gunnison Trails), High Country Conservation Advocates, and The Wilderness Society. In 2016, GPLI added representation for several other recreation interests, snowmobiling, OHV riding, hunting, and fishing. GPLI never included representatives for cross country skiing or hiking. Although local residents advocated with GPLI leadership for correcting these omissions, representatives were never added. Thus, the impression that many opponents of Wilderness have that GPLI represented all users is not based on fact.

In its first report "Draft Gunnison Lands Protection Areas", June 18, 2013, GPLI had the following recommendation for the area which GMUG had titled Granite Basin in 2007.

"Granite Basin West is also recommended for an SMA designation although it is a Recommended Wilderness by the Forest Service. There is one mechanized trail in the area, and the boundary of the SMA would be a fairly well-used motorized trail. Thus, it is suggested that SMA regulations include mineral withdrawal, no winter or summer motorized (currently there is no existing motorized use), but allow for mechanized use and the ability to reroute the trail when necessary."

GPLI made a decision to not close any roads or trails that were currently open. Existing trail uses would remain essentially the same. Also, plans for future trail projects would be accommodated for agency consideration. The result of this decision was that any area containing a mechanized trail, or any area where there existed a plan for a mechanized trail, would not be recommended for wilderness by GPLI.

GPLI's no closure ground rule can also be seen at work in its 2016 recommendation for Granite Basin:

"Granite Basin West is also recommended for an SMA designation. We suggest that SMA regulations include mineral withdrawal, no winter or summer motorized (currently there is no existing motorized use), but allow for mechanized use on the existing Granite Basin, and the ability to reroute the trail when necessary. The SMA would also allow for a wide enough corridor between Granite Basin East and East Cement Mountain to allow for the realignment of the Cement Mountain Trail. Although the Forest Service recommended Granite Basin West for Wilderness in 2007, we have proposed an SMA to allow for the use of the Granite Basin Trail."

Most recently, the January 9, 2019 version of GPLI's proposal states:

"Granite Basin Protection Area - An SMA with the following stipulations:

No new mechanized vehicle uses, beyond those existing at the time of enactment, with a savings provision that would allow for the potential development of the Eccher exit trail for mountain bikes at Highway 135.

The SMA would allow for continued use of the Eccher Gulch trail as well as potential realignments and improvements."

As a result any comment made to GPLI supporting Wilderness designation for an area with an existing mechanized trail or a planned trail would be non-compliant with GPLI's ground rules. Since Granite Basin has both existing and planned mechanized trails, the 100 plus comments made to GMUG supporting Wilderness designation for Granite Basin would be irrelevant to the GPLI working group's decision-making process. The ground rule made it pointless to present GMUG's 2006 evaluation methodology and results, analyses in the Travel Management DEIS, or the observations, analyses, and recommendations of the community regarding Granite Basin wilderness to GPLI.

Appendices

To be supplied in Revision 1

References

To be supplied in Revision 1