

Data Submitted (UTC 11): 8/1/2019 6:00:00 AM

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Title:

Comments: Outdoor Alliance GMUG Vision & Working Draft Plan feedback

Samantha, Brittany and the GMUG Planning Team,

Please find the attached Outdoor Alliance GMUG Vision (OAGV). The OAGV was developed cooperatively with leaders in the human-powered recreation and conservation communities. It seeks to identify, develop and recommend forest-wide policies and site-specific designations which enjoy broad support from local, statewide and national stakeholders. We submit the OAGV as feedback on the GMUG Working Draft Forest Plan dated June 2019.

The OAGV provides a vision for world-class sustainable recreation in the Grand Mesa, Uncompahgre, and Gunnison National Forests using narrative and geospatial maps. Given the depth of this document we also submit a companion executive summary document that provides a high-level roadmap to the OAGV. The OAGV interactive maps may be found online at: <https://arcg.is/1OniLi0>

We recognize that the scope of the OAGV goes beyond simply offering feedback on the GMUG Working Draft Plan. To help the Planning Team integrate our feedback into the planning process, we will be submitting additional feedback letters and data analysis comparing our vision to the Working Draft Plan. We are also available to meet via phone or in person to assist the Planning Team with answers to any questions you may have about the OAGV.

The collaborative process of crafting the OAGV has sparked important conversations between stakeholders, some of which are and will continue to be ongoing. We submit the OAGV today, but consider it a living document. As the continuing conversations produce changes in the OAGV, we will notify and update the GMUG Planning Team.

Thank you for your consideration and please don't hesitate to reach out with any questions.

Thanks,

Jason Bertolacci

#### A Human-Powered Vision for the GMUG

Led by local stakeholders, OA convened a dialogue to seek consensus among partners and create a common vision for the GMUG National Forests to help guide the Forest Service's development of the draft forest plan. The Outdoor Alliance GMUG Vision (OAGV) is a product of that effort.

The OAGV captures [ndash] in narrative, recommended designations, and GIS data and maps [ndash] what human-powered recreational users see as a successful outcome of a new forest plan, including how the forests are used now and will be used in the future for recreation, the places that are crucial for these activities, and the impact that human-powered recreation has on the local and regional communities surrounding the forests.

The vision has been developed complementary to, but independent of, the formal comment opportunities of the GMUG planning process. The recreational significance of the forests for outdoor recreation is difficult to overstate, and we greatly appreciate the planning team's attention to these important issues.

#### GMUG Geographic Area [ndash] A Brief Sense of Place

The Grand Mesa, Uncompahgre, and Gunnison National Forests encompass a diversity of landscapes that support innumerable opportunities for human-powered recreation [ndash] from Nordic Skiing on the Grand Mesa to ice climbing in Ouray's Ice Park to whitewater kayaking on Crested Butte's challenging steep creeks. The GMUG National Forests are the heart of Colorado's Western Slope.

[bull] The Grand Mesa rises up 6,000 feet from the city of Grand Junction, which lies to the west of the Forest. One of the world's largest flat top mountains, the Grand Mesa is host to more than 300 lakes [ndash] an oasis next to the desert landscape to the west. The Mesa provides endless hiking, mountain biking, and rock climbing opportunities in the summer and world-class Nordic skiing in the winter. The area, although vast, is easily accessed from Grand Junction and the I-70 corridor.

[bull] The Uncompahgre National Forest surrounds the small mountain towns of Telluride and Ouray, known for their world-class backcountry skiing and ice-climbing, respectively. The headwaters of the Uncompahgre and San Miguel Rivers both originate in the forest, and it is home to Colorado's tallest free-flowing falls, Bridal Veil Falls. With three alpine wilderness areas, Mt. Sneffels, Lizard Head, and the Uncompahgre, the forest attracts visitors during all seasons.

[bull] The Gunnison National Forest is the source of the mighty Gunnison River, which originates at the confluence of the East and the Taylor Rivers. Colorado's impressive Elk Mountains border the Forest to the north, the Sawatch Range frames the eastern border, and the San Juans are located to the south. The small towns of Gunnison and Crested Butte are the populous centers in the area and Gunnison is home to Western Colorado University (WCU). WCU boasts a strong outdoor recreation program and has been a very active research hub for the valley.

The diversity of scenic landscapes on the GMUG provide for a variety of outdoor experiences. The region varies from the high alpine peaks of the Northern San Juans, to lush vegetation in the Gothic Valley, to sagebrush steppe on the Uncompahgre Plateau, to craggy canyons and rock outcroppings in the Gunnison Valley. These unique ecosystems and viewsheds make the GMUG a world-renowned destination for outdoor exploration. Some key facts that influenced our thinking in the development of this document include:

[bull] Human-powered recreation is rapidly growing throughout the GMUG, attracting visitors and residents alike. Human-powered recreation visitors contribute \$392 million in annual visitor spending and 92% of Colorado's Western Slope residents report they choose to live here because of the access to the outdoors.<sup>1</sup>

1 Outdoor Alliance. (2018). The Economic Influence of Human Powered Recreation in Colorado's Grand Mesa, Uncompahgre, and Gunnison National Forests. Retrieved from [https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bff483303ce647407356fc1/1543456828876/O\\_A\\_GMUGNF\\_SharePiece.pdf](https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bff483303ce647407356fc1/1543456828876/O_A_GMUGNF_SharePiece.pdf)

[bull] Each forest in the GMUG provides important commercial recreation opportunities, including rental and retail shops, river guides, backcountry ski guides, and outdoor education opportunities. Additionally, the recreation tourism economy relies on and supports local hospitality businesses including restaurants, lodging, and entertainment.

[bull] The GMUG offers a diversity of human-powered recreation opportunities, including mountain biking, ice and rock climbing, hiking, paddling, Nordic skiing, backcountry skiing, trail running, mountaineering, and snowshoeing.

[bull] The region is known and appreciated for its small mountain towns, rural communities, ranchlands, and remote landscapes.

[bull] Colorado's population is quickly growing and Colorado's Western Slope is expected to grow 67.2% by 2050.<sup>2</sup> With an increase in residents and visitors to the GMUG, there will be more pressure on the forests' resources and landscapes, requiring greater attention from land managers to protect the incredible experiences that the GMUG has to offer.

[bull] The GMUG is home to a diverse wildlife population including elk, sage grouse, raptors, trout, and lynx. Wildlife viewing, hunting, and fishing are all popular recreation activities on the GMUG.

The GMUG Human-Powered Recreation Vision is a coalition of partners coming together to create a shared vision for public land throughout the Grand Mesa, Uncompahgre, and Gunnison National Forests. We represent diverse voices and aim to create broadly supported recommendations for the Forest Service's revision of the GMUG Forest Plan (herein forest plan).

We want to see a forest plan that provides thoughtful management for the future of our public lands by accommodating sustainable recreation opportunities while preserving the health and integrity of the surrounding natural resources. We identified the following shared values that inform our recommendations:

[bull] Recreation: We agree there is enormous recreation value to residents and visitors alike. There is a wide spectrum of recreation activities that occur on our public lands and the demand for outdoor opportunities on the forests is expanding. We believe recreation management is needed to ensure the quality of diverse recreation opportunities and to sustain the integrity of the natural landscape in the face of increasing visitation.

[bull] Ecological: We agree on the value of fish and wildlife habitats, clean water, clean air, and diverse forests. We recognize that a positive recreation experience is dependent upon the quality of the surrounding natural resources, which provide for scenic viewsheds,

2 The Denver Post. November 7, 2017. What Colorado regions will grow fastest through 2050? The answer is not metro Denver. Retrieved from <https://www.denverpost.com/2017/11/07/colorado-population-growth-fastest-regions/>

environmental health, wildlife encounters, the feeling of solitude, and a natural experience. Protecting the health of these ecological values is a commonality of our work together.

[bull] Economic: We agree that our local economies are fundamentally connected to the public land in the GMUG National Forests. The unique natural values and recreational access to public lands make the GMUG area an attractive place to live, work, recreate, and visit, bringing diverse financial contributions that strengthen the local and state economy through recreational access, special use permitting, contracting, and the ecosystem services that the Forests provide.

[bull] Social: We agree on the value of working together. We seek solutions that honor both human uses and the protection of natural values on our public lands for future generations. While our group consists primarily of human-powered recreationists, we recognize the importance of not only working with our community, but also the importance of working with other partners and communities to find collaborative management solutions.

[bull] Wild Character: We recognize the value in sustaining a wild and natural character on the GMUG National Forests. Maintaining diverse opportunities for solitude, primitive, and quiet types of recreation are key to the uniqueness of this ecosystem.

## GMUG Economic Impact Study

If you're one of the 2.6 million people who visit the Grand Mesa, Uncompahgre, and Gunnison National Forests each year, you know that this area of western Colorado is incomparable. A series of economic studies, commissioned by Outdoor Alliance, measures the economic impact of outdoor recreation in the region. Researchers found that outdoor recreation in the Grand Mesa, Uncompahgre, and Gunnison National Forests generates \$392 million in annual spending on paddling, climbing, hiking, snowsports, and mountain biking while also supporting local jobs and attracting both businesses and residents to Colorado. It is imperative that the economic impact of these activities is prioritized in the GMUG forest planning process for the economic health of rural Colorado.

The Economic Influence of Human Powered Recreation in Colorado's Grand Mesa, Uncompahgre, & Gunnison National Forests

<https://www.outdooralliance.org/gmug-economic-reports>

## Policy Recommendations

The following section details forest-wide policy and management recommendations to assist the GMUG National Forests in successfully and sustainably managing recreation on the forests' lands and waters.

## General Recommendations

### Plan for Sustainable and Balanced Recreation Opportunities

Population growth, technological advances, climate change, and many other variables will affect the GMUG in future years. We recommend that the Forest Service prioritize the long-term ecological health of the public lands, wildlife, and watersheds, as well as the increased need for opportunities to sustainably enjoy the forests. We support forest plan components and decision-making processes that focus on long-term solutions, preserve access to public lands, and protect natural environments and wildlife habitat in order to leave a legacy for future generations. This should also take into consideration the ongoing and accelerating effects of climate change.

As the population grows and the number and types of users in the backcountry continue to rise, opportunities for solitude will become more difficult to find, and places to [ldquo]escape[rdquo] will become even more valuable. The opportunity to interact with nature in quiet places enhances healing, reduces stress, and provides an improved sense of well-being. An emerging field, ecotherapy, recognizes the importance of this connection with nature.

With the population of Colorado forecasted to grow from 5.5 million to 8.5 million people by 2050, we recognize that it will be complex to simultaneously prioritize recreation, wildlife habitat, and overall forest health. Please consider the organizations that have contributed to this GMUG Vision document [ndash] and all the organizations that fall under the human-powered recreation umbrella of Outdoor Alliance [ndash] as partners in this endeavor. Each organization advocates for the individual needs of its community, but all are bound by our mutual connection to the lands and waters of the GMUG. Our organizations, if engaged in an intentional manner, can help shape a generation of passionate and responsible stewards of our natural resources.

#### Collaborate with other Federal and Private Landowners to Preserve Recreation Access

Throughout the GMUG National Forests, there are complex property boundaries between the Forest Service, Bureau of Land Management (BLM), and private property owners. These property boundaries often exist in or near river corridors and trail systems, complicating access to rivers and trails in some areas. Where these boundaries intersect with both water-based and land-based recreation opportunities, the Forest Service should work closely with the BLM and with private property owners to preserve and improve access to sustainable recreation, while respecting private property rights and existing grazing rights.

#### Recreation Opportunity Spectrum

The Forest Service is required to use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes.<sup>3</sup> Certain recreation resources may be valued by users because of unique physical or geographic attributes regardless of the ROS setting. Although there are challenges with the ROS, it is an important tool for forest-scale planning.

The DEIS should describe the different ROS classes as well as the characteristics of different ROS settings and associated plan components to achieve the desired ROS settings. The Planning Rule requires that a plan [ldquo]must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses,[rdquo] including outdoor recreation.<sup>4</sup> Likewise, the 2012 Planning Rule states that plans [ldquo]must include plan components, including standards or guidelines, to provide for sustainable recreation,[rdquo] including [ldquo]specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes.[rdquo]<sup>5</sup> We recommend the GMUG National Forests follow the example set by the Flathead National Forest, whose newly revised plan includes plan components that describe the settings, appropriate uses, and other details associated with the ROS.<sup>6</sup>

In developing the ROS, the GMUG National Forests should consider input from the public detailing place-specific recreation uses. Understanding how the public recreates on the forests is not only essential in developing the ROS, it will help the GMUG use the ROS to integrate recreation more fully into other aspects of forest management.

It is important that the revised forest plan include winter-specific ROS. When snow covers the landscape, recreation opportunities, settings, and access change dramatically across the forest. Some areas become less accessible and take on a more remote feel than in the summer. This change results in some areas that are classified as roaded natural or semi-primitive motorized in the summer may change to semi-primitive non-motorized in the winter. Other areas which are non-motorized in summer may be suitable for over-snow vehicles. Although the full range of ROS settings are still evident on the forests in winter, the location, distribution, and total acreage of each setting may change significantly.

Given the distinct differences in use, access, and setting on the GMUG during winter versus summer, the revised plan must include separate recreation opportunity spectrum classifications for summer and winter. Winter ROS settings also set the stage for winter travel planning, required under the 2015 Over-Snow Vehicle Rule, by helping the Forest Service better define where over-snow vehicle use is and is not suitable. This is an important first step towards winter travel planning.

The final EIS and final plans should make clear that ROS settings do not preclude travel planning decisions. The final plans should explain that site-specific travel planning is needed to determine

3 FSH 1909.12

4 36 C.F.R. [sect] 219.10(a)

5 FSH 1909.12, ch. 20, [sect] 23.23a(2)(g)

6 Flathead National Forest draft plan, pages 56-59

([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd567581.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd567581.pdf))

where motorized vehicle use will be allowed (including over-snow) within semi-primitive, roaded natural, and rural areas. Chapter 10[sect]11.2 of the recently revised Travel Management Planning directives state, [ldquo]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.[rdquo] Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. [sect] 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 travel management designations.

## Trail Recommendations

### Cohesive and Inclusive Trail Systems

The OAGV has identified the need for more cohesive trail systems across the GMUG. Compared to individual trails, cohesive and inclusive trail systems can accommodate more users, proactively counterbalance potential overuse of individual trails, and offer the necessary infrastructure for future growth. Well-rounded trail systems are necessary to improve recreation opportunities and experiences within the GMUG, allow for future growth of human-powered recreation, and protect the surrounding environmental areas. While we recognize that site-specific decision making is not a part of the planning process, we believe the forest plan should lay the groundwork for future trail system improvements. Cohesive and inclusive trail systems should include the following attributes:

- [bull] Linked and stacked trails that create a diverse trail system. This opens up more options for varying skill levels and recreation types in one zone or region (see additional recommendations below).

- [bull] Connectivity to the trail system. Connecting existing trails and providing trails that link to increasingly busier roads and multi-use/motorized use will provide better user safety and trail experiences.

- [bull] Proper signage (signage at trailheads and intersections) and consistency among signage (signage that users can identify and recognize throughout the trail system).

- [bull] Trailheads that offer appropriate infrastructure for their specific location, use, and trail types. The agency should monitor high/moderate-use recreation areas to determine needs for parking, bathrooms, signage, etc.

- [bull] Parking options that are fitting for the trail use level and type. Appropriate parking area size should consider future recreation growth in that particular area.

- [bull] Adaptive management strategies to address user conflict:

- o When conflicts occur between users of a trail or system, managers should use the least restrictive management tool necessary to manage conflict. Often education, familiarity, and discussion between user groups is sufficient.



o When less restrictive methods for resolving conflict are insufficient, land managers should consider separating users by rotating timed use restrictions (e.g. a trail is open to mountain bikes only Saturdays and hikers only Sundays, while shared use is allowed Monday-Friday) or by implementing separate use trails to preserve and adapt to the desired experience of different users. When separate use trails are employed, trails should be added to accommodate for separate uses. These more restrictive methods should be used as a last resort and only in areas which receive excessive visitation or highly managed trails near population centers.

[bull] Trail etiquette and education resources, including right of way information and trail maps where appropriate.

[bull] Effective trail maintenance plans and partnerships with local organizations to ensure funding and resources are available for ongoing trail maintenance.

#### Stacked Trails and Loops

Throughout areas of the GMUG, national forest land is scattered with private property parcels, various terrain types and difficulty levels, and environmentally sensitive landscapes. For this reason, we recommend that stacked and looped trails be allowed in areas that can accommodate them. We recommend that the agency identify potential areas for stacked-loop trail systems which may include some of all of the following characteristics:

[bull] Zones that currently experience a high level of use;

[bull] Zones that may alleviate pressure on other areas where high use should be avoided;

[bull] Areas near existing recreational development;

[bull] Trails/trailheads in close proximity to established towns; and/or

[bull] Trails/trailheads in close proximity to campgrounds.

Consent to allow for more than one trail in a specific area will broaden use for multiple recreation levels, help to

establish [ldquo]recreation hubs,[rdquo] and accommodate more recreationists, especially as community populations and the popularity of recreation rises.

#### System-to-System Connectivity Trails

Many trail systems exist as [ldquo]islands[rdquo] lacking connectivity to other nearby systems. Linking these systems with point-to-point connectivity trails can drastically increase the mileage available to users from a single ingress point, alleviating crowding and access challenges. Often these linkages will require the use of lands not managed by the Forest Service. The OAGV encourages the Forest Service to work proactively with recreational users, private land owners, and other

land management agencies to accommodate trail connectivity. Additionally, when planning a trail system, the Forest Service should look for logical ingress/egress points that may serve as natural locations for connecting users to future trails.

#### Trailhead Experience

The quality of a user[rsquo]s outdoor experience, especially on shared terrain and on popular trails within a few-mile radius of multi-use trailheads, can be adversely affected by other users in high-density settings. For safety reasons and to reduce conflicts between user groups, the Forest Service should consider providing separate trails or varied closure periods for different user groups in high-use recreation areas. The trailhead proximity issue could be exacerbated in the winter, when access to wilderness areas and many other summer trailheads is not feasible.

#### Infrastructure Recommendations

##### Signage

Signage and infrastructure (e.g. barrier fencing, outhouses, etc.) are important components to support sustainable recreation where needed. Some areas may benefit from additional signage, especially where it emphasizes safety and education, such as:

[bull] River signage and guidance on difficulty levels, and maps showing access points (e.g. Bilk Creek section of the San Miguel). For example, The Arkansas Headwaters Recreation Area provides a good model for river signage;

[bull] More information for hikers about safety during hunting season;

[bull] Trail etiquette and other education resources; and

[bull] Opportunities to volunteer and participate in stewardship activities.

The forests should also be strategic in the use of signage, recognizing that signing decisions will affect some users' choice of areas to visit. If the Forest Service builds infrastructure or advertises a particular recreation access point, use will increase. In some cases, signage has increased substantially and has led to an increase in recreation demand. For example, the Dry Creek area on the Uncompahgre Plateau outside of Montrose has seen a large increase in user visitations after the placement of additional signage. To help offset signage's potential to attract users, signage at one location may be used to redirect users to another area with better infrastructure to accommodate additional use.

#### Dispersed Camping

Increased dispersed camping can have negative impacts on both natural resources and user experiences on the GMUG National Forests. For example, the proliferation of dispersed camping sites in areas like Slate Creek near Crested Butte is contributing to large areas of denuded soils and vegetation loss, erosion and sedimentation of local waterways, and an abundance of human waste and environmental health concerns. We recommend that the Forest Service complete a

comprehensive inventory of dispersed camping areas and determine areas for additional management including: designated dispersed camping with easily accessible restroom facilities, overnight visitor use permits, developed/fee-based campgrounds, installations of barriers or vehicle controls to restrict access, and/or prohibition of dispersed camping in certain areas to protect resources. Signage and enforcement are key to ensuring user education and compliance with new camping regulations and we recommend the Forest Service to work with user groups, as well as tourism media outlets (visitors centers, chambers of commerce, social media), to communicate with visitors. Management should also include preparation for future growth of dispersed camping in new areas (e.g. when a popular area is closed or permitted, use may just shift to a new unmanaged area). Ongoing monitoring of dispersed camping areas is essential to assess use, impact, and changes over time, and we recommend partnership with local volunteer organizations to help capture this data. Some areas on the forests will need expanded dispersed and designated camping opportunities, such as on and around Owl Creek Pass.

#### Winter Recommendations

##### Winter Recreation Planning

While we recognize that the forest will not be undertaking Winter Travel Planning during the forest plan revision process, we do expect a comprehensive review of current and future winter recreation uses, suitability of over-snow vehicle use, and application of a Winter Recreation Opportunity Spectrum (ROS). Winter ROS settings will

help build a framework for winter travel planning required under the 2015 Over-Snow Vehicle Rule (36 C.F.R. part 212). The winter ROS should be designed so that non-motorized experiences can be easily enjoyed in both the front- country and backcountry. Non-motorized winter ROS settings should be assigned to sensitive wildlife areas, such as lynx habitat, or ungulate winter range to high-value non-motorized recreation areas. Similar to the summer allocations, the GMUG should constrain recreational use and activities as necessary, and when scientifically supported, to protect species habitat and viability (e.g. seasonal restrictions to accommodate hibernation or reduce disturbance during this critical time of year). Additionally, like summer ROS settings, winter ROS in the revised forest plan should reflect desired future conditions rather than simply a reflection of current management.

The revised forest plan should also include a guideline stating that OSV route and area designations will be consistent with winter ROS classifications, but that the extent of permitted OSV use will be determined through implementation-level travel planning to delineate discrete, open areas and routes within areas with motorized settings.

The GMUG is required to determine suitability for motorized recreation (summer and winter) consistent with the desired ROS class.<sup>7</sup> Specific to winter settings, steep slopes and windswept ridgelines, low elevation areas without adequate snowpack, areas with dense tree cover, and important habitat for wintering fish and wildlife should all be found unsuitable for OSV use.<sup>8</sup> The revised forest plan should include an objective to initiate site-specific winter travel planning within one year of completing the forest plan revision in order to bring OSV management in line with suitability determinations made during the forest plan revision (including but not limited to closing unsuitable areas and achieving the winter ROS). The final plan should include clarifying

<sup>7</sup> FSH 1909.12, chapter 20, section 23.23a(2)(d)

<sup>8</sup> 36 CFR part 212: OSV planning is required on NFS lands where snowfall is adequate for OSV use to occur

language that OSVs will not necessarily be permitted in all suitable areas.<sup>9</sup> Rather, suitable areas are a starting point for conducting implementation-level travel planning to designate particular areas and trails in accordance with the ORV Executive Order minimization criteria.<sup>10</sup>

The Forest Service's Best Management Practices (BMP) for water quality management call for forests to institute minimum snow depths, stating that forests should: "Specify the minimum snow depth for each type or class of over-snow vehicle to protect underlying resources as part of any restrictions or prohibitions on over-snow use."<sup>11</sup> The planning rule requires that plans include components to implement these BMPs.<sup>12</sup> More generally, the scientific literature agrees that a minimum snow depth is important for protecting soil, vegetation, and subnivean wildlife.<sup>13</sup> The best available science shows that minimum snow depths should be at least 18 inches for cross- country travel and 12 inches for travel on groomed trails or roads.<sup>14</sup> Instituting this direction as a programmatic plan component at the forest planning level is appropriate because it guides OSV management across the forest and is not a site-specific decision.

## Winter Bicycling

Bicycle technology has evolved to include wide wheels and tires that are run at very low pressure to allow travel over soft surfaces such as sand and snow. [ldquo]Fat bikes,[rdquo] as they are colloquially referred to, are being used for over snow travel for both recreational and transportation purposes for those who prefer to travel under their own power. Fat bike popularity and availability is expanding rapidly, and we recommend that the Forest Service provide acknowledgement and guidance for this use in the new forest plan.

In some areas, prohibitions on fat bike use are derived from seasonal closure orders that prohibit [ldquo]wheeled vehicles[rdquo] on snow trails or specific routes. This prohibition is technically correct as a bicycle is a wheeled vehicle. However, the underlying logic supporting the closure is generally that wheeled vehicles create ruts in groomed trails or muddy areas because of the weight of the vehicle and rider exceeding the weight dispersal capacity of the tire. On a fat bike, the wide tires and low pressure disperse the rider[rsquo]s weight across a larger surface, and minimal rutting occurs.

Successful management of these bicycles has ranged from sharing existing trails with motorized over snow vehicles and non-motorized over-snow travel, to development and grooming of separate over-snow trails for bicycle use. To facilitate the direct management of bicycle use, we request that the following be incorporated into this forest plan:

[bull] Bicycle Definition: A device propelled solely by human power upon which a person or persons may ride on land, having one, two, or more wheels, except a manual wheelchair.

9 See FSH 1909.12, ch. 20, [sect] 22.15(1) (a suitability determination [ldquo]is not a commitment to allow such use but only an indication that the use might be appropriate[rdquo]).

10 Executive Orders 11644 and 11989

11 USFS 2012. National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide. Rec. 7 [ndash]Over-Snow Vehicle Use. Available at [http://www.fs.fed.us/biology/resources/pubs/watershed/FS\\_National\\_Core\\_BMPs\\_April2012.pdf](http://www.fs.fed.us/biology/resources/pubs/watershed/FS_National_Core_BMPs_April2012.pdf)

12 36 C.F.R. [sect] 219.8(a)(4).

13 Tahoe National Forest Over-Snow Vehicle Use Designation Draft Environmental Impact Statement, available at <https://www.fs.usda.gov/project/?project=45914>

14 Switalski 2016 Journal of Conservation Planning Vol 12 (2016) 8 [ndash] 12, at 10-11. Available at

[bull] Clarify restrictions on [ldquo]wheeled vehicle access[rdquo] to include specificity to motorized vehicles, thereby allowing bicycle use (e.g. a seasonal closure may prescribe [ldquo]no motorized wheeled vehicles[rdquo] but would still allow for fat bikes and snowmobiles).

By incorporating this terminology in the forest plan, the Forest Service will have the basic means for managing bicycle use on terra and snow trails in the framework for travel management.

### Rock Climbing Recommendations

Rock climbing is an appropriate and sustainable form of recreation on our country[rsquo]s public lands, and approximately 30% of America[rsquo]s climbing resources (about 10,000 climbing sites) are managed by the Forest Service. Rock climbing presents Forest Service land managers with a unique set of management considerations as a result of activity-specific use patterns and equipment. The climbing user group continues to rapidly grow, and throughout the U.S., land managers collaborate with local climbing communities and national organizations (such as the Access Fund) to steward climbing areas in order to maintain sustainable climbing resources for future generations. The GMUG affords many exceptional and diverse climbing opportunities.

We recommend that the forest plan include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity and supports the conditional use of fixed climbing anchors as appropriate. Fixed anchors, defined by the Access Fund and the Forest Service as climbing equipment (e.g. bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain, are a critical component of a climber[rsquo]s safety system.<sup>15</sup> Fixed anchors are typically placed by the first ascensionist on technical ascents where removable anchor placements are not possible or for descents (rappels) that would be otherwise impossible without a fixed anchor. The vast majority of climbers have never placed a fixed anchor, opting instead to climb established routes and thereby avoiding the burden of the careful deliberation and labor associated with placing a fixed anchor.<sup>16</sup> Fixed anchors, specifically bolts, necessitate long-term maintenance.<sup>17</sup> Current findings indicate that most modern, stainless steel bolts need to be replaced after approximately 50 years, but that antiquated bolts are untrustworthy and need replacement much more frequently.<sup>18</sup>

Well-managed climbing areas provide forest visitors with exceptional recreation experiences. In order to achieve this goal, national forests should 1) foster partnerships with the local climbing community; 2) develop strategies for human waste management, resource protection and erosion control; and 3) collaborate with local climbing organizations on education and stewardship initiatives.

15 See: Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiate

16 Studies indicate that the vast minority of climbers (<20% based on site specific samples) have ever placed a bolt. It is reasonable to assume that an even smaller minority of climbers have placed a bolt (hand drilled) in a remote wilderness setting based on documented climber use-patterns.

Schuster, R. M., Thomson, J. G., & Hammitt, W. E. (2001). Rock Climber's Attitudes Toward Management of Climbing and the Use of Bolts. *Environmental Management*, 28(3), 403-412.

Murdock, E.D. (2010). Perspectives on Rock Climbing Fixed Anchors Through the Lens of the Wilderness Act: Social, Legal and Environmental Implications at Joshua Tree National Park, California (Unpublished).

17 See <https://www.accessfund.org/educate-yourself/for-advocates/managing-fixed-anchors/bolt-basics-what-every-climber-should-know>

18 Ibid.

## Water and Paddling Recommendations

### Recognize Paddling as a Form of Sustainable Recreation

Canoeing, kayaking, and rafting are likely the oldest forms of travel and exploration aside from walking. Even though technological advances have improved safety (as in all outdoor recreation), the core elements of the activity remain [ndash] exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a [ldquo]natural trail[rddquo] through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low- impact, quiet, non-consumptive, skill-based, and wilderness-compliant; it is exactly the kind of activity and experience covered under the definition of [ldquo]sustainable recreation[rddquo] in the new Forest Planning Rule.<sup>19</sup> As such, paddling opportunities in the GMUG National Forests should be given proper recognition, and management measures should protect these opportunities now and for future generations.

### Protect and Improve Water Quality for the Recreation Experience and the Dependent Economy

Local recreation groups have done a great job maintaining trails to reduce erosion and sediment transport. We hope those collaborative efforts, such as Rigs out of Ridgway on the Uncompahgre, not only continue, but expand. However, one of the biggest obstacles to private-sector partners assisting on abandoned mine lands (AML) cleanup is the federal permitting and review processes. An expedited environmental review process is needed for volunteer and nonprofit groups whose projects are environmental rehabilitation focused. Currently, these efforts are treated similarly to project proposals aimed at development or with commercial gain. An expedited review process for joint rehabilitation projects would help grow partnerships with nongovernmental organizations to address water quality through AML remediation. As a result, local fishing guides, who often take clients to fish on permitted river segments in the GMUG National Forests, would benefit from improved water quality.

## Wildlife & Livestock

### Seasonal Closures That Affect Recreation

Throughout the GMUG, various seasonal closures affect trails and broader recreation zones. The OAGV recognizes the need for closures to protect wildlife habitat. However, the Forest Service should work with state and federal agencies to reassess seasonal closures on the GMUG on an individual and recurring basis to ensure they are necessary, supported by current science, and tailored as closely as possible to the needs requiring closure. When a closure is necessary, the Forest Service should provide clarity and transparency on what wildlife indicators determine seasonal closures for individual areas and the science behind the chosen closure dates.

Seasonal closures negatively impact the continuity of recreation and the recreation economy of local communities. Individual closures must be reassessed on a regular basis to ensure they continue to be relevant. This reassessment should include roads and trails currently closed to fat biking in the winter months, in addition to wildlife and other seasonal closures.

19 FSH 1909.12, zero code, section 05

### Grazing and Recreation

Potential conflicts between grazing and recreation should be identified and mitigated through planning and/or education of users. There are some areas on the GMUG that were historically popular for hiking, particularly in wilderness areas, that are now heavily impacted by sheep.

Impacts to recreationists include livestock fences and unsafe interactions with herding dogs. We also recognize that recreationists may have adverse impacts on grazing, including frightening livestock or leaving gates open. The agency must help manage these conflicts where possible. The Forest Service should assess the overlap between grazing allotments and recreational infrastructure (e.g. trails, campgrounds, dispersed camping areas) to identify potential conflicts and mitigation strategies. Signage and education can help users better expect when to encounter livestock and behave more appropriately, while strategic placement and timing of grazing can help minimize overlap in popular recreation areas.

### Education and Resources

#### Partners

The Forest Service should use existing outreach programs and support the development and forest-wide implementation of additional educational resources and programs that foster greater appreciation for public lands. For example, the Forest Service should expand volunteer engagement by programs, maximize efforts provided by outdoor stewardship organizations and youth corps, and work with partners to develop educational resources.



While recreational use of the GMUG has expanded dramatically in recent years, the total recreation budget has been reduced by up to 20 percent since FY 2011, and the proposed budget for FY 2020 includes even deeper cuts. As a result of these budget deficits, deferred maintenance is inevitable, National Quality Standards can't be met, environmental integrity is threatened, and enforcement may be inadequate. Ultimately, these shortfalls can lead to facility and area closures and other undesirable outcomes. To help alleviate resource scarcity, the forest plan must lay the groundwork for the Forest Service to increase its capacity to accept volunteered resources, and enables funding through grants and donations from private and state partnerships.

With GMUG National Forest visitation rising and federal agency funding decreasing, it is urgent that the Forest Service engage outdoor users as responsible stewards of our state's special places, including the GMUG. Outdoor volunteerism and volunteer stewardship organizations can provide an important source of support in maintaining recreational land use, rehabilitating areas damaged by floods and fire, educating the public about natural resources, and cultivating leaders who care for public lands, but barriers exist.

Many of the organizations contributing to this GMUG Vision are part of a Statewide Stewardship Initiative (SSI) effort aimed at building the vital long-term stewardship infrastructure Colorado needs to sustain its outdoor recreation and natural resources. The goals of the initiative are to establish and disseminate best practices and tools that foster strong and sustainable programs capable of responding to Colorado's growing stewardship needs. The Forest Service should

consider these organizations as partners in the endeavor to steward the GMUG and may connect with these organizations directly or through the SSI's website.<sup>20</sup>

#### Research and Scientific Data

We support the use of best available science information throughout the forest plan decision-making process, including outdoor recreation research data and analysis.<sup>21</sup> In cases where there is conflicting science or disagreement on best management options, we support using the highest standards of accuracy, reliability, and relevancy. Examples of potential data sources include climate change concerns presented by the Intergovernmental Panel on Climate Change, local studies conducted by the Western Colorado University Master in Environmental Management Data Collection Initiative, and nationwide and local studies on human-powered recreation by outdoor recreation organizations such as Outdoor Alliance and Winter Wildlands Alliance.

#### Designated Areas and Place-Based Management Recommendations

The Outdoor Alliance GMUG Vision (OAGV) proposes a combination of conservation and recreation designations in the GMUG National Forest to support wildlife habitat, clean water, undeveloped lands, and

diverse recreation access. The map of the OAGV depicts the exact locations and type of designation for each.

Outdoor Alliance GMUG Vision Interactive Map <https://arcg.is/1OniLi0>

We have broken up the OAGV's specific place-based recommendations by forest later in this section, but to start, we would like to highlight and discuss three designated area types.

#### Designation Types Recommended Wilderness Areas

Recommended wilderness area (RWA) is a designation that protects sensitive and unique ecological features and supports many human-powered recreation opportunities. The opportunities for primitive and unconfined recreation in these areas on the GMUG include world-class hiking, mountaineering, and Nordic/backcountry skiing on landscapes with Wilderness

20 <http://outdoorstewardship.org/>

21 <https://www.outdooralliance.org/maps-and-apps>

character. Users can find adventure along with remoteness, solitude, and challenge on trails and dispersed settings.

It is important to note, however, that RWAs are not the proper tool to protect all landscapes and can be a contentious topic during the forest plan revision process. The Forest Service should carefully consider which areas it recommends for Wilderness in the forest plan revision, and then manage these areas to protect wilderness character and the potential for wilderness designation. Some wild backcountry areas contain high-value mountain biking trails or recreation infrastructure, such as bolted climbing areas, that may conflict with a wilderness recommendation. Rather than recommend these areas for wilderness, these areas should be considered for non-motorized backcountry areas (ROS setting, semi-primitive non-motorized).

The Forest Service should work with recreationists to identify possible conflicts between non-conforming recreation uses and RWA designations early in the forest plan revision process so as to avoid creating or escalating conflicts. RWA boundaries should be drawn in a manner that minimizes effects to established recreation infrastructure or uses. RWAs should have a primitive ROS setting.

Desired Conditions:

[bull] Lands are managed to protect their undeveloped character, contribution to biodiversity and landscape connectivity, and quality outdoor recreation and learning opportunities.

[bull] Recommended wilderness areas appear and feel natural to visitors. They are places where natural processes dominate and they contribute to landscape scale protected networks.

[bull] These areas provide visitors opportunities to explore vast areas away from the [ldquo]built[rdquo] civilization and experience wildness and solitude.

#### Standards:

[bull] Motorized public use is prohibited.

[bull] Mineral leasing and sales shall not be permitted.

[bull] Timber shall not be cut, sold, or removed.

#### Guidelines:

[bull] Management activities utilize minimal tool approach.

[bull] Trailhead facilities and trail infrastructure are rustic and unobtrusive.

[bull] Unauthorized routes should be closed and restored to their natural state within five years.

#### Suitability of Lands:

[bull] Not suitable for commercial timber activities.

[bull] Not suitable for motorized travel.

[bull] Not suitable for mineral leasing and sales.

## Backcountry Areas

Some National Forests (e.g. Custer Gallatin) are using a new management unit, called [ldquo]Backcountry Area,[rdquo] to establish management for roadless lands that have high conservation value and include established recreation uses that make wilderness recommendation inappropriate. Backcountry areas should have a primitive or semi-primitive non-motorized ROS setting for both summer and winter use except where motorized use has previously been designated. In such cases, a semi-primitive motorized ROS is appropriate. We suggest management guidelines for backcountry areas below. These components are based off of management for Inventoried Roadless Areas proposed by national forests in New Mexico that are currently revising their forest plans under the 2012 planning rule.

### Desired Conditions:

[bull] These areas provide large, relatively undisturbed landscapes with high scenic quality that are important for backcountry recreation. In backcountry areas, visitors feel as if they are in a natural place devoid of roads where they can explore, observe nature, and challenge themselves. Because these lands and waters are minimally disturbed, they provide clean drinking water and function as biological strongholds for populations of at-risk wildlife and plants. They also serve as buffers against the spread of non-native invasive plant species and serve as reference areas for study and research.

[bull] Backcountry areas will be managed for primitive, semi-primitive non-motorized ROS. Where motorized use has previously been designated through travel management planning, a semi-primitive motorized ROS may be appropriate. Management activities conducted within backcountry areas should be consistent with the scenic integrity objective of high.

### Standards:

[bull] A road shall not be constructed or reconstructed, unless the responsible official determines that a road is needed according to the circumstances allowed in the Roadless Area Conservation Rule (66 FR 3244).

[bull] Timber shall not be cut, sold, or removed, unless the responsible official determines that activities meet the circumstances provided in the Roadless Area Conservation Rule (66 FR 3244).

[bull] Mineral leasing and sales shall not be permitted.

Guidelines:

[bull] When developing the proposed action for a NEPA project, consider conducting restorative activities such as road decommissioning and mine reclamation within the project area to move towards desired conditions.

Suitability of Lands:

[bull] Not suitable for commercial timber activities.

[bull] Not suitable for road building.

[bull] Not suitable for mineral leasing and sales.

Recreation Focus Areas

We are very supportive of the Recreation Focus Area (RFA) concept as a management tool. Designating RFAs is a way for the forest plan to address specific areas where many different recreational uses are concentrated. An RFA designation is also appropriate for those places that provide premier opportunities for a single activity (such as a popular climbing area or ski resort).

RFAs receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable for the public to enjoy specific recreation opportunities and so that recreation uses do not degrade the natural environment. To this end, we suggest the following plan components for this designation:

Desired Conditions:

[bull] Places of special recreational significance are recognized and managed in a way that protects their unique settings and the sustainable place-based activities they support. Examples include climbing areas, backcountry skiing, or paddling destinations, and trails recognized as exemplary for mountain biking or hiking.

Guidelines:

[bull] Fire management within RFAs should strive to protect and preserve recreation infrastructure.

[bull] The Forest Service should work with local and national partners to maintain and develop the

recreation infrastructure (e.g. campgrounds, trails, river access sites, climbing anchors, and winter trailheads) necessary for the public to access and enjoy RFAs.

In addition to these general plan components, the OAGV includes specific Goal and Standard components for each RFA. Each RFA has geographically and physically unique features that draw recreationists, and the revised forest plan should describe desired conditions and provide management guidance for each area.

### Wild and Scenic River Eligibility

The Western Slope of Colorado has no designated Wild and Scenic Rivers, despite that the region is host to some of the nation's most prized free-flowing rivers and streams. To be eligible for Wild and Scenic designation, a stream must be free-flowing and have at least one "outstandingly remarkable value" (ORV) that is regionally or nationally significant. These ORVs are specific place-based values associated with recreation, scenery, geology, history, fisheries, culture, and other types of values.

Eligibility is important, as it ensures interim protection for these very special rivers and streams. The Wild and Scenic Rivers Act was signed into law in part to balance the nation's dam building efforts. Currently on Colorado's Western Slope, the Colorado, Gunnison, Taylor, San Miguel, and Uncompahgre Rivers are impacted by dams to varying degrees. In addition, trans-mountain diversions threaten the Gunnison River Basin, where many of the GMUG's last free-flowing rivers originate. A number of rivers within the GMUG are also threatened by historical and proposed mining operations. We believe that a robust inventory of each stream's eligibility for Wild and Scenic designation is justified, as well as required by law.

The Standards, Guidelines, and Suitability of Lands for river corridors with Wild and Scenic Eligibility status are outlined in the Wild and Scenic Rivers Act, the 2012 Planning Rule, and the Forest Service Handbook. Eligible river segments should be managed to protect their free-flowing character, their identified classification, and their ORVs. In addition, the Forest Service should consider dual protection for river corridors through Wilderness Designation and Wild and Scenic River Eligibility status where appropriate. Our Wild and Scenic River Eligibility recommendations are listed in Appendix A and B of this document.

### Other Designations

There are other designated area types referred to in this document and those are explained on a case-by-case basis in the recommendations that follow.

### Intersecting Community Proposals

In the process of seeking out consensus recommendations for the GMUG Forest Plan Revision, the Outdoor Alliance GMUG Vision reviewed various proposals that have been developed by other community groups. These

proposals include recommended designated areas on lands that possess outstanding ecological, aesthetic, or scenic qualities and have high-quality recreation opportunities.

It should be noted that some of these proposals have legislative ambitions. The OAGV has no stance on future or current legislation, and any endorsement of an act or proposal is only in the context of administratively designated areas for the Forest Plan revision process. Some proposals make recommendations for lands and waters beyond the boundaries of the GMUG National Forests. For the purposes of this document, an endorsement is only for the portions of a proposal affecting lands in the GMUG National Forests.

#### Endorsed Proposals

Some community proposals have been widely negotiated across many different geographic and interest communities and are endorsed by the OAGV. An endorsement does not preclude the OAGV, or an individual group in this coalition, from making additional recommendations in an area considered by a given proposal. Any additional recommendations are detailed in the specific recommendations below. The full proposals endorsed by the OAGV include:

- [bull] The Gunnison Public Lands Initiative,<sup>22</sup>
- [bull] San Juan Mountains Wilderness Act,<sup>23</sup> and
- [bull] Thompson Divide Withdrawal and Protection Act.<sup>24</sup>

#### Support for Individual Recommendations from Non-Endorsed Proposals

Other proposals contain recommendations that would in some cases positively and other cases negatively affect recreation in the GMUG National Forests. From the proposals with mixed impacts on outdoor recreation, the OAGV has highlighted and supports the individual recommendations which enjoy consensus support from the human-powered recreation community. These individually supported designated areas are each listed and discussed in the recommendations below. The full proposals and the recommendations not listed in the following section are not endorsed. The proposal(s) where the OAGV has chosen to endorse some but not all of the proposal(s) recommendations include:

- [bull] The GMUG Citizens[rsquo] Conservation Proposal<sup>25</sup>

It should be noted that the OAGV and GMUG Citizens[rsquo] Conservation Proposal are discussing adjustments to the GMUG Citizens[rsquo] Conservation Proposal that would reduce any negative impacts to recreation and hopefully lead to consensus support of additional recommendations from the larger proposal.

## Recommendations Unique to the Outdoor Alliance GMUG Vision (OAGV)

As referenced above, some of the designated area recommendations which follow have been sourced from existing community proposals either fully or partially endorsed by the OAGV, but many are recommendations that are unique to the OAGV and have been developed through the collaborative consensus process of this document's contributors. The source of a recommendation is listed in the details of each designated area in this document.

22 [Idquo]January 2019 Proposal.[rdquo] Gunnison Public Lands Initiative, [www.gunnisonpubliclands.org/gpli-proposal](http://www.gunnisonpubliclands.org/gpli-proposal). 23 [Idquo]San Juan Mountains Wilderness Proposed Protections.[rdquo] San Juan Citizens Alliance, [www.sanjuanwilderness.org/#container-2359](http://www.sanjuanwilderness.org/#container-2359).

24 [Idquo]Thompson Divide Coalition.[rdquo] Thompson Divide Coalition, [www.savethompsondivide.org/](http://www.savethompsondivide.org/).

25 [Idquo]GMUG Citizens Conservation Proposal.[rdquo] GMUG Citizens Conservation Coalition, [www.gmugrevision.com/maps/](http://www.gmugrevision.com/maps/).

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## Recommendations for the Grand Mesa National Forest

### Mesa Top Recreation Focus Area

Source: Outdoor Alliance GMUG Vision

### Location/Boundaries

Located on the central and western portions in the upper elevations of the Grand Mesa, predominantly west of Hwy 65, including Whitewater Creek drainage.

### Background

The Mesa Top Recreation Focus Area comprises Mesa Top, the Palisade Plunge, Crane Lake, Deep Creek,

Whitewater Basin, Rim View, West Bench, Drop Off, Point Camp, the County Line Trail System, and multiple other minor singletrack connectors and doubletrack routes. The trail system is a diverse mix of historic routes and recently constructed purpose-built trails. The proximity to multiple municipal areas and expanding recreation interests in this region has resulted in moderate growth of trail-based recreation activity, along with hunting, fishing, camping, cross-country skiing, snow-biking, and multiple motorized sports. The trail network receives moderate to minimal maintenance activity across the total system mileage.

## Goals

[bull] Maintain and expand backcountry and mid-country trail access, including access out of the forest and off of the flanks of the Mesa.

[bull] Develop a long-term trail expansion plan that accommodates increasing human-powered recreation user numbers.

[bull] Create and improve connectivity between existing routes to better utilize existing trail resources, while creating a diverse network of new route opportunities of varying mileage and skill level.

[bull] Through planning processes, provide for future out-of-area connectivity, such as long- distance routes, that may connect to nearby or regional trail-based recreation areas.

[bull] Expand visitor amenities such as parking, bathroom, and fresh water at suitable trailhead locations.

[bull] Plan and provide for expanded maintenance and stewardship activities across the trail system.

[bull] Create new winter bike access opportunities.

## Recommendations

[bull] Manage as a designated recreation focus area.

[bull] Preserve access to existing human-powered trails.

[bull] Expand trail mileage and connectivity through new route creation to improve use of existing resources and provide new opportunities.

[bull] For planning and maintenance activities, emphasize conservation and stewardship of trail resources through partnerships with stewardship organizations.

[bull] Provide for routine maintenance, allow opportunities for re-route/re-alignment to improve trail sustainability where conditions allow.

[bull] Conduct comprehensive monitoring to understand current visitor use, changes over time, and potential resource impacts from increasing recreation.

[bull] Conduct long-term trail planning to determine the need for new trail opportunities and proper placement of trails to meet increasing demand.

#### Kannah Creek Backcountry Area

Source: Outdoor Alliance GMUG Vision

#### Location/Boundaries

Located on the southwestern portion in the upper elevations of the Grand Mesa, generally south of Lands End Road and encompassing the Coal Creek and Kannah Creek basins.

#### Background

The Kannah Creek Backcountry Area comprises approximately 34,600 acres of terrain, including the Coal Creek

and Kannah Creek basins, the headwaters feeding the Grand Junction watershed. The area is highly valued for its current and planned non-motorized recreation opportunities including Flowing Park, portions of Indian Point, Spring Camp, Kannah Creek, Coal Creek, a portion of the Palisade Plunge, and other trails. In addition to trail-based recreation, the Kannah Creek watershed is valued by anglers for its populations of cutthroat, rainbow, and brook trout. There are also Class V and Class III kayaking opportunities on Kannah Creek, just downstream of the Forest Service boundary.

Importantly, the Kannah Creek watershed is the principal source for the City of Grand Junction's municipal water supply. Together, recreation opportunities and watershed health will directly benefit from improved management of land and water resources in the headwaters of the Kannah Creek drainage. Protection of watershed health and outdoor recreation opportunities can be complementary, but careful planning and monitoring are warranted to manage this area, which supports critical wildlife habitat and local economies based on outdoor recreation, scenic tourism, and agriculture.

## Goals

- [bull] Preserve and enhance watershed health.
  
- [bull] Maintain and expand backcountry trail access, including access out of the forest and off the flanks of the Grand Mesa.
  
- [bull] Develop a long-term trail expansion plan that accommodates for increasing human- powered recreation users.
  
- [bull] Create and improve connectivity between existing routes to better utilize existing trail resources, while creating a diverse network of new route opportunities of varying mileage and skill level.
  
- [bull] Through planning processes, provide for future out-of-area connectivity, such as long- distance routes, that may serve to connect to nearby or regional trail-based recreation areas.
  
- [bull] Plan and provide for expanded maintenance and stewardship activities across the trail system.
  
- [bull] Create new winter bike access opportunities.

## Recommendations

- [bull] Manage as a designated as a Backcountry Area.
  
- [bull] Limit travel in the area to non-motorized users.
  
- [bull] Support and plan for watershed protection within the Kannah Creek drainage through existing trail improvements and maintenance and planned human-powered trail development.
  
- [bull] Preserve access to existing human-powered trails. Expand trail mileage to provide new opportunities and improve use of existing resources through trail connectivity.
  
- [bull] For planning and maintenance activities, emphasize conservation and stewardship of trail resources through partnerships with stewardship organizations.
  
- [bull] Provide for routine maintenance, allow opportunities for re-routing/re-alignment to improve trail sustainability where conditions allow.
  
- [bull] Conduct comprehensive monitoring to understand current visitor use, changes over time, and potential resource impacts from increasing recreation, with special emphasis on watershed quality.
  
- [bull] Conduct long-term trail planning to determine the need for new trail opportunities and proper placement of trails to meet increasing demand.

Turkey Flats/Pinon Mesa Recreation Focus Area

Source: Outdoor Alliance GMUG Vision

## Location/Boundaries

Located in the upper elevations of the Pinon Mesa, this 7,400-acre area includes small reservoirs and is transected by MS Road. The area is readily accessible to the nearby communities of Glade Park, Fruita, and Grand Junction.

## Background

The Turkey Flats/Pinon Mesa RFA is characterized by easy access from the cities of Grand Junction and Fruita, and includes an existing low mileage human-powered trail system, nearby reservoirs, picnic, and camping areas that are frequented for day and overnight use activities. The Haypress, Turkey Flats, and Black Pine human-powered trails intersect with multiple motorized access routes throughout the area. Proximity to local municipalities and higher elevations that offer seasonally cool temperatures make this area uniquely attractive to local recreational day use activities. This area's small size has not kept pace with increased recreation use, and an increase in trail mileage and user amenities is needed to accommodate user interest and visitation. Partnering with the City of Fruita, which maintains ex-municipal water supply reservoirs in this area, will be key to developments within this unit.

## Goals

- [bull] Maintain access to existing human-powered trails and plan for a substantial increase in visitor use.
  
- [bull] Through planning processes, expand the existing trail system, while creating a diverse network of new route opportunities of varying mileage and skill level.
  
- [bull] Mitigate the impacts of increased visitation by expanding visitor amenities, such as parking, bathroom, and fresh water at suitable trailhead locations.
  
- [bull] Plan and provide for expanded maintenance and stewardship activities across the trail system.
  
- [bull] Create new winter biking access opportunities.

## Recommendations

- [bull] Designate as a Recreation Focus Area.
  
- [bull] Preserve access to existing human-powered trails.
  
- [bull] Conduct comprehensive monitoring to understand current visitor use, changes over time, and potential resource impacts from increasing recreation.
  
- [bull] Conduct long-term trail planning to determine the need for new trail opportunities and proper placement of trails to meet increasing demand.
  
- [bull] Expand trail mileage and connectivity through new route creation to improve use of existing resources and provide new opportunities.
  
- [bull] For planning and maintenance activities, emphasize conservation and stewardship of trail resources through partnerships with stewardship organizations.

## Recommendations for the Uncompahgre National Forest

### Ouray Backcountry Area

Source: Outdoor Alliance GMUG Vision

### Location/Boundaries

This area is located between proposed wilderness areas in the San Juan Mountains Wilderness Act and north of the Sneffels Wilderness Area. The Alder Creek/Dallas trail traverses the entirety of this section with wilderness above it. The western boundary abuts the Sneffels Wilderness Area and the eastern boundary is framed by the Uncompahgre River. The majority of the area is between 8,500 feet and 9,500 feet in elevation.



## Background

Ouray Backcountry Area is prime habitat for elk and deer during spring, summer, and fall months as well as lynx habitat in the winter months. This area historically has been used by hikers, backcountry and Nordic skiers, and horseback riders. In fact, the first ski hut in Colorado, which was located in Blaine Basin, was accessed through this area via the historic Dallas Trail. San Juan Huts has operated backcountry huts in this zone used by backcountry and Nordic skiers and hikers since 1987. It is also a heavily used hunting area. The Dallas Trail is also one of the few trails in the area that is appropriate for horses, as many of the other trails in the Ouray area have too much exposure or are too steep. For this same reason, mountain bikers have started to use the western section of the Dallas trail in recent years.

## Goals

- [bull] Protect historic wildlife habitat.
  
- [bull] Maintain the remote and wild feel of the Dallas Trail.
  
- [bull] Provide an appropriate buffer between wilderness areas and private lands.

## Recommendation(s)

- [bull] Manage area as designated Backcountry Area.
  
- [bull] Preserve current motorized use.
  
- [bull] Limit new designated route development to trail classes suitable for primitive and semi- primitive ROS and non-motorized travel.

Kelso Mesa Recommended Wilderness Area

Source: GMUG Citizens' Conservation Proposal

#### Location/Boundaries

Located in the northern portion of the Uncompahgre National Forest, Kelso Mesa encompasses 36,000 acres. This area includes the North Fork and Middle Fork of Escalante Creek drainages.<sup>26</sup>

#### Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV without modification.

#### UnawEEP Recommended Wilderness Area

Source: GMUG Citizens' Conservation Proposal

#### Location/Boundaries

The UnawEEP Recommended Wilderness Area is 11,000 acres in the northwest corner of the Uncompahgre National Forest. This area borders the forest boundary to the north and west and the UnawEEP Trail to the south and east.<sup>27</sup>

#### Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV without modification.

#### Hayden Mountain Recommended Wilderness Area

Source: GMUG Citizens' Conservation Proposal

26 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

27 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

#### Location/Boundaries

Hayden Mountain Recommended Wilderness Area is 8,300 acres<sup>28</sup> that includes Hayden Mountain and surrounding area, located between Ouray County Road 361 and Hwy 550 just south of Ouray.

#### Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV with additional recommendations.<sup>29</sup>

#### Additional Management Recommendation(s)

[bull] Issue a determination for the use of chainsaws [ndash] up to two times per year to clear existing trails of deadfall [ndash] meets the [ldquo]minimum requirements for the administration of the area for the purpose of this Act[rldquo] standard in Section 4 (c) of the 1964 Wilderness Act.

#### Uncompahgre Plateau North Recreation Focus Area

Source: Outdoor Alliance GMUG Vision

## Location/Boundaries

This area is located in the northern portion of the Uncompahgre Plateau, encompassing the Unaweep Rim, Bear Canyons, Blue Creek, Little Creek, and Ute Creek areas.

## Background

The Uncompahgre Plateau is prized by sportsmen, backcountry mountain bikers, and other human-powered recreationists. There have been increasing levels of motorized use in this part of the district, as well as significant commercial timber harvest. Protecting hunting and human-powered recreation opportunities on this landscape should be an important factor in planning decisions. The Unaweep Rim, Bear Canyons, Blue Creek, Little Creek, and Ute Creek areas are currently popular for non-motorized opportunities. The proximity to Grand Junction and the higher elevation provide an escape from the summer heat. This area will increase in popularity as the population of the Grand Valley grows, and increased opportunities here should be factored in to planning decisions.

## Goals

[bull] Meet the increased demand for non-motorized recreation on the Uncompahgre Plateau.

28 The proposed RWA surrounds some private inholdings, and the final acreage may vary from the acreage number provided.

29 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

[bull] Provide more opportunities for non-motorized recreation on the north end of the Uncompahgre Plateau, which is easily accessible from Grand Junction and the greater Grand Valley.

[bull] Improve the condition of existing non-motorized trails.

[bull] Modify existing motorized trails to be more sustainable and suitable for non-motorized recreation.

## Recommendations

- [bull] Manage area as Recreation Focus Area.
  
- [bull] Prioritize for development of a non-motorized trail system on the north end of the Uncompahgre Plateau that offers a variety of trail experiences for different user groups.
  
- [bull] Devote more resources to upgrading existing non-motorized trails.
  
- [bull] Reroute steep, unsustainable sections of existing motorized trails to make these trails more suitable for non-motorized recreation.

## Uncompahgre Plateau South Recreation Focus Area

Source: Outdoor Alliance GMUG Vision

## Location/Boundaries

This area is located in the southern portion of the Uncompahgre Plateau and southeast of Love Mesa. Dave Wood and Sanborn Park roads form the southern boundary.

## Background

The majority of the trails in this area are open to motorized use. There are numerous rocky ATV doubletrack trails that are not appealing to mountain bikes, as well as singletrack dirt bike trails with unsustainable steep grades that are not suitable for mountain biking. Nevertheless, this area has seen a substantial increase in mountain biking in the past several years, and the trails in this area of the forest are not meeting the increased demand. Since the revision of the Uncompahgre National Forest (UNF) Travel Plan, a handful of trails have been designated as non-motorized and open to mountain bikes. Attempts to increase the mileage of mountain bike trails have been denied by the Forest Service. Two non-motorized trails, FSR 115 (Simm's Mesa) and 251 (Old Transfer), are too short to be of interest to mountain bikers. FSR 403 (47 Trail), 544.1A (Tabaguache 25 Mesa),

and 124.1A (S. Bear Pen Gulch) can be combined with existing motorized trails to create suitable loops. In two instances, forest routes connect directly with trail systems on

BLM managed lands [ndash] FSR 255 (Cushman) and 116.1C (Lower Spring Creek). In addition, the Tabeguache Trail, a long-distance trail that connects Grand Junction and Montrose, travels across the Uncompahgre Plateau through the Uncompahgre. Local non-governmental organizations have been aiding the Forest Service for the last 20 years with maintenance of the Uncompahgre Plateau[rsquo]s non-motorized trails. Generally, these trails suffer from neglect.

#### Goals

- [bull] Meet the increased demand for non-motorized recreation on the Uncompahgre Plateau.
- [bull] Provide more opportunities for non-motorized recreation on the south end of the Uncompahgre Plateau. Ideally, these opportunities would connect with existing trail systems on adjacent BLM-managed lands.
- [bull] Improve the condition of existing non-motorized trails.
- [bull] Modify existing motorized trails to be more sustainable and suitable for non-motorized recreation.

#### Recommendations

- [bull] Manage area as Recreation Focus Area.
- [bull] Prioritize for development of a non-motorized trail system on the south end of the Uncompahgre Plateau that offers a variety of trail experiences for different user groups.
- [bull] Devote more resources to upgrading existing non-motorized trails.
- [bull] Reroute steep, unsustainable sections of existing motorized trails to make these trails more suitable for non-motorized recreation.

#### Abrams/Browns Backcountry Area

Source: GMUG Citizens[rsquo] Conservation Proposal

#### Location/Boundaries

The Abrams/Browns Backcountry Area includes 3,000 acres stretching across the upper elevations of Brown Mountain and Abrams Mountain to the south of Ouray on the east side of HWY 550 and to the south of the Uncompahgre River.<sup>30</sup>

#### Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV with additional recommendations.

30 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

#### Additional Management Recommendation(s)

[bull] Prioritize non-motorized recreation and initiate local process to determine the feasibility of developing a new trail along or near the ridgeline bisecting the area.

#### San Juan Mountains Wilderness Protection Areas

Source: San Juan Mountains Wilderness Act

#### Location/Boundaries

The San Juan Mountains Wilderness Act area includes recommendations for multiple designated areas protecting 60,000 acres in the heart of the San Juan Mountains.

## Background

The designated areas in the San Juan Wilderness Act protect landscapes important for both recreation and conservation and reflect an exceedingly high degree of stakeholder negotiation and consensus. Given the robust process reflected in the development of this proposal, we believe the proposal should be reflected in the Forest Plan.

The San Juan Mountains Wilderness Act proposal preserves existing access to human-powered recreation while protecting an incredibly beautiful area for future generations. The proposal has bipartisan support and is endorsed by multiple counties, towns, businesses, recreation groups, and nonprofits.<sup>31</sup>

## Goals

- [bull] Double the size of the Mount Sneffels Wilderness Area.
  
- [bull] Create a special management area around Sheep Mountain and Ice Lake Basin.
  
- [bull] Wilderness additions near the Lizard Head Wilderness boundary.
  
- [bull] Protect community water sources in Naturita Canyon.

## Recommendations

- [bull] Existing trails will remain open to the public and maintained under their current allowed uses.
  
- [bull] Areas and trails that are currently non-motorized will stay non-motorized.



[bull] In portions of the proposed Wilderness Act, there shall be no new trail construction to ensure that areas currently without trails maintain their remote, pristine, and wild backcountry character.

[bull] As recreational use increases in the San Juan Mountains, the Forest Service should consider areas outside of these proposed boundaries for new trails and recreation opportunities.

[bull] Consider stacked trails and loops outside of the current and proposed wilderness areas to broaden recreation opportunities where recreation is already allowed and currently exists. Cohesive and inclusive trail systems, as compared to individual trails, have the ability to accommodate more users and offer the necessary infrastructure to allow for future recreation growth. Well-rounded trail systems are necessary to improve recreation opportunities within the GMUG, allow for future growth of human-powered recreation, and protect the surrounding environment.

#### Telluride Recreation Focus Area

Source: Outdoor Alliance GMUG Vision

#### Location/Boundaries

The Telluride Recreation Focus Area encompasses the region surrounding the towns of Telluride and Mountain Village. To the north and west of Telluride, the recreation focus area abuts proposed recommended wilderness areas, and to the south the area borders the proposed Sheep Mountain Special Management Area. All non-Forest Service land surrounding Telluride, Mountain Village, and other satellite communities are excluded from the Telluride Recreation Focus Area.

#### Background

There is a growing demand for recreation opportunities in the Uncompahgre National Forest. Trail and public land use, as well as tourism, is dramatically increasing in areas surrounding the towns of Telluride and Mountain Village. The region's complicated land boundaries, ownership, and topography have hampered progress to

create new recreation opportunities, especially trails, in this region. Management of this area with a focus on recreation will help prioritize new and properly proposed trails, better infrastructure, stacked loop systems, and other key recreation components. New trails and increased recreation opportunities are needed to help disperse use and proactively address user conflicts.

## Goals

[bull] Identify high-use recreation areas and prioritize locations that can accommodate increased recreation use.

[bull] Create connectivity between existing routes to improve current trail system.

[bull] Through planning processes, expand the existing trail system while creating a diverse network of new route opportunities of varying mileage and skill level.

[bull] Develop a master trail plan to accommodate for future growth and disperse trail users, especially as current trails become more popular.

[bull] Create recreation resources and infrastructure near communities that will benefit from an outdoor recreation economy.

## Recommendations

[bull] Manage as a designated Recreation Focus Area.

[bull] Plan accordingly for future recreation growth and trail overcrowding by creating new recreation opportunities that can accommodate more recreationists.

[bull] Prioritize stacked loop trails in locations where recreation infrastructure currently exists (e.g. where

trails already exist, where trails are easily accessible, near campgrounds, near parking and trailheads, near communities that will benefit economically from increased recreation).

[bull] Provide a blueprint for local partners to assist with trail planning, the National Environmental Policy Act (NEPA) process, and trail construction in the area.

[bull] Conduct comprehensive monitoring to understand current visitor use, changes over time, and potential resource impacts from increasing recreation.

#### Lone Cone/Beaver Park Backcountry Area

Source: Outdoor Alliance GMUG Vision

#### Location/Boundaries

Lone Cone/Beaver Park is identified as the area surrounding (north, south, east and west) Lone Cone Peak and east to Beaver Park. This general vicinity is located south of the town of Norwood, southwest of the towns of Placerville and Sawpit, and west of Mt. Wilson. The main access to Lone Cone/Beaver Park is via the town of Norwood.

#### Background

The Lone Cone and Beaver Park areas are remote backcountry landscapes with ample opportunity for primitive and semi-primitive recreation including backcountry skiing, hunting and hiking. The areas are not contiguous, but they are proximate and their boundaries exclude the area of motorized recreation that lies between the two. There is a need for increased recreation opportunities in the Uncompahgre National Forest near the towns of Telluride and Norwood. The Lone Cone/Beaver Park area currently does not have any trail infrastructure and is a prime location for expanded recreation opportunities. For this reason, the OAGV recommends designating the area as a Backcountry Area.

## Goals

[bull] Create cohesive trail systems with more opportunities for trail connections and loops in areas that already have trails.

[bull] Provide foresight for opportunities for new trail systems in the future when overcrowding begins on the current trail systems.

[bull] Allow for additional trail options for varying levels of recreationists.

[bull] Create a plan to disperse trail users, especially as current trails are becoming vastly more popular.

[bull] Create trail systems near communities that will benefit from recreation economics.

## Recommendations

[bull] Manage as a designated Backcountry Area.

[bull] Create more opportunities for recreation using stacked-loop trails in certain locations where it makes sense while maintaining a remote backcountry feel.

[bull] Plan efficiently for future recreation growth and trail overcrowding.

[bull] Allow for more than one trail in identified areas which can broaden use for multiple recreation levels, help establish recreation hubs, and accommodate more recreationists.

[bull] Conduct comprehensive monitoring to understand current visitor use, changes over time, and resource impacts from increasing recreation.

[bull] Emphasize conservation and stewardship of all trail resources through partnership with stewardship organizations for planning and maintenance activities.

#### Uncompahgre Wild and Scenic River Eligibility Recommendations

See Appendix A for detailed Wild and Scenic River Eligibility Recommendations in the Uncompahgre National Forest.

#### Recommendations for the Gunnison National Forest

##### Gunnison Public Lands Initiative

Source: Gunnison Public Lands Initiative January 2019 Proposal

#### Location/Boundaries

The Gunnison Public Lands Initiative proposal includes recommendations for multiple designated areas protecting 452,221 acres of land in the Gunnison County.<sup>32</sup>

#### Background

The designated areas in the Gunnison Public Lands Initiative (GPLI) protect landscapes important for both recreation and conservation. These designations are endorsed by the OAGV with additional management recommendations for inclusion in the GMUG Forest Plan Revision. The OAGV does not take a position on legislation nor the legislative intent of the GPLI.

Since 2016, the Gunnison Public Lands Initiative (GPLI), a coalition of ten organizations, has worked to find consensus among many interests: ranching, water use, motorized recreation, conservation, mountain biking, hunting, and angling. The GPLI arrived at consensus-based recommendations for protecting key public lands, enhancing a strong and sustainable economy, and supporting historic uses of public lands in and around Gunnison County using wilderness or special management area designations. Their recommendations reflect years of work and difficult, but principled, compromises made by every organization participating in the process.

We are supportive of the GPLI and collaborative projects like these, but also recognize that not all issues or

specific recreation types can be included in every coalition. We have included additional recommendations specific to river recreation in the Gunnison National Forest, as well as recommendations for multiple designations outside of Gunnison County.

We also want to emphasize that the GPLI recommendations do not substitute for winter travel management planning under the revised travel planning rule. We recommend that comprehensive winter travel management planning be initiated in all areas of the GMUG, including in the Gunnison Basin. The GPLI's acknowledgement of existing winter travel in the areas considered in the proposal should not presuppose either access nor restrictions in the travel management planning process.

32 <https://www.gunnisonpubliclands.org/gpli-proposal>

The OAGV scope is solely the GMUG Forest Plan Revision and our support of the GPLI is made only in this context. As previously noted, the OAGV has no position on legislation including any legislation that may result from the GPLI process.

#### Additional Management Recommendation(s)

[bull] See river segment management recommendations below.

#### Slate River Valley Management Recommendations

Source: Outdoor Alliance GMUG Vision

#### Background

The Slate River Valley is home to some of the Western Slope's most prized paddling rivers and creeks, including Oh-Be-Joyful Creek, the Upper Slate River, Daisy Creek, and the North Fork of the Slate River.

These river reaches attract paddlers from around the country. The Slate River watershed and its surrounding landscape is threatened by historical and potential future mining use.

Improved management is needed to

protect water quality on these river reaches and preserve the surrounding environment, while enhancing access for human-powered recreation.

#### Goals

[bull] Maintain existing river access areas and identify potential new and improved river access locations and attributes where appropriate.

[bull] Identify paddling as a management priority throughout the Slate River Valley to the extent possible by the Forest Service.

[bull] Protect the many ORVs in the Slate River Valley, including but not limited to recreation, wildlife, botanical, and scenery.

[bull] Protect and improve primitive and dispersed camping opportunities in the area and improve infrastructure where necessary to reduce environmental impact.

#### Recommendations

[bull] Determine segments of Oh-Be-Joyful, Daisy Creek, Upper Slate, and North Fork Slate as Eligible for inclusion in the National Wild and Scenic River System (See Appendix B).

#### East River Corridor Management Recommendations

Source: Outdoor Alliance GMUG Vision

## Background

The Upper East River watershed provides unique human-powered paddling opportunities, is host to world renowned wildlife and botanical ecosystems that are used for scientific research, and attract visitors throughout and beyond Colorado. We recommend managing for low-impact, human-powered forms of recreation within the

area. Specifically, in the East River corridor from the Gothic Road Bridge to below Stupid Falls (60-foot cascading waterfall), there are paddling opportunities that are highly sought after and frequented. Paddling is a recreation niche that is sustainable, low-impact, and wilderness-compatible. Paddling and other forms of human-powered recreation can coexist with ongoing biological research in the area. Management of this area should prioritize scientific research and paddling opportunities.

## Goals

- [bull] Identify potential new and improved river access locations and attributes, while maintaining the primitive character of the river segment.

- [bull] Identify paddling as a management priority in the East River corridor.

- [bull] Protect the many ORVs in the East River Valley, including but not limited to recreation, wildlife, botanical, and scenery.

## Recommendations

- [bull] Determine the Upper East River as Eligible for inclusion in the National Wild and Scenic River System (See Appendix B).

- [bull] Establish improved parking and trails at the put in and take out for the Upper East River (e.g. at or above the East River Bridge and both above and below Stupid Falls).



Source: Outdoor Alliance GMUG Vision

## Background

We recommend that paddling and climbing opportunities be protected in the Taylor River Corridor from the headwaters of the Taylor to Taylor Park Reservoir and between the reservoir and Almont.

Upstream of Taylor Park Reservoir, there are scenic Class II-III paddling opportunities. Between the reservoir and Almont, the Taylor River Canyon offers

very popular Class II to IV boating opportunities, in addition to high-quality climbing crags in the corridor. Both commercial and private recreation in the Taylor River Canyon contribute to the local economy and these recreation opportunities depend on quality river access, healthy riparian habitat, and healthy instream flows.

## Goals

[bull] Identify potential new and improved river access infrastructure where appropriate.

[bull] Enhance opportunities for human-powered recreation in the Taylor River corridor, including paddling, climbing, hiking, biking, and fishing.

[bull] Protect the many ORVs in the Taylor River corridor, including but not limited to recreation, and scenery.

## Recommendations

[bull] Determine the Taylor River as Eligible for inclusion in the National Wild and Scenic River System (See Appendix B).

[bull] Create additional access points and access trails on the Taylor River between CR 748 and Taylor

Park Reservoir.

West Elk Backcountry Area

Source: Outdoor Alliance GMUG Vision

#### Location/Boundaries

This area is located between Coal Mountain and Curecanti Creek and along the western boundary of the West Elk Wilderness.

#### Background

The West Elk Backcountry Area comprises about 90,000 acres of rugged terrain, and more than 50 miles of non-motorized singletrack in the Coal Mountain, Mendicant Ridge, Dyer Creek, Black Mesa, and Curecanti Creek area. The remote area is a less used portion of the Gunnison National Forest, however, it sees sportsmen use, along with mountain biking, hiking, and equestrian use. The trails in the area range from primitive backcountry trails to heavily-used access trails. The area sees little trail maintenance and lacks regular stewardship and management, especially in the Mendicant area. The Piburn Trail serves as the southern non-motorized trail connection between the Gunnison Basin and the Crawford/Hotchkiss/Paonia areas, while the Lamborn and Little Elk Basin trails serve as northern trail connectors in the area.

#### Goals

[bull] Maintain the high-quality backcountry and quiet use area that it is currently and provide further stewardship and maintenance efforts.

[bull] Provide a sustainable non-motorized route to connect with Delta County.

[bull] Provide a sustainable non-motorized connection from Gunnison to the far west reach of the Gunnison National Forest, the Kebler pass area, and the Raggeds Area.

[bull] Complement the Thompson Divide Withdrawal and Protection Areas with recreation- focused Special Management Area directives.

#### Recommendations

[bull] Designate as a Backcountry Area.

[bull] Preserve access to existing non-motorized trails, including mountain bikes.

[bull] Emphasize conservation and maintaining the wild and remote feel of the area while allowing for routine maintenance, opportunities for re-route/re-alignment for better trail sustainability, and connectivity for enhanced access.

[bull] Provide protections for buffer areas between West Elk Wilderness Area and Thompson Divide Withdrawal and Protection Areas.

[bull] Pursue future withdrawal from location and entry under the United States mining laws.

#### Sawtooth Recommended Wilderness Area

Source: GMUG Citizens[rsquo] Conservation Proposal

#### Location/Boundaries

The Sawtooth recommended Wilderness area is located in Saguache County, about 15 miles south of Gunnison and west of Highway 114. The recommended wilderness area is bounded by Forest Service Road 806 to the south, Forest Service Road 854 to the east, Forest Service Road 775 to the north, and the Gunnison National Forest boundary to the west. This area was proposed for wilderness designation in the draft GMUG Forest Plan (2007) and it overlaps the Sawtooth Colorado Roadless Area.<sup>33</sup>

## Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV without modification.

## Chalk Mountain Recommended Wilderness

Source: GMUG Citizens' Conservation Proposal

## Location/Boundaries

The Chalk Mountain recommended wilderness area overlaps Gunnison and Grand Mesa National Forests and includes public lands in Delta and Mesa counties. It is located north of Overland Reservoir and is generally bounded by Buzzard Creek / Buzzard Park Trail (FS #519) to the north, Willow Creek / Monument Trail (FS #518) on the western side, and overlaps the Mule Park Important Bird Area to the east.<sup>34</sup>

## Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV without modification.

33 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

34 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

## Mule Park Important Bird Area

Source: GMUG Citizens' Conservation Proposal

#### Location/Boundaries

The recommended Mule Park Important Bird Area (IBA) is located north of Paonia and to the east of the proposed Chalk Mountain recommended wilderness. The Mule Park IBA includes three separate units that are located in Gunnison, Mesa, and Delta counties.<sup>35</sup>

#### Background

This recommendation was developed by the GMUG Citizens' Conservation Proposal, protects a landscape important for both its recreation and conservation values, and is endorsed by the OAGV without modification.

#### Gunnison Wild and Scenic River Eligibility Recommendations

See Appendix B for detailed Wild and Scenic River Eligibility Recommendations in the Gunnison National Forest.

35 <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

#### Outdoor Alliance GMUG Vision Contributors

Outdoor Alliance worked with local conservation and recreation leaders across the GMUG National Forests. We would like to sincerely thank the individuals and organizations that informed the creation of the OAGV. Inclusion in the list of contributors does not indicate the individual or organization endorses the final OAGV document.

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#### Special Thanks

The creation of the Outdoor Alliance GMUG vision would not have been possible without the generous support of our foundation and corporate partners including the Gates Family Foundation and Patagonia. Inclusion in the list of contributors does not indicate endorsement of the final OAGV.

#### Appendix A

Wild and Scenic River Eligibility Recommendations for the Uncompahgre National Forest

1. San Miguel (Keystone Canyon and Sawpit)<sup>36</sup>

[bull] Recommendation: The San Miguel

should be found eligible, Recreation ORV, Recreation Classification

[bull] Tributary of: Dolores River

[bull] Keystone to Forest Service (FS)-Bureau of Land Management (BLM) boundary

[bull] Free-flowing: Yes. This segment of the San Miguel river is free-flowing with no impoundments or man-made structures.

[bull] ORVs:

o Recreation. Keystone Canyon has been described as the best creekboating option in the area, providing a class V- to V+ boating experience unlike anywhere else in the San Miguel drainage.<sup>37</sup> Keystone Canyon starts 3.5 miles downstream of Telluride and ends at the Bilk Creek access point. Downstream of Bilk Creek is a Class II-III stretch of river frequently described as having quality whitewater and incredibly scenic views.<sup>38</sup>

[bull] Additional Comments:

o This segment abuts the BLM segment of the San Miguel (27.2 miles from the Forest Service boundary near Lime to downstream of Norwood), which was determined to be eligible (and suitable) by the BLM Uncompahgre Field Office.<sup>39</sup> This segment of the San Miguel River is the longest segment within the Forest Service boundary and also the most scenic and unique.

o On the Norwood Canyon segments of the San Miguel that are proposed eligible in the Draft Wild and Scenic River Eligibility Evaluation, the Forest Service should add an additional river campground. Upstream, at the Bilk Creek put-in for the [ldquo]Sawpit[rdquo] segment, the USFS should improve the access area. The Bilk Creek put-in is a common access point for paddlers and it currently lacks the necessary infrastructure to support the amount of use. We recommend improving the turn-around area for trailers, including additional signage about the access point and

36 Photo retrieved from <https://www.sanmiguelcountyco.gov/197/Parks-Open-Space>

37 Stafford and McCutchen, *Whitewater*, 202.

38 <https://westerncooutdoors.com/archives/3002>

39 [https://eplanning.blm.gov/epl-front-office/projects/lup/62103/78805/90472/WSR\\_Suitability\\_Report\\_Final\\_04272012.pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/62103/78805/90472/WSR_Suitability_Report_Final_04272012.pdf)

the river segment, and adding signage on the highway directing people to the put-in.

[bull] Classification: Recreational. Sections of the San Miguel River are paralleled by Highway 145 and



the river is intersected by CR 63L.

[bull] Additional Resources:

- o AW River Inventory Page: San Miguel Box

## 2. San Miguel Segment 1

[bull] Recommendation: San Miguel Segment 1 should be found eligible, Recreation & Scenery ORVs, Recreational Classification

[bull] Tributary of: Dolores River

[bull] Length: 0.08 miles

[bull] Free-flowing: Yes. This segment of the San Miguel meets the requirements for free-flowing.

[bull] ORVs:

- o Recreation. We agree with the Recreation ORV for paddling on this segment of the San Miguel. This segment is part of the popular class II-III paddling stretch between Specie Creek and Beaver Creek.

- o Scenery. We agree with the Scenery ORV for this segment. This stretch abuts the Uncompahgre Plateau and provides unique views of the plateau.

[bull] Classification: Recreational.

[bull] Additional Resources:

- o AW River Inventory Page: San Miguel River Specie to Beaver Creek

## 3. San Miguel Segment 2

[bull] Recommendation: San Miguel Segment 2 should be found eligible, Recreation & Scenery ORVs, Wild Classification

[bull] Tributary of: Dolores River

[bull] Length: 0.37 miles

[bull] Free-flowing: Yes. This segment of the San Miguel meets the requirements for free-flowing.

[bull] ORVs:

- o Recreation. We agree with the Recreation ORV for paddling on this segment. It is part of the popular and scenic class III paddling stretch known as Norwood Canyon. People travel from around the state to commercially raft this stretch of river.

o Scenery. We agree with the Scenery ORV for this segment. This segment has been described as a [ldquo]largely roadless, wooded canyon[rdquo] and provides a very

unique opportunity to experience a transition in landscapes between the alpine environment of Telluride to the desert environment of Naturita.<sup>40</sup>

[bull] Classification: Wild. We agree with the preliminary classification of Wild.

[bull] Additional Resources:

o AW River Inventory Page: Beaver Creek to Pi[n]tilde]on Bridge

#### 4. Uncompahgre River (Uncompahgre Gorge)

[bull] Recommendation: The Uncompahgre River should be found eligible, Recreation & Scenery ORVs, Scenic Classification

[bull] Tributary of: Gunnison River

[bull] Red Mountain Creek to property line at the hydrodam near Ouray Ice Park

[bull] Free-flowing: Yes. There is a hydrodam that does not impound water that marks the end of this segment in near the Ouray Ice Park (Ice Box Canyon), however the segment itself is free of diversions and impoundments and is free-flowing.

[bull] ORVs: We agree with the ORVs identified by the District Review team, including Recreation, Scenery, and Geology. We expand on the Recreation ORV below.

o Recreation. From Red Mountain Creek to the Ouray Ice Park, the Uncompahgre Gorge offers challenging Class IV-V whitewater in an incredibly scenic gorge. This is the most challenging section of the Uncompahgre River, as well as the most remote. The canyon walls within the Uncompahgre Gorge are among the narrowest in Colorado.

[bull] Additional Comments:

o The Draft Wild and Scenic River Eligibility Evaluation cites incorrect reasoning for ineligibility on this segment. The [ldquo]WSR Review Notes[rdquo] indicate that more information is needed regarding land ownership, water quality, highway impacts, etc. However, these factors are outside the scope of Eligibility and should not be considered at this time.

o The District Review team identified ORVs of recreation, scenery, geology, and heritage and advocated for eligibility determination on multiple occasions. These valid insights from the local District Review team and from public comments should inform the eligibility determination.

[bull] Classification: Scenic. The Uncompahgre Gorge is set back from the road system as it flows through the gorge, although it is paralleled by Highway 550 and the end of the segment runs through the Town of Ouray and the Ouray Ice Park. Between the put-in and the Ouray Ice Park there are no road or trail intersections and the river is free of impoundments within the segment identified.

[bull] Additional Resources:

- o AW River Inventory Page/Photo Gallery: Uncompahgre Gorge

40 Banks and Eckardt, Colorado Rivers, 124-125

#### 5. Uncompahgre River (Ouray to KOA Campground)

[bull] Recommendation: The Uncompahgre River should be found eligible, Recreation ORV, Recreational Classification

[bull] Tributary of: Gunnison River

[bull] Town of Ouray to KOA Campground: 2.2 miles

[bull] Free-flowing: Yes. This segment of the Uncompahgre is free-flowing in its entirety.

[bull] ORVs:

- o Recreation. From Ouray to the KOA Campground downstream of town, the Uncompahgre provides a popular and challenging class IV-V paddling stretch known to the locals as the Quality Quickie. This segment has been in the guide books since 1995<sup>41</sup> and continues to grow in popularity; Whitewater of the Southern Rockies<sup>42</sup> gives it a 4-star rating.

[bull] Classification: Recreation. Although it is set back from the road, this segment is paralleled by Highway 550 and accessible at multiple points. This stretch is free of impoundments and diversions.

[bull] Additional Resources:

- o AW River Inventory Page: Ouray to KOA CG
- o Media: <https://vimeo.com/99315827>



41 Banks and Eckardt, Colorado Rivers, 139.

42 Stafford and McCutchen, Whitewater, 538.

## Appendix B

### Wild and Scenic River Eligibility Recommendations for the Gunnison National Forest

#### 1. Anthracite Creek and Ruby Fork Tributary (Dark Canyon)<sup>43</sup>

[bull] Recommendation: Anthracite Creek and the Ruby Fork Tributary should be found eligible, Recreation ORV, Wild Classification

[bull] Tributary of: North Fork of the Gunnison

[bull] Ruby Fork TH 836 to Anthracite Creek

[bull] Anthracite-Ruby Confluence to Erikson Springs Campground

[bull] Free-flowing: Yes. Ruby Fork is free of impoundments and man-made structures within this segment. Anthracite Creek is also free of impoundments and diversions.

[bull] ORVs:

o Recreation. Ruby Fork and the mainstem of Anthracite Creek offer a very unique, mandatory hike-in paddling experience. Paddlers hike their crafts (e.g., kayaks, packrafts, canoes) three miles along the Dark Canyon Trail to Ruby Fork of Anthracite Creek. Depending on the flows, the creek provides continuous class IV-V whitewater and gradually gets easier after the confluence with the mainstem of Anthracite Creek. Advanced paddlers from around the state travel to experience the awe-inspiring views and rapids of Ruby-Anthracite. This segment has the longest required hike in, making it both unique and attractive to adventurous paddlers. After the creek flows have dropped, fishermen hike out into the Dark Canyon for incredible fly fishing opportunities. Ruby Fork and Anthracite Creek have been recognized in paddling guide books since 1995 and described as wilderness in character with incredible scenery.<sup>44</sup>

o Scenery. Both the Ruby Fork and the mainstem of Anthracite Creek offer jaw-dropping views of Marcellina Mountain that are unique to the river corridor. As the hiking trail connects with Ruby Fork, you are surrounded by lupine, bluebells, and towering Aspens. Once on the water, Marcellina is viewed on the left and

sheer cliff walls close you in on the right. At the confluence with the mainstem of Anthracite Creek, the views only get more impressive as the creek abuts against the dark, towering walls of Marcellina. The Dark Canyon has been described as

43 Photo retrieved from <https://lacemine29.blogspot.com/2017/07/open-mind-summit.html>

44 Banks, G. and Eckardt, D. Colorado Rivers and Creeks. Hong Kong, (Dave Eckardt and Gordon Banks, 1995), 145.

[ldquo]featuring cliff walls and towering vistas that rise hundreds of feet from river level.[rdquo]45

[bull] Additional Comments:

o On the Ruby Fork, the Draft Wild and Scenic River Eligibility Evaluation states that no ORVs were identified. We disagree with this finding and have identified unique paddling and fishing opportunities on this segment that meet the threshold of a Recreation ORV, as well as unique, river-dependent scenic views within the river corridor.

o On the mainstem of Anthracite Creek, the District Review team identified ORVs of kayaking, fishing, scenery, and geology. American Whitewater agrees with the District Review team[rsquo]s opinion. The paddling opportunities on the Ruby Fork and mainstem of Anthracite Creek are incredibly unique, hike-in access only, challenging, and adventure-seekers from around the state travel to experience these rivers.

[bull] Classification: Wild. Ruby Fork and the mainsteam of Anthracite Creek are free of impoundments and diversions. It is only accessed via a three-mile hike on the Dark Canyon Trail (TH 836) and there are no established roads in the vicinity. There is a low- impact foot trail that follows the river from the Ruby confluence to the takeout.

[bull] Additional Resources:

o AW River Inventory Page:

o Media:

? <https://vimeo.com/224276599>

? <https://www.youtube.com/watch?v=mEfp1NtMqtg>

2. Upper Taylor River

[bull] Recommendation: The Upper Taylor River should be found eligible, Recreation & Scenery ORVs, Recreation Classification

[bull] Tributary of: Gunnison River

[bull] Headwaters to FS Boundary near Illinois Creek

[bull] Free-flowing: Yes. From the headwaters to the FS Boundary, the Upper Taylor River is free of impoundments.

[bull] ORVs:

o Recreation. A high mountain gem - the Upper Taylor River offers unique paddling and fishing opportunities. The river is incredibly scenic, with continuous beginner- intermediate whitewater. The GMUG does not offer many beginner-intermediate paddling runs, making this stretch a unique attraction for rafters, family floating trips, and kayakers alike. In addition, this stretch is very popular for fly fishing opportunities.

o Scenery. The Upper Taylor is in an alpine meadow setting with incredible views of the surrounding peaks. This view is much unlike other river corridors in the region, which are commonly in canyons and densely forested.

45 Stafford, E. and McCutchen, K. Whitewater of the Southern Rockies. (Wolverine Publishing, Silt (CO), 2007), 128.

[bull] Classification: Recreational. The Upper Taylor River is free of impoundments and man- made structures, however the river is paralleled by an unpaved road (NF-742) and should be classified as recreational.

[bull] Additional Resources:

o AW River Inventory Page: Upper Taylor River

o Media:

? Yeti Gone Crazy Blog

### 3. Lower Taylor River (Taylor River Canyon)

[bull] Recommendation: The Lower Taylor River should be found eligible, Recreation ORV, Recreational Classification

[bull] Tributary of: Gunnison River

[bull] Lottis Creek to FS Boundary near Almont

[bull] Free-flowing: Yes. This segment is downstream of the Taylor Park Reservoir, however the segment itself is free-flowing in character with minimal man-made structures and diversions. The Reservoir User Group manages the reservoir to best mimic natural flows for fisheries. The Forest Service Handbook (Ch. 82.71) makes it clear that a river segment may still be considered free-flowing if it flows between large impoundments and/or if small impoundments exist within the reach.

[bull] ORVs:

o Recreation. The Taylor River Canyon between Lottis Creek and the FS Boundary near Almont offers Class II - IV paddling opportunities in a scenic canyon setting. This stretch brings the local paddling community together for a well-loved [ldquo]Taylor Tuesday[rdquo] tradition and attracts paddlers from across the state. The Taylor Canyon boasts one of the longest paddling seasons in the Upper Gunnison Valley and its boulder-garden character sets it apart from other rivers in the area. In addition, the Taylor River is host to an annual Kayak and Raft Race as part of the Gunnison River Festival. This special river canyon brings together extreme kayakers, rafters, and beginners, providing an experience for all types of paddlers.

[bull] Classification: Recreational. Although often not visible from the river, this stretch is paralleled by CR 742 and the river is accessed in multiple places by the road.

[bull] Additional Resources:

o AW River Inventory Page: Lower Taylor River

o Media:

? Southwest Paddler Page

? 2019 Taylor River Race

#### 4. Slate River (Headwaters to Poverty Gulch)

[bull] Recommendation: From the headwaters to Poverty Gulch, the Slate River should be found eligible, Recreation & Scenery ORV, Scenic Classification

[bull] Tributary of: East River

[bull] Headwaters to confluence with Poverty Gulch (i.e., Daisy Creek)

[bull] Free-flowing: Yes. This segment of the Slate River is free-flowing in its entirety. There are no diversions or man-made structures and the banks are largely undeveloped, except for the Slate River Road which parallels the river in places.



[bull] ORVs:

o Recreation. This segment of the Slate River (known as the North Fork Slate to most paddlers) provides the most challenging creek boating experience in the Gunnison Valley. It is famous for its gigantic falls, the North Fork Slate Falls, and extremely tight chutes.<sup>46</sup> Guide books have given it a 4-star rating and it provides a unique challenge for the bravest of paddlers.<sup>47</sup> The Class V+ paddling section starts approximately one mile upstream from the confluence with Poverty Gulch.

o Scenery. The headwaters of the Slate River are nestled between Treasury and Purple Mountain, offering awe-inspiring views of the Ruby Range. Downstream of the headwaters, the extreme waterfalls provide scenic views and photo opportunities.

[bull] Additional comments:

o The 2005 Comprehensive Evaluation Assessment determined this stretch to be eligible with a scenery ORV for the canyon terrain and waterfalls. The scenery conditions have not negatively changed since 2005, indicating that the scenery ORV determined in 2005 should be carried forward in the current Draft Wild and Scenic Eligibility Evaluation. Since 2005, the creek boating on this stretch has become more well-known and its uniqueness recognized in regional guide books, thus necessitating the addition of a Recreation ORV.<sup>48</sup> If anything, the ORVs on this segment have become more prominent since 2005.

[bull] Classification: Scenic. The Slate River is paralleled in some places by an unpaved road and hiking trails, however the banks are largely undeveloped and the river is void of man-made structures.

[bull] Additional Resources:

o AW River Inventory Pages/Photo Gallery: North Fork Slate River

o Media:

? [https://www.youtube.com/watch?v=n3Vq\\_A2kkvU](https://www.youtube.com/watch?v=n3Vq_A2kkvU)

? <https://vimeo.com/183392076>

? Yeti Gone Crazy Blog - North Fork Slate

5. Slate River (Poverty Gulch to Oh-Be-Joyful)

[bull] Recommendation: The Slate River should be found eligible, Recreation ORV, Scenic Classification

[bull] Tributary of: East River

[bull] Poverty Gulch to Oh-Be-Joyful

46 <http://yetigonecrazy.weebly.com/north-fork-slate.html>

47 Stafford and McCutchen, *Whitewater*, 134

48 *Ibid.* 134

[bull] Free-flowing: Yes. There are no man-made structures in the river, although small well- rights and small conditional water rights exist on the Slate River. Currently, this river segment meets the qualifications for free-flowing.

[bull] ORVs:

o Recreation. This stretch of the Slate River has been recognized in multiple guidebooks for the region.<sup>49</sup>  
50 It provides a different experience than other creeks in the valley; its gradient is less significant than other creeks in this area and the hydraulics are fierce. Still a challenging Class V kayaking run, this segment has a longer paddling season than its neighbors.

[bull] Classification: Scenic. The Slate River is paralleled in places by an unpaved road (CR 734), hiking trails, and is accessible at certain points. The river drops away in many places as it flows through the Slate River canyon. There are no man-made structures in the river, although small well-rights and small conditional water rights exist on the Slate River.

[bull] Additional Resources:

o AW River Inventory Pages/Photo Gallery: Upper Slate River

o Media:

? [https://www.youtube.com/watch?v=n3Vq\\_A2kkvU](https://www.youtube.com/watch?v=n3Vq_A2kkvU)

? <https://vimeo.com/183392076>

? Yeti Gone Crazy Blog - North Fork Slate

## 6. Slate River (Oh-Be-Joyful to Town of Crested Butte)

[bull] Recommendation: The Slate River should be found eligible, Recreation, Botanical, & Wildlife ORVs, Scenic Classification

[bull] Tributary of: East River

[bull] Oh-Be-Joyful to Town of Crested Butte

[bull] Free-flowing: Yes. There are a couple insignificant diversions upstream of the Coal Creek confluence and the Mount Emmons Mining Company has a small conditional water right near the Oh-Be-Joyful confluence, however none of these diversions impact the natural flow regime of the river and currently the segment meets the qualifications for free-flowing.

[bull] ORVs:

o Recreation. In the past few years this segment of the Slate River has become incredibly popular for Stand Up Paddleboarding (SUPing), a relatively new sport. It has been recognized as some of the best SUPing in the state for its mellow floating experience, grandeur views of the Slate River Valley, and surrounding natural environment. This segment also offers a rare beginner opportunity for kayakers. In the Upper Gunnison Valley, there are no other flatwater boating opportunities where people can learn to kayak in a safe environment.

o Botanical. Please refer to High Country Conservation Advocates's comments on this segment for in depth details on the Botanical ORV of this segment.

49 Stafford and McCutchen, Whitewater, 132

50 Banks and Eckardt, Colorado Rivers, 164

o Wildlife. Please refer to High Country Conservation Advocates's comments on this segment for in depth details on the Wildlife ORV for the high-altitude heron habitat.

[bull] Additional Comments: Although part of this segment extends outside of the Forest Service Boundary, we believe that its many ORVs warrant its inclusion as an eligible river segment. According to the Forest Service Handbook, a river segment may extend beyond the Forest Service Boundary in certain circumstances. 51 In this case, there are ORVs that extend downstream of the Forest Service Boundary on the Slate River that depend on protections under the Wild and Scenic Rivers Act. Additionally, the river maintains its incredibly scenic environment and remoteness until it reaches the Town of Crested Butte.

[bull] Classification: Scenic. The majority of this segment is significantly distanced from CR 734 and is only paralleled by a non-motorized trail in some places. Although the segment has a couple of minimal diversions and cattle fencing, it is largely void of man-made structures and the banks are undeveloped.

[bull] Additional Resources:

o AW River Inventory Pages/Photo Gallery: Middle Slate River

o Media:

? [https://www.youtube.com/watch?v=n3Vq\\_A2kkvU](https://www.youtube.com/watch?v=n3Vq_A2kkvU)

7. Daisy Creek (i.e., Poverty Gulch)

[bull] Recommendation: Daisy Creek should be found eligible, Recreation & Scenery ORV, Scenic Classification

[bull] Tributary of: Slate River

[bull] Headwaters to Slate River Confluence

[bull] Free-flowing: Yes. Daisy Creek is free-flowing in its entirety; it is free of impoundments, man-made structures, and diversions.

[bull] ORVs:

o Recreation. Daisy Creek flows from its headwaters in Daisy Pass through Poverty Gulch and into the Slate River. Advanced paddlers put in below the first significant falls (40[rsquo] tall) and quickly find themselves in fast moving water that drops over a series of short slides and drops. The thrill of the whitewater heightens as Big Woody Falls (22[rsquo] tall) approaches. While still technical, Big Woody Falls offers a unique waterfall experience, without the commitment required of Oh-Be-Joyful.

o Scenery. Daisy Creek meanders through the high alpine fields below Daisy Pass before it drops away from the meadows and into a committing, forested canyon. The character of the canyon is remote and the latter part of the run offers incredible views of the Slate River Valley.

[bull] Classification: Scenic. The majority of Daisy Creek is set back from any roads or trails and requires a steep hike down into the canyon at the base of the 40[rsquo] waterfall. At certain points the river is accessed by a 4x4 road (Poverty Gulch Rd) and towards the end of the stretch there exists a bridge over the creek.

51 Forest Service Handbook, 1909.12 Ch. 82.61

[bull] Additional Resources:

o AW River Inventory Page: Daisy Creek

o Media:

? <https://vimeo.com/134668326>

8. East River

[bull] Recommendation: The East River should be found eligible, Recreation ORV, Scenic Classification

[bull] Tributary of: Gunnison River

[bull] Gothic Road Bridge to East River Meanders

[bull] Free-flowing: Yes. The East River is free of impoundments and man-made structures

[bull] ORVs:

o Recreation. The primary section of the [ldquo]Upper East[rdquo] is the easiest of the four high- quality creeks in Crested Butte, but the end of this stretch includes [ldquo]Stupid Falls,[rdquo] a spectacular waterfall that is one of the tallest in the state. At moderate flows, the upper stretch provides a unique opportunity for intermediate paddlers to test their skills on slides and moderately sized falls.<sup>52</sup> This segment is set in the Gothic Valley, the wildflower capital of Colorado and provides scenic views of the East River corridor.

[bull] Classification: Scenic. Immediately after the put-in bridge, the river drops away from the road into a narrow canyon and there is a mandatory hike-out to a dirt road at the end of the segment. The river banks are largely undeveloped and there are no impoundments or man-made structures in the river.

[bull] Additional Comments: In addition to this segment of the East River, we support eligibility on the entire segment from the headwaters at Emerald Lake to the Forest Service Boundary for additional ORVs of scientific research, scenery, ecological, and geological (see High Country Conservation Advocates[rsquo] comments).

[bull] Additional Resources:

o AW River Inventory Page/Photo Gallery: Upper East

o Media:

? <https://vimeo.com/129999464>

? <https://www.youtube.com/watch?v=F5r97FRPTvc>

## 9. Oh-Be-Joyful Creek (1B)<sup>53</sup>

[bull] Recommendation: Oh-Be-Joyful Creek (1B) should be found eligible, Recreation ORV, Scenic Classification

[bull] Tributary of: Slate River

[bull] Length: 1.66 miles

[bull] Free-flowing: Yes.

<sup>52</sup> Stafford and McCutchen, Whitewater, 136

<sup>53</sup> Photo credited to Matt Berglund Photography

[bull] Classification: Scenic. Classification should be changed from Recreational to Scenic. Segment 1B is free of impoundments and manmade structures. This segment is paralleled by a hiking trail and a dirt road, but motorized access has been prohibited here.

[bull] ORVs:

o Recreation. We concur with the recreation ORV for kayaking. Oh-Be-Joyful (OBJ) provides a unique kayaking experience on the Western Slope and attracts visitors from across the state and the nation. Since 1995, OBJ has hosted an annual kayak competition [ndash] the steepest kayak race in the country. In addition to a series of 12[rsquo] to 25[rsquo] waterfalls, OBJ has numerous challenging slides (see photo). OBJ has been recognized in numerous guidebooks for being visually spectacular,<sup>54</sup> having exceptionally clean lines,<sup>55</sup> a 5-star rating,<sup>56</sup> and as [ldquo]king of the Colorado steeps.[rdquo]<sup>57</sup>

[bull] Additional Resources:

o AW River Inventory Page/Photo Gallery: Oh-Be-Joyful

o Media:

? Kayak Session Video; Race History; 2019 Race Event; Yeti Gone Crazy Blog