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Comments: General Comments

Thank you for the opportunity to comment on the GMUG Draft Forest Plan. We appreciate that the GMUG staff have been working hard to consider comments from a wide variety of forest users. The Colorado Mountain Club (CMC) primarily represents human-powered recreation users including hikers, climbers and backcountry skiers. CMC has played an active role in the Outdoor Alliance recreation stakeholder group and helped to craft the Outdoor Alliance (OA) GMUG Vision document as well as OA comments on the Draft Plan. Winter Wildlands Alliance (CWC) is a national nonprofit organization dedicated to promoting and preserving winter wildlands and a quality human-powered snowsports experience on public lands through education, outreach and advocacy. WWA is a member of Outdoor Alliance and has several grassroots advocacy partners on Colorado's West Slope.

Our comments here are more closely focused on the recreation opportunity spectrum because [ndash] in the absence of designated areas to protect recreation and conservation priorities [ndash] the ROS is

the next best tool to set a strong framework for future recreation management on the forest. Overall, the forest needs to strengthen plan components and ensure the ROS framework is sufficiently strong to provide clear direction for future winter travel management planning and other recreation management decisions. Furthermore, the forest should commit to starting Subpart C travel management planning within one year of signing the Record of Decision on a final Forest Plan.

We wanted to call out a few high-level observations which are expanded upon in our comments:

[bull] There is hardly any land recommended for wilderness in the Draft Plan (only 34,000 acres across the entire forest in Alt B).

[bull] The plan contains much-needed standards for dispersed camping and for responsive management actions in day-use areas. This is a positive step towards better management of recreation impacts and we are hopeful that sites damaged by heavy dispersed use may be rehabilitated

[bull] Alternative D provides the most acreage for conservation and human-powered recreation on the Forest, though there are some proposed restrictions that simply do not make sense and have only served to polarize the motorized recreation community against this entire alternative.

[bull] The decrease in primitive and semi-primitive non-motorized summer recreation settings in Alternative B reduces opportunities for quiet backcountry recreation.

[bull] We are concerned that the forest continually asserts that Winter Travel Planning has been completed on the majority of the GMUG without having ensured that previous decisions meet the minimization criteria as required in Subpart C of the Travel Management Rule (36 C.F.R. part 212). Until the minimization criteria has been fully applied in the designation of areas and trails open to OSV use in accordance with Subpart C, all open areas in previous travel plans should be displayed as Not Yet Analyzed.

Recreation Objectives

[bull] FW-OBJ-REC-06: Does the plan state how many total unauthorized motorized travel routes existing in

semi-primitive non-motorized areas? Eliminating only two seems very low for the entire forest. Recommend replacing [ldquo]at least two[rdquo] with [ldquo]all[rdquo] or with an achievable percentage of all unauthorized routes.

[bull] FW-OBJ-REC-07

o Biophysical Impacts: Appreciate the reference to campsite impact rating using the National Minimum Recreation Site Monitoring Protocol. Consider adding similar density settings to ROS classifications.

o Social Impacts: Add [ldquo]Parking Issues[rdquo] to list of other indicators of social impact

[bull] Add a new Objective that reads: [ldquo]Winter Travel Management planning will be initiated within ONE year of publication of the Forest Plan[rdquo]

[bull] Forest plans should include a standard that all area and trail designations made through implementation-level travel planning will be located to minimize resource impacts and conflicts with other recreational uses, in compliance with Executive Orders 11644 and 11989 and 36 C.F.R. [sect] 212.55(b)

#### Recreation Opportunity Spectrum

We appreciate the adjustment to the ROS classifications table to reflect different characteristics for Summer and Winter recreation (Tables 10-15, Draft Plan p 65-70). However, the new "size" and "remoteness" classifications in the Recreation Opportunity Spectrum are overly restrictive and prevent landscapes with primitive or semi-primitive non-motorized character from inclusion in the setting. This is especially important in winter when skiers should be able to access non-motorized areas adjacent to roads and trailheads. And in fact, a number of polygons proposed in the ROS maps do not meet the minimum size requirements or remoteness criteria. We recommend removing these requirements from the ROS settings.

In relation to the winter ROS characteristics, the availability of warming huts, cabins and rustic facilities should be included in both Semi-Primitive settings (Table 12 & 13) to facilitate overnight backcountry travel, particularly in winter. The San Juan Huts and other facilities are located within areas currently proposed for semi-primitive ROS classification and provide an important recreation and economic opportunity for local communities.

We recommend the following changes to the ROS settings:

[bull] Table 10 (Pristine ROS).

o Winter Characteristics list access only [ldquo][hellip]via cross-country travel on foot and horse[rdquo] [ndash] this may be confusing as ski/snowshoe access is allowed. Should be: [ldquo]non-motorized cross-country travel.[rdquo]

[bull] Table 11 (Primitive ROS)

o The social encounters setting is ambitious and will likely require permitting/limiting use in popular Wilderness areas. While we are not opposed to this desired condition, the forest will need to dedicate added capacity to reach this goal.

[bull] Table 12 (Semi-primitive non-motorized)

o Remoteness: Semi-primitive areas may exist in close proximity to roads and should not require a [frac12] mile buffer. Non-motorized users should be able to utilize roads for access and immediately enter an adjacent non-

motorized area. We recommend removing the remoteness prescription.

o Winter Characteristics limit facility availability. The setting should allow for the existence of primitive backcountry huts and yurts so that non-motorized users can enjoy quiet, multi-day trips into more remote areas of the forest. Add [ldquo]Warming huts, cabins and rustic facilities may be present.[rdquo]

[bull] Table 13 (Semi-primitive motorized)

o Remoteness: Semi-primitive areas may exist in close proximity to roads and should not require a [frac12] mile buffer. Users should be able to utilize roads for access and immediately enter an adjacent semi-primitive area, especially in winter. We recommend removing the remoteness prescription.

o Winter Access: strengthen language to include the additional underlined words [ldquo]Over-snow vehicle use only allowed on designated routes and in designated open areas.[rdquo]

o Winter Characteristics limit facility availability. The setting should allow for the existence of backcountry huts and yurts so that users can enjoy multi-day trips

into more remote areas of the forest. Add [ldquo]Warming huts, cabins and rustic facilities may be present.[rdquo]

[bull] Table 14 (Roaded Natural)

o Winter Access: missing language on OSV use, please add [ldquo]Over-snow vehicle use only allowed on designated routes and in designated open areas.[rdquo]

[bull] Table 15 (Rural)

o Winter Access: strengthen language to include the additional underlined words [ldquo]Over-snow vehicle use only allowed on designated routes and in designated open areas.[rdquo]

#### Winter ROS Maps

We are concerned that the forest continually asserts that Winter Travel Planning has been completed on the majority of the GMUG without having ensured that previous decisions meet the minimization criteria as required in Subpart C of the Travel Management Rule (36 C.F.R. part 212). The forest has also failed to produce any OSVUM maps since the planning rule was revised in 2015 and, until the recent publication of the Story Map, this data was never available to the public in GIS form. Winter Travel Planning on the Uncompahgre and Grand Mesa simply list a few areas that are closed to OSV use without fully analyzing the remainder of the forest deemed [ldquo]open to OSV[rdquo] or [ldquo]no restrictions.[rdquo] This [ldquo]open unless closed[rdquo] framework is in direct conflict with the revised Travel Management Rule. The Winter Travel Map is therefore highly misleading and sets an erroneous precedent for the forest planning process and development of winter ROS maps. Until the minimization criteria has been fully applied in accordance with Subpart C, all open areas in previous travel plans should be displayed as Not Yet Analyzed.

Though not part of the official Draft Plan, the [ldquo]Forest Plan Revision Recreation Opportunity Settings FAQs[rdquo] that was distributed to the public is heavily biased towards the motorized community and repeatedly encourages the application of motorized settings.

- We ask that you be forward thinking and strategic - for example, where is it important to you to maintain or expand the future opportunity to build a new trail, or to maintain or expand OSV access?

- What kinds of comments are most useful? If you see something on the maps that doesn't make sense, for example because of something mapped as nonmotorized where there are existing motorized uses or trails, let us know [ndash] we want to get them right.

This document was discouraging to the non-motorized community and did not provide balanced recommendations for how to comment from a non-motorized perspective.

#### Red Mountain Pass

We appreciate the Semi-Primitive Non-Motorized setting for the majority of land on the West side of Red Mountain Pass in Alternatives B & D as this is a high priority backcountry skiing area. However, the boundaries of the Roaded Natural setting along Highway 550 near the top of the pass seem somewhat random and appear to vary in distance from the road. We recommend using well-defined topographic boundaries like ridgelines, cliffs, streams, etc. to delineate boundaries between motorized and non-motorized areas.

#### Sneffels

The northern foothills of the Sneffels Range should be classified as Semi-Primitive Non-Motorized as proposed in Alternative D. The area north of the Wilderness boundary is a high-priority winter recreation area for non-motorized users including backcountry skiers, Nordic skiers, snowshoers and backcountry hut users. Outdoor Alliance recommended this zone as a Backcountry Management Area. Alternative B includes a large non-motorized area encompassing the East and West Whitehouse Mountain Wilderness additions but proposes an adjacent patchwork of semi-primitive motorized areas which will be confusing for users and difficult to manage. We recommend expanding the semi-primitive non-motorized setting to include the entire area along the foothills of the Sneffels range.

#### Cimarrons

Alternative B proposes a semi-primitive motorized winter recreation setting for Cow Creek, West Fork and Middle Fork of the Cimarron River which all cherry-stem into the Uncompahgre Wilderness. Managing the Wilderness boundary in winter is especially challenging and results in motorized incursions into primitive areas. We recommend a semi-primitive non-motorized setting for all of these drainages to protect the adjacent Wilderness character. Middle Fork, in particular, is also proposed as a Wildlife Management Area in Alternative B and should be classified as non-motorized to protect sensitive habitats. The Roaded Natural setting in around the East Fork drainage also seems extensive, especially adjacent to Wilderness boundary.

#### Alpine Plateau

The boundary on the east side of the plateau between semi-primitive non-motorized and semi-primitive motorized seems arbitrary. We recommend using well-defined topographic boundaries like ridgelines, cliffs, streams, etc. to delineate boundaries between motorized and non-motorized areas. Additionally, the Roaded Natural setting proposed in Alternative B seems extensive in this area, especially adjacent to the Wilderness boundary, and we recommend expanding the semi-primitive area.

#### Lizard Head Pass

In Alternative B, a 364-acre semi-primitive non-motorized polygon at Hidden Lake cherry-stems into non-motorized area and will be difficult to manage. We recommend applying a semi-primitive non-motorized setting to this entire area.

## Crested Butte [ndash] Winter Data Collection Initiative

The GMUG should include recreation data from the Winter Data Collection Initiative (Winter DCI) in the DEIS to help inform planning decisions related to winter recreation. This study is an ongoing, multi-year study conducted by graduate students in the Master[rsquo]s in Environmental Management (MEM) program at Western Colorado University (WCU). Students have collected and analyzed infrared sensor data for five consecutive winters to date (Lieberman, 2017; Shaw, 2018, Cox et al., 2019, Armstrong, 2020, Stach, 2021). The data are unbiased and collected and analyzed independently. The program has been funded by grants from the Town of Crested Butte, Community Foundation of the Gunnison Valley, matching donations from Silent Tracks and other donors, and in-kind donations from WCU.

Over 44,000 recreation visits were recorded by infrared motion detectors at the six winter trailheads around Crested Butte last winter (Stach, 2021). This was nearly double the number of visits recorded in the prior two years. More than 116,000 winter visits have been documented to date. Over 70 percent of the winter visits in the Crested Butte area were non-motorized (human-powered). Excluding the predominantly motorized winter trailhead at Kebler Pass, over 90 percent of the visits at the remaining trailheads in the Crested Butte area were non-motorized. Links to the full reports can be found online at <https://silenttracks.org/dci/>

A Revised Plan that is proactive and addresses trends such as increased and expanded usage, parking lot issues, trail crowding and use conflict, population growth in Colorado and specifically in the Crested Butte area is essential to manage both current and future desired conditions.

## Crested Butte [ndash] Slate River Road

Slate River Road (CR#734) is a County Road from Gothic Road (CR#317) through the townsite of Pittsburg. Pittsburg is a popular destination for human-powered day tours and many OSV/hybrid users park there to access the Schuykill Ridge and Poverty Gulch area. Most non-motorized users do not go beyond Pittsburg in winter; however, the areas north of Pittsburg are utilized by hybrid skiers especially in the early winter/spring. These slopes are highly valued backcountry ski/board areas within a few miles of the winter trailhead and should be classified as Semi-Primitive Non-Motorized. A Semi-Primitive motorized setting for the road corridor is appropriate to facilitate access.

## Crested Butte [ndash] Washington Gulch

Winter access in the Washington Gulch drainage is on Washington Gulch Road (CR #811, Road ID 7811). This is a popular xc ski and snowshoe destination, in part because of its close location to the towns of Crested Butte/Mt Crested Butte. The road is used by all types of users to access Conneys, Elkton Huts and Top of the World. OSVs are restricted to the road in Lower Washington Gulch (USFS, 2015), which was implemented due to private landowner concerns.

? Coney[rsquo]s is a popular backcountry ski destination, so Semi-Primitive Non-Motorized is an appropriate designation.

? Elkton Huts [ndash] Since the huts are located a few miles from the towns of Crested Butte and Mt. Crested Butte and the winter trailhead, they are a popular destination for xc skiers and snowshoers. The areas around the huts offer exceptional backcountry terrain and are appropriately allocated as Semi-Primitive Non-Motorized.

## Crested Butte [ndash] Brush Creek

Brush Creek Road (CR#738) is a County Road from HW #135 to a location known as Tent City. Brush Creek Road beyond the winter trailhead is used by motorized, non-motorized and hybrid users. There is no alternative

trail for non-motorized users to use. This is the trailhead to the Friends Hut, a popular backcountry hut and tour destination, and part of the course for the Grand Traverse race. We recommend a Semi-Primitive Non-Motorized setting as proposed in Alternative D.

#### Kebler Pass

Red Lady Bowl / Redwell is an extremely popular backcountry ski/board destination that should be designated as Semi-Primitive Non-Motorized.

Green Lake is a popular snowshoeing area from the Town of Crested Butte and should be designated as Semi-Primitive Non-Motorized.

#### Irwin

The area to the north and west of Lake Irwin (known as Robinson Basin and including Ruby Peak, Green Lake, Mount Owen and Scarp Ridge) should be designated as semi-primitive non-motorized to improve public safety and minimize conflict with private property owners. The slopes surrounding the basin are steep and prone to avalanches in winter. Currently there is no legal access route across private property north of the lake without traversing slopes that exceed 35 degrees and risk triggering avalanches onto private property. Several snowmobile deaths have occurred in this area on both public and private property.

Additionally, Lake Irwin is 1.25 miles from the closest boundary of the Raggeds Wilderness and only 2.2 miles from the northernmost point of the lake to the top of the drainage (also the Wilderness Boundary). A non-motorized setting in the basin is necessary to achieve the Primitive ROS setting for the surrounding Wilderness area. A motorized setting from County Road 12, along FSR 826 and around Lake Irwin is appropriate to accommodate current use and the proposed non-motorized area would only limit access to ~2,500 acres, much of which is inaccessible to motorized vehicles because of slope angle.

The forest did not include analysis of a non-motorized setting in any alternative for this area and should include analysis and a decision to support a Semi-Primitive Non-Motorized ROS setting for both winter and summer.

#### Crested Butte [ndash] Cement Creek

The parcel (FID 502, 5575 acres) above the CB South and the Meadows subdivisions should be reclassified as semi-primitive non-motorized, because of wildlife concerns and the lack of public access in the winter. Local residents in the CB South area have reported seeing only a handful of OSVs in the area in more than 25 years of observations. Additionally, the area is home to wintering elk and moose.

Lower Cement Creek - Parcels (FID 778; 7012.6 acres, FID 526; 52,338 acres) should be designated as Semi-Primitive Non-Motorized, as proposed in Alt B to maintain a wildlife migration corridor and because the terrain is unsuitable for motorized use due to steep topography and dense tree cover.

Walrod Gulch is a popular crosscountry ski and snowshoe destination that we recommend designating as should be Semi-Primitive Non-Motorized.

Caves Trail is a popular hiking trail in winter with southern exposures that we recommend designating as Semi-Primitive Non-Motorized.

Middle Cement Creek Trail is a hiking/snowshoe trail in winter and we recommend a Semi-Primitive Non-Motorized setting for this area.

Historic Pioneer Ski Area is a backcountry ski destination with steep slopes and dense trees. We recommend a Semi-Primitive Non-Motorized setting for this area.

The Roaded Natural setting for the Cement Creek road should be narrowed and allow for access to semi-primitive non-motorized areas.

#### Management Approaches

The Management Approaches section of the recreation segment of the plan (beginning on page 70) incorporates a number of good principles but it is unclear how they will be applied and if/how the agency will be held accountable. We would recommend incorporating some of these approaches into specific plan components (standards, objectives and guidelines) to strengthen the forest plan. We also recommend numbering the management approaches for easier reference. We have referred to the bullet points as they are ordered in the draft plan below:

[bull] Bullet Point #3: We appreciate the additional sentence that aims to [ldquo][hellip]better ensure funding and resources for basic maintenance[hellip][rdquo] but recommend that this sentence stand alone as a separate bullet point.

[bull] Bullet Point #10: This entirely undercuts the strength and value of the forest plan with regards to the Recreation Opportunity Spectrum and should be removed. All future planning efforts should tier back to the Forest Plan, not vice versa. Any inconsistency MUST require a plan amendment and the associated NEPA process. We recommend removing this bullet point in its entirety.

[bull] Bullet Point #14: The winter Recreation Opportunity Spectrum must set the stage for winter travel planning in the future and reflect desired future conditions, not just existing use on the ground. The forest plan should include a minimum snow depth for oversnow vehicle use of 18" as a standard of suitability for OSV use, rather than punting this decision to the future. We recommend removing bullet point #14 and including a Standard that reads [ldquo]Designated areas may only open to cross-country OSV use when snow depth measurements at established, representative locations reach at least 18 inches.[rdquo]

#### EBikes

Because of the recent misinterpretations around Electronic Bicycle classification and push for use on non-motorized trails, we strongly recommend that the forest service include language about E-Bike suitability in the forest plan. Simply, E-Bikes are a motorized form of transportation and should be managed in accordance with the Travel Management Plan as a motorized vehicle. Non-motorized routes may, in some cases, be re-classified to allow E-Bikes but this designation MUST happen through a public travel planning NEPA process. We recommend that any language in the forest plan that refers to restrictions or suitability for motorized travel also include the addition of e-bikes, for example in the semi-primitive non-motorized ROS: [ldquo]These settings are free of motorized recreation transport, including electronic bicycles...[rdquo]

#### Conclusion

Thank you for considering our comments on the GMUG Draft Forest Plan. If you have any questions or would like to meet to discuss our recommendations, please do not hesitate to reach out.