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Title:

Comments: To the GMUG National Forest,

Please accept these comments to the Draft Forest Revision. You will find them here:

https://docs.google.com/document/d/1kmFuSSYdrVSbZLlxPwTvEJL8MilgEB_RjwwBGI4sfn4/edit?usp=sharing

and also the attached PDF.

Brittany Konsella

President, Share the Slate

I am writing on behalf of Share the Slate. A 501 (c)3 organization formed in 2016, our mission is to protect winter access to public land and promote the shared interests of all user groups within the public lands of Gunnison County and beyond. Our objective is to maintain winter motorized access to our public lands and promote shared use areas that all winter recreationists can enjoy. We believe that, through education and awareness, all users can continue to happily coexist on our winter trails without restricting access to specific user groups on our public lands. While our organization feels that we represent multiple user groups, we primarily represent "hybrid users", which are recreationists who use over-snow vehicles to access backcountry skiing.

The intent of this letter is to address our concerns about the upcoming GMUG Draft Forest Plan. Before we describe our detailed concerns, Share the Slate would like to remind the Forest Service that closing vast swaths of public lands to one specific user group (over-snow vehicles) has many unintended negative consequences. For one, motorized users will be packed into dense areas where snowmobiling is still allowed. This will create dangerous conditions for collisions between riders. This will also create hardships for other user groups- rather than the occasional motorized user passing by, the few areas open to snowmobiling will be too busy for other groups to enjoy. We advocate that the GMUG adopt a multi-use approach which allows users to spread out. This approach will greatly reduce potential user conflict. Currently, much of the GMUG National Forest does implement a multi-user approach. Many of the suggestions built into Plans B & D would limit the uses of many recreationists in winter. We encourage the GMUG to limit concepts from these two plans into the final Forest Plan.

Specific Areas of Concern

Given that our organization is based in Gunnison County, our specific areas of concern are located within the Gunnison National Forest. This does not mean that we condone closure of public lands to specific winter user groups in the Grand Mesa or Uncompahgre National Forests. But, our use and therefore awareness of these areas in winter is limited and we do not feel we have the knowledge to address details. Our specific concerns

regarding potentially closed areas of the Gunnison National Forest are listed below:

1) Poverty Gulch

Poverty Gulch located up the Slate River drainage NW of Crested Butte is a favorite hybrid use area. Many hybrid users can access the Baxter Gulch area via snowmobile when snow conditions allow. The northeast slopes of the subpeak 11,861 of Schuykill Mountain allow a unique opportunity for "sled laps" below the bench at 10,600', where hybrid users can ride a snowmobile to the top of the route that they intend to ski or snowboard down. The northern boundary of the primitive designation proposed in Plan D will eliminate OSV access to this special zone. Furthermore, a creek that defines the western boundary of the northern edge of the proposed Poverty Gulch Wilderness is difficult to define with snow cover. Additionally, while the proposed boundary allows snowmobiles to stay on the road north of the actual Poverty Gulch, this area is prone to avalanche activity. Many prefer to sled along the southern (north-facing) edges of the gulch. Essentially, the proposed primitive boundary closes a safe access point and forces people to use an avalanche prone slope. For all of these reasons, Share the Slate suggests moving the northern edge of the Poverty Gulch Wilderness to the northeast ridge shown in the image below:

[(PHOTO) EXCERPTED: Google Earth Image Poverty Gulch]

If the Poverty Gulch Wilderness boundary cannot be moved, Share the Slate would like to see the southern border of the Poverty Gulch SMA moved to meet the Poverty Gulch Wilderness boundary, essentially following the 9600' contour line. Snowmobiling on the road can often be dangerous, putting recreationists who cross this warm south facing slope in unnecessary avalanche danger.. For safety reasons, many hybrid users tend to travel into Baxter Basin closer to the valley floor, south of the stream. Moving the southern edge of the SMA boundary to the 9600' contour, or further south, would ensure that safe motorized access is maintained to the Baxter Gulch area.

Our concern with this boundary only appears in Plan D. The boundary in Plans B and C remain the same as the current use Plan A. We realize that this primitive boundary is based on the GPLI proposal, and the intended Poverty Gulch Wilderness area. We would like to make it clear that we were not included in the GPLI discussions as a user group. While we did make comments about this specific boundary to them, the location of this boundary remains unchanged in the GPLI Proposal.

2) Plan A Designation of Brush Creek

We have found what we believe to be a discrepancy or misrepresentation of current use on Plan A in the Brush Creek zone. The image below shows the Brush Creek area including West, Middle, and East Brush Creek, as under a semi-primitive non-motorized designation.

[(Photo) EXCERPTED: Brush Creek Area Image]

Many people currently travel up the main Brush Creek to West Brush Creek drainages with the understanding that the road is open to OSV use. A pamphlet titled Winter Recreation around Crested Butte, published by the Forest Service, shows that this road is open to winter motorized use. Included below are screenshots from the pamphlet.

[(Photo) EXCERPTED: Image of Winter Recreation Guide, Brush Creek Road]

The current Plan A needs to make it clear that the West Brush Creek Road is open to OSV use. This clarification must filter into Plans B, C, and D as well.

Share the Slate would like to ensure that OSV access to the West Brush Creek Drainage is maintained. This provides valuable backcountry skiing opportunities around Teocalli Mountain that would otherwise be extremely difficult for skiers to access.

3) Pearl Pass Area

Share the Slate would like to obtain winter motorized access to Pearl Pass because of the unique skiing opportunities in the area. While avalanche and snow conditions allow access to this area for usually only a few weeks each year, the unique backcountry skiing opportunities available during that time are unmatched. The current use Plan A shows that motorized access is closed on Pearl Pass Road and the Brush Creek Drainage. Therefore, we will have no alternative but to drive over 4 hours to Ashcroft in the spring to access the skiing opportunities that could otherwise be easily accessed from Crested Butte should OSV use be allowed on Pearl Pass Road. This is a motorized area in summer and we would like to maintain access to the other side of the Elk Mountains via this traditionally motorized path. We encourage the GMUG National Forest to open this corridor to OSV use.

4) East Brush Creek

According to the pamphlet mentioned above titled Winter Recreation around Crested Butte, published by the Forest Service, which should show our winter use along with Plan A, the lower portions of the East Brush Creek are closed to OSV use but the upper portions of the drainage remain open to OSV use. See the images from the pamphlet below.

[(Photo) EXCERPTED: Image of Winter Recreation Guide, East Brush Creek Road]

If the GMUG allowed the lower portions of the East Brush Creek to be open to OSV use, then motorized travel could be possible for skilled recreationists to reach the very upper portions of Pearl Pass road, thus allowing alternative access to Ashcroft instead of the whole Pearl Pass Road along Brush Creek Drainage.

If the GMUG National Forest is not willing to open Brush Creek in its entirety to OSV use, Share the Slate proposes that we open the lower portions of East Brush Creek to allow similar access.

Of great concern are the suggestions for this same area in Plan D. In this alternative, the semi-primitive motorized and semi-primitive non-motorized winter uses are greatly reduced and the area is largely designated primitive. Plan D would completely eliminate this alternative access to Pearl Pass road by designating the upper portions of East Brush Creek as primitive. The area circled in red demonstrates the general area that OSV users would be able to access Pearl Pass Road and the middle green color is designated as primitive in Plan D.

[(Photo) EXCERPTED: Image Plan D would completely eliminate this alternative access to Pearl Pass road by designating the upper portions of East Brush Creek as primitive. The area circled in red demonstrates the general area that OSV users would be able to access Pearl Pass Road and the middle green color is designated as primitive in Plan D.]

5) Crystal Pass / Tilton Pass Areas

Currently, many OSV users are able to access the northern Elks via an area commonly termed as "Tilton Pass". Snowmobilers use this for a "lunch ride" to Aspen and back. Backcountry enthusiasts also enjoy the access this provides to Star Peak and Taylor Peak, which would otherwise really only be accessible in winter and spring from Aspen. This "Tilton Pass" is accessed via Cement Creek Road and drainage which is already designated as semi-primitive motorized. The image below shows the approximate location of Tilton Pass, marked with a red x.

[(Photo) EXCERPTED: Image The image below shows the approximate location of Tilton Pass, marked with a red x.]

This access is maintained in Plans B and C. But, in Plan D, the addition of a semi-primitive non-motorized designation north of Tilton Pass would restrict backcountry skiing access to Star and Taylor Peaks as motorized travel would only be allowed up Cement Creek drainage to Tilton Pass. Plan D would essentially cut off the only winter motorized recreation access to Aspen that we currently have from Crested Butte as current OSV recreationists must go up and over the pass into the valley below to travel to Aspen. The purple region in the image below from Plan D shows this semi-primitive non-motorized designation in purple. The blue color to the north, the Cement Creek Drainage, remains semi-primitive motorized.

[(Photo) EXCERPTED: Image Plan D would essentially cut off the only winter motorized recreation access to Aspen that we currently have from Crested Butte as current OSV recreationists must go up and over the pass into the valley below to travel to Aspen. The purple region in the image below from Plan D shows this semi-primitive non-motorized designation in purple. The blue color to the north, the Cement Creek Drainage, remains semi-primitive motorized.]

6) The Beckwiths and Oh-Be-Joyful

Current Plan A use shows a vast area of land to the north and slightly east and west of East and West Beckwith Mountains, as well as the Oh-Be_Joyful drainage, designated as semi-primitive motorized, shown with the color shaded purple in the image below.

[(Photo) EXCERPTED: Image Current Plan A use shows a vast area of land to the north and slightly east and west of East and West Beckwith Mountains, as well as the Oh-Be_Joyful drainage, designated as semi-primitive motorized, shown with the color shaded purple in the image below.]

The PDF version of Alternative A, however, seems to contradict the Google Earth overlays shown above. In the PDF version (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd952764.pdf), these areas are marked "not yet". It is our belief that the current designations of these areas are correct in the Google Earth overlay, and snowmobiles are currently allowed there and those areas are included in the current winter travel management plan. See the image below, that shows the circled areas in question:

[(Photo) EXCERPTED: Image The PDF version of Alternative A, however, seems to contradict the Google Earth overlays shown above. In the PDF version (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd952764.pdf), these areas are marked "not yet". It is our belief that the current designations of these areas are correct in the Google Earth overlay, and snowmobiles are currently allowed there and those areas are included in the current winter travel management plan. See the image below, that shows the circled areas in question:]

While no plan seems to propose changing this designation in the Beckwith area, Share the Slate would like to ensure that this area remains open to winter OSV use as it provides some great remote recreational opportunities for snowmobilers and backcountry skiers alike. Alternative D proposes the OBJ area as non-motorized. Share the Slate would like to see that area remain open, as it currently is.

Economics

While the economic impacts of hybrid users have not been studied, there is much data showing that snowmobile recreation has a positive impact on local economies. The International Snowmobile Manufacturers Association (ISMA) reports that snowmobilers as a whole spend over \$26 billion on their sport annually in the United States. Over 100,000 full-time jobs are generated by the snowmobile industry in North America including manufacturing,

sales, and tourism. ISMA also reports that there are over 1.3 million registered snowmobiles in the US and 36,900 registered in Colorado.

A 2014-15 study (Economic Contribution of Off-Highway Vehicle Recreation in Colorado - 2014-2015) found that the total economic impact of snowmobiling in Colorado that year was an impressive \$127,229,447, and that number continues to grow.

Locally, Masters in Environmental Management (MEM) students at Western Colorado University collected trailhead data in the Crested Butte area, most recently in 2018 by student Douglas Shaw. The 2017-18 winter season saw far below average snowfall, and in fact some of the monitoring stations were only in use for a small portion of the year. Despite these conditions, motorized users accounted for 6,431 visits out of a total of 15,210 visits at trailheads where motorized use is allowed. Each of these motorized visits represents a direct impact to the local economy, from gas and oil purchases to food and lodging expenditures.

A Connection to Nature is Needed to Preserve Our Public Lands

People's connection to the outdoors is vital to the preservation of our public lands. That connection often happens through various forms of recreation. ISMA cites a Montana State University study and research conducted by Consumer Insights that reports the main reasons why people snowmobile. The primary reasons include: To view the scenery, to be with friends, to get away from the usual demands of life, to do something with their family, and to be close with nature. ISMA also found that 95 % of snowmobilers consider snowmobiling a family activity and that the majority of snowmobile owners are married and have children.

This means that the motorized activity of snowmobiling provides many children with some of their first real exposure to nature and the beauty that our public lands have to offer. For numerous children, the connection begins when dad loads his son or daughter onto the snowmobile with him, traveling miles and miles through the Colorado backcountry, allowing that child to see parts of our public lands that extend far from any road. Then, the child is hooked. They too buy a snowmobile and use it as a tool to enjoy every wild experience that Colorado has to offer in the winter, learning proper stewardship of public lands and understanding the need to advocate for their preservation. That concept is then passed onto future generations of that family. Without that connection, the understanding for the need to preserve our public lands is lost. By isolating or excluding opportunities for specific user groups, we could potentially be paving the way for a disconnect with our public lands, and then future generations won't understand the need to preserve them.

Access to Public Lands Improves Public Health

Many of us recreate on our public lands for our own health and wellness. For example, I have a friend who experiences severe mental health issues on a regular basis. While medication does help, the true medicine for her is the outdoors. It's no secret that Colorado is among the top 10 states with the highest suicide rate in the nation. According to the CDC in 2018, Colorado's rate was 21.9 suicides per 100,000 people. Gunnison County's suicide rate is even higher, with the CDC reporting it to be over 30 per 100,000 people.

Restricting access for specific users to our public lands could cause an increase in suicide attempts as our public land access will be more limited and difficult. The "outdoor medicine" will be harder that helps keep so many people balanced, including my friend, will be harder to access.

Snowmobile Impact on Wildlife

Undoubtedly, all forms of recreation have some impact on wildlife. But many forms of winter recreation, including snowmobiling, have less impact than one might think. First, we would like to point out that game such as deer and elk don't typically winter in areas where we are interested in snowmobility. They tend to gravitate toward

lower elevations that have less snow and more food. That said, here are a few examples of studies that have been done on the presence of snowmobiles and their impact on wildlife:

? A study of white-tailed deer conducted by wildlife science for the Maine Cooperative Wildlife Research Unit over the course of three years found that, "Deer consistently bedded near snowmobile trails and fed along them even when those trails were used for snowmobiling several times daily. In addition, fresh deer tracks were repeatedly observed on snowmobile trails shortly after machines had passed by, indicating that deer were not driven from the vicinity of these trails[hellip]The reaction of deer to a man walking differed markedly from their reaction to a man on a snowmobile[hellip]This decided tendency of deer to run with the approach of a human on foot, in contrast to their tendency to stay in sight when approached by a snowmobiler, suggests that the deer responded to the machine and not to the person riding it." (ISMA Snowmobiling Fact Book, p. 22)

? In a study conducted by the Forest Wildlife Biologists of White Mountain National Forest in New Hampshire titled Snow Machine Use and Deer in Rob Brook, researchers found that deer travel patterns were not affected by periodically heavy snowmobile use. (ISMA Snowmobiling Fact Book, p. 22)

? Located west of the Boundary Waters and in northern Minnesota and sharing a boundary with Canada, Voyageurs National Park had closed its terrain to snowmobiles in 1992 but re-opened 11 bays in November, 2001. Rolf Peterson, a Michigan Tech researcher who is well known for his study of wolves, found that there was no correlation between human use of these areas and wolf activity, even after the bays had been reopened to snowmobiles. (ISMA Snowmobiling Fact Book, p. 23 and Research Studies Relating to Snowmobile Impacts, p. 1)

? PJ White in a 2006 report of wildlife in Yellowstone National Park stated that "human disturbance did not appear to be a primary factor influencing the distribution and movements of the wildlife species studied; there was no evidence that snowmobile use during the past 35 years adversely affected the demography or population dynamics of bald eagles, bison, elk, or trumpeter swans." (Research Studies Relating to Snowmobile Impacts, p. 3)

? In 2003 survey which monitored wildlife/human interactions in Yellowstone National Park, R. Jaffe found that, "87% of 21,936 animals observed during road surveys had no visible response to over-snow vehicles (OSVs). Of the 13% of total animals which exhibited an observable response, 68% looked directly at the people viewing them and then resumed their activity. 32% (of the 13% which had a response) were more active, including walk/swim away, rise from bed, attention/alarm, flight, agitate (buck, kick, bison tail -raise), jump snow berm, and charge. " (ISMA Snowmobiling Fact Book, p. 25)

Preferred Alternatives & Management Changes

In this letter, Share the Slate has demonstrated that:

? OSV users positively impact local economies

? A connection to nature is needed for people to understand the need to preserve our public lands and many seek that connection through motorized activities like snowmobiling

? Snowmobiles have minimal impact on wildlife

As an emerging organization that primarily represents hybrid users (In other words, we use snowmobiles to access routes for backcountry skiing and snowboarding), we enjoy a mix of both human-powered and motorized access. Our blended techniques for access makes us unique because we understand the viewpoints of both motorized and non-motorized users. While some organizations argue that mixed use areas create conflicts

among user groups, Share the Slate believes that through respect, etiquette, and structure, all users can learn to coexist and recreate in the same spaces. After all, it's not about how you recreate, it's that you DO recreate. We feel that isolating or limiting user groups can cause negative impacts on local economies, mental health, and weaken the otherwise powerful experience our youth and adults can have while recreating on public lands, which fosters the desire for stewardship and preservation of our National Forests.

Share the Slate strongly opposes Plan D as we feel that it unfairly targets OSV use for sweeping closures. According to Table 12 on p. 45 of Vol 1 of the DEIS, semi-primitive motorized designations would decrease by 47% in the Gunnison Basin (from 53% to just 6%), with most of that land being classified under multiple non-motorized uses. The Draft Plan cites on p. 71 that one of the goals of the GMUG National Forest is to "encourage visitors to recreate in a variety of settings throughout the national forests, not just in currently popular or concentrated areas". Closing nearly half of our winter motorized terrain in the Gunnison Basin would essentially do the opposite of this by concentrating motorized users to more confined, and thus crowded, spaces.

We suggest that the GMUG National Forest take a deeper look at the current use and how it is represented in Plan A as we have found some discrepancies. While our preferred alternative is Plan C, we realize that the final forest plan will likely encompass portions of all the suggested alternatives. With that in mind, we have listed specific areas we would like to remain open to OSV use, and thus hybrid use, within the confines of the Gunnison National Forest.

We would also like to encourage the GMUG National Forest to remember that vast changes to our management may not be necessary. According to page 30 of the GMUG visitor report and the National Visitor Use Monitoring Program, 95.5% of national forest visits were very or somewhat satisfied with their visit. This seems to be a clear indication that widespread changes to the current management is not needed or desired by an overwhelming majority of visitors.

Thank you for your time and dedication toward ensuring the viability of our public lands. We look forward to seeing changes to the draft forest plan which respects all user groups and a multi-use approach to forest management.