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Comments: [Attachment is verbatim to letter Text]

November 20, 2021

GMUG Plan Revision Team

2250 South Main Street

Delta, CO 81416

Re: Comments on the Draft GMUG Forest Plan

Dear GMUG Planning Team

Thank you for the opportunity to comment on the Draft GMUG Forest Plan, and for all of the hard work that has gone into this important and inclusive process thus far. Please accept these comments on behalf of the board of directors of Gunnison Trails, a non-profit trail advocacy group located in Gunnison, CO. Our mission is to assist land managers and stakeholders in maintaining existing trails, educating users on proper trail etiquette and environmental stewardship and pursuing new opportunities for sustainable trail-based recreation.

Chapter 2, Part I - Social and Economic Environment

FW-DC-PART-01 - Partnerships and Coordination - We are encouraged to see the recommendation to "expand the contracting and partnering opportunities with State and local government, businesses and other organizations." This shared stewardship approach not only is an effective means to complete projects on the ground, it creates more buy-in from local communities and ultimately creates more advocates for the resource. Gunnison Trails is a proud partner with the Gunnison Ranger District, and we look forward to collaborating on future projects on the GMUG.

Chapter 2, Part III - Ecosystem Services and Multiple Uses of the National Forest

1. FW-OBJ-DTRL-04 - Designated Trails - Continental Divide National Scenic Trail. We are pleased to see the objective to relocate the CDNST off of roads within 10 years of plan approval, and we strongly encourage that new segments are open to mechanized use for the remote backcountry experience this trail offers, as well as the increased maintenance and support efforts mountain bike and trail advocacy groups provide.

2. FW-DC-REC-01 - We are excited to see an adaptive management approach as it pertains to "advancements in recreational equipment technologies." Specifically regarding e-bikes, we understand that management of these emerging technologies falls under Travel Management, and we hope the USFS continues to prioritize finding management solutions quickly as equipment rapidly evolves. We hope e-bikes are classified and managed as a separate, unique user category, rather than managed as mechanized along with standard mountain bikes.

3. FW-DC-REC-02 - We recognize the impacts trail-based recreation can have on wildlife and wildlife habitat, and we want to emphasize that trail users are often looking for semi-primitive, dispersed recreational experiences that also support and sustain critically important wildlife habitat. Trail-based recreation and effective wildlife management can occur together, and we believe strategic management of both can lead to more awareness and buy-in from the trail using public. We have several trail networks on Bureau of Land Management land in the Gunnison Basin with seasonal trail closures to protect the Gunnison Sage-grouse and wintering big game. There is strong compliance amongst trail users, and these closures provide an opportunity for a landscape to support both trail-based recreation and wildlife conservation. We hope future trail development in Wildlife Management Areas might be considered using such management tools.

4. FW-OBJ-REC-06 (Within 10 years of plan approval, to reinforce semi-primitive non-motorized settings, eliminate at least two unauthorized motorized travel routes). We are disappointed to see how few unauthorized motorized routes the GMUG proposes to eliminate, and we believe far more than two should be closed within 10 years. Unauthorized motorized routes not only encourage future off-route travel, but they lead visitors to believe such route creation is either allowed or there is little enforcement to stop it. Swiftly closing illegal motorized routes sets a positive example for future visitors and showcases the type of behavior expected on public lands. Working with local organizations and other advocacy groups to close unauthorized motorized routes is a great way to expand partnerships as emphasized in FW-DC-PART-01.

5. FW-GDL-REC-13 - The Gunnison Ranger District has implemented a designated camping strategy that has greatly improved the management of backcountry camping and the associated impacts in the Crested Butte area. Human waste continues to be an issue, and we suggest WAG bags or portable toilets are required for all campers utilizing these designated sites where permanent toilets are not available.

Chapter 3, Management Area Direction

1. MA-STND-WLDF-02 - While Gunnison Trails supports Wildlife Management Areas, we hope management

tools like seasonal trail closures are used to mitigate disturbance and impacts to wildlife rather than a strict route density criteria. Regarding the Flattop Wildlife Management Area, Gunnison Trails has long proposed a non-motorized singletrack route on the east side of Flattop that would connect the Gunnison and Crested Butte communities. We believe a seasonal trail closure specific to the portion of the proposed Gunnison to Crested Butte trail in the Flattop Wildlife Management Area is a better alternative than "no new route" construction as proposed in the Draft Plan. This proposed backcountry route would offer a semi-primitive, long distance trail experience that could be highly managed to avoid disturbance to sensitive wildlife.

2. Special Management Areas - Gunnison Public Lands Initiative - Gunnison Trails is a proud member of the Gunnison Public Lands Initiative (GPLI) working group, a local, collaborative effort to shape land designation here in Gunnison County, and we strongly recommend the incorporation of all elements of the GPLI proposal into the final Forest Plan. Members of the GPLI working group include Wilderness and conservation advocates, wildlife advocates, motorized groups and groups representing mountain bikers, among others. This coalition seeks to protect public lands in Gunnison County while preserving historic uses of the land, thus ensuring more broad-based support. One approach we have taken within the GPLI working group is more prescriptive land designations throughout Gunnison County. The use of Special Management Areas (SMAs) allows for specific and tailored management for individual areas on the Forest and Public Lands. While considerably more detailed than the current management framework, we hope the GMUG Forest Plan will recognize the importance of SMAs and how they can be specifically tailored to meet a landscape prescription while providing for existing and future uses. As the population growth in Colorado continues to grow at an unprecedented rate, SMAs will allow for more specific, small-scale management that can adequately address concerns and impacts in specific areas. The proposed Special Management Areas and Wilderness Area additions in the GPLI proposal are the result of years of hard work and negotiation among working group members, and we are disappointed the full GPLI proposal was not incorporated into Alternative B of the Draft Plan. We strongly support the full incorporation of the GPLI plan in the final Forest Plan.

3. MA-DC-EMREC-01 - We would like to see more specific information regarding the proposed Recreation-Emphasis Corridors (where are they, how large are they, which trails and roads are encompassed within them, etc.) and if they differ between Alternatives. It is difficult to see specifically where these areas are located on the management area maps. We agree with the designation of specific areas and corridors with Recreation-Emphasis focus, but we ask for more clarity on the specifics of each corridor.

Thank you for all of the hard work and time that has gone into this process. We are particularly thankful for all of the online resources, open houses and virtual webinars the Forest has held to better involve the public and to make this process as inclusive and informed as possible. Thank you for the opportunity to comment.

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