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Scott Armentrout Forest Supervisor, USDA Forest Service Delta, Colorado

Electronically submitted via USFS website

Re: GMUG Forest Plan revision

Dear Scott,

Thank you for the opportunity to comments on your Draft Forest Assessment. I can appreciate the complexity of the task at hand, and wish you the best in arriving at a Forest Plan that is in the best interest of the forest ecosystems of the GMUG.

Management designations

I have written previously in support of the Gunnison Public Lands Initiative. It reflects a balanced management approach agreed upon by numerous stakeholders in the Gunnison Forest, calling for Wilderness and Special Management Area designations. I also would support any additional areas being designated as Wilderness, beyond those this group has recommended. Wilderness designation is, in truth, the only way to sustain nearly pristine lands in perpetuity, not precluding this option from future generations' stewardship. Wilderness areas in the Gunnison Forest have contributed greatly to our economy, and will continue to do so for years to come. Our water quality, quantity and temperature depend upon a high level of protection, particularly as climate change impacts increase.

With sustainable energy sources becoming more and more feasible, allowing extractive industries to proliferate runs counter to our future needs, exacerbating climate change impacts even as we attempt to address them. Roadless Areas should remain roadless, and methane should be captured wherever it is produced. Climate impacts need to be assessed when considering any proposal.

It is my fervent hope that a mineral withdrawal designation will be achieved for the mining claims on and related to Red Lady (Mt. Emmons).

Recreation

In reviewing your assessment of Recreation, I find a number of things to comment on. I can't overemphasize the importance of our mountain ecosystems to our entire way of life, whether for recreation, food source, tourism economy or general well-being.

Camping

Dispersed camping near Crested Butte has become a daunting issue in recent years. The Forest Service has taken some actions (i.e. numbering sites in the Slate River and Washington Gulch), but we need to do more. I understand the budget limitations of the Forest Service, but the contributions of voluntary labor cannot be underestimated. Right now, volunteer crews clean up our valleys after visitors leave in the fall, but were we to improve dispersed camping areas such as Musicians Camp on the Slate, bringing them up to formal campground status, some of our problems would be lessened. Facilities and contained firepits are desperately needed, along with education. There is the potential to find non-federal funding sources. Organizations like Volunteers for

Outdoor Colorado and Wildlands Restoration Volunteers, partnering with the Forest Service and others, could provide labor to supplement our local people-power. Let's make an effort to bring these capable organizations into the picture, and find creative ways to fund improvements we need. Campground fees would be one step toward keeping these areas sustainable.

Please include Brush Creek as another valley in the Crested Butte area that is heavily impacted by campers all summer and fall. A similar situation to Musicians Camp exists about five miles up, where there is no facility. As these are de facto campgrounds, providing facilities is imperative. Let's find the funding to protect our water quality!

I did see in your assessment that facilities, etc. "may be needed" in various places. I have to say that we're beyond the "may be" stage, and I'm hopeful that the Forest Plan will recognize the absolute needs and begin to identify ways of implementing solutions.

One use that I did not see mentioned is the proliferation of workers who camp out all summer, i.e. live in the forest, moving only if they are noticed by Forest Service personnel. This further adds to the need for facilities, as many, if not most, of these campers don't bring their own "pack-it-out" toilets.

Trails

You mention that some are advocating parallel trails for different users. I would argue against that, as the proliferation of trails contributes greatly to the fragmentation of habitat. Also, the number of trails has increased greatly since the last Forest Plan, and the cumulative impacts should be considered whenever a new trail is proposed.

One important issue I see is that the current allowable off-road driving distance of 300 ft. needs to be lowered to something much less destructive. People are driving all over the terrain, with user-created roads springing up erratically. This impacts more fragile ground, and vegetation loss is pervasive in many areas, even at high elevations where recovery is incredibly slow. Again, volunteers could be engaged to close off and revegetate disturbed areas, with Forest Service leadership.

There has been a proliferation of events on the forest in recent years, many of which are races. Races often impact multiple trails, virtually closing off these trails to other uses like hiking and recreational biking for their duration, and also contribute to trail degradation. Perhaps the Forest Service could be more selective in allowing races that impact other users' access and experience, as well as the resource.

Your assessment that motorized uses are growing while mountain biking is waning in the Crested Butte area seems counter to what we experience here. Yes, some trails in the Cement Creek drainage are heavily used by dirt bikes, but the overall upper East River valley is an increasingly popular mountain biking mecca. As a hiker, I support mountain biking over motorized uses wherever the question arises. We need to emphasize human-powered recreation wherever possible, particularly for the sake of the wild inhabitants of our forests whose wellbeing is impacted by noise.

I have a concern that in the Crested Butte area, our "Thirteeners" could become the new "Fourteeners", with increasing impacts to fragile terrain from increased visitation. These are likely to require maintenance, and possibly restrictions during the life of the Forest Plan.

Winter

A winter Travel Management Plan for the Crested Butte area is long overdue. Uses such as snowmobiling/hybrid backcountry skiing are increasing in this area and conflicts are already arising. Your assessment says that snowmobile use is decreasing, but also says that backcountry skiing is the "fastest growing segment." These statements may be mutually exclusive, as most backcountry skiing these days incorporates snow machines. I

would hope that a new TMP is forthcoming, but believe that new uses requiring approval should not be approved before the comprehensive plan is created.

Going forward

I would ask that resource protection have a higher priority than any human wants. We will never satisfy everyone's desires, especially as new sports and machinery are invented. There needs to be thoughtful planning and sensible limits on recreation uses in sensitive and overcrowded areas.

As Forest Plans tend to have a lifespan longer than intended, please try to foresee and plan for impacts that are as-yet unrealized on the GMUG. With population projections for Colorado looking astronomical, and finances seemingly diminishing at present, let's set our sights high and use our collective creativity to solve the problems that are sure to manifest in the coming decades.

I appreciate all your effort in this most challenging undertaking!

Sincerely,

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