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Title:

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To whom it may concern:

Thank you for accepting my comment on the GMUG Forest Plan Revision. I am a citizen of Gunnison County, and the owner of the Pioneer Guest Cabins (operating under with a special use permit authorized by the Gunnison Forest Office). I am also the board president of the Crested Butte Mountain Biking Association. I want to stress that these comments are my own personal opinions and are in no way to be considered as positions held by CBMBA. I would like my comments to be considered as a multi-user recreationalist and as a conservation advocate.

I would first like to complement you on creating an incredibly comprehensive, professional assessment. The GMUG employees should be proud of this document. I do not agree with all of the assessments but I am overall impressed with the document. I, in particular, like the "specific ideas" section. It is also refreshing to see that there is a passage indicating the need to have flexibility in managing changing recreation. We don't know what the future will hold so flexibility is key.

My primary use of the public land is as a mountain biker, hiker, skier of all types(on mountain, backcountry, Nordic, backcountry touring), and fat biker. I also like to trail run, elk hunt, fish and I have a snowmobile I occasionally use to access backcountry skiing. In short, I represent what many Crested Butters are, which is people who enjoy our public lands in many different ways. My overall impression of recreation on the GMUG is that all users have amazing opportunities to recreate and enjoy our public lands whether you enjoy motorized or non-motorized recreation. There are challenges ahead and critical management issues that need to be addressed, but overall I feel the USFS does a great job with the resources they have.

Below is a list of the areas in the recreation assessment document that I feel need to be addressed.

#### Infrastructure and funding

My greatest concern is that we have inadequate infrastructure to manage the numbers of users, in particular the absence of sanitation facilities. I live in the Cement Creek Valley and there is one toilet at the pay campground but no other facilities over a 16 mile road with considerable dispersed camping. As indicted on page 42 "securing adequate funding to maintain, construct and/or reconstruct recreation facilities and trails . . .is unlikely to improve." If we do not anticipate additional funding the forest service is going to have to look at how we are going to raise funds to adequately maintain and improve our infrastructure. One glaring issue is hunters, fisherman and motorized users all pay some sort of fee that helps with forest management whether it's a habitat stamp, hunting or fishing tag, or OHV sticker. The majority of the users in the forest are non-motorized users hikers, bikers etc. I would encourage the USFS to find a way so users like myself also have to financially contribute in some way. I would be happy to have to buy a USFS parking sticker for my car (similar to the Red Rock Pass in Sedona), register my bike or some other way to get non-motorized users to pool some money to help manage our forest. Groups like CBMBA, with their workdays and the creation of Crested Butte Conservation Corps, are doing amazing work to help manage and maintain our forests but we will need to increase funding somehow if we are going to be able to build toilets, parking lots, campgrounds etc. I would be happy to contribute to the cause.

The other glaring issue is a lack of funds to hire officers to enforce USFS and Federal laws. One Forest Service

Ranger (Todd Fuller) for the whole GMUG is inadequate. We need to find some more funding so we can better enforce our laws and provide safety to the public. Speeding on forest service roads has surfaced as a major problem largely due to the fact there is virtually no possibility of encountering law enforcement once you enter a dirt forest service road. On Cement Creek Rd. We have had one fatal and numbers of near fatal accidents including a very dangerous biker/dirt biker collision in a narrow canyon. I would love to see a greater law enforcement presence. In order to do that we will need to raise funds as a community.

#### Description of Crested Butte in Geographic area section and State Trends

I feel the document inaccurately describes the Crested Butte area in particular its mention of mountain biking losing ground to dirt biking. I have lived in the Cement Creek Valley for 16 years operating a lodge inside the national forest. I have seen an enormous increase in mountain bike activity and a plateaued or decreased level of dirt bike activity. Please eliminate the last paragraph as it is factually incorrect. Crested Butte should be described as an area that highly values recreation of all different types.

In the State Trends section there is no mention of mountain biking as an increasing sport. Mountain biking is exploding in Colorado and should be mentioned in the State Trends.

#### Recreation Opportunities and Conflict

In general, I think we as a community have made great strides in this area. Before the 2010 Travel Management Plan there was considerable conflict between mostly motorized and non-motorized users. The 2010 plan created more balance when designating trails. More balance has led to less conflict. If there are options for both motorized and non-motorized trails it becomes the users choice of what kind of experience they would like to have. Taylor Park is an example of poor management in my opinion. Since there are virtually no non-motorized opportunities it creates an area where one user group has completely pushed out another. I would encourage you to continue to seek balance in recreation. As I mentioned in my opening paragraph all users have it pretty good here so lets work together to get along.

#### Campgrounds and Dispersed Camping

I love dispersed camping. I desperately want to see it to continue to exist. I would also be willing to pay for the opportunity to have primitive camp spots. Ideally it would be great to have all dispersed camping in designated spots numbered with designated parking, fire pit, tent spot and ideally a pole where users could pay a small fee. They use this system at the Rio Del Norte National Monument in New Mexico and it works very well. The GMUG could create a GMUG camping map similar to the Motor Vehicle Use Map. It could have dots indicating where dispersed camping spots are. They use this system in the Boundary Waters Canoe Area in Minnesota and it is very effective. These spots should be clustered in relative proximity to sanitation facilities. It should only be a short hike, bike ride or drive to a toilet to go the bathroom.

#### Trails and Roads

According to the numbers in this document ( using table 10 ) indicating miles of managed trails there 934 hiker miles, 1219 Pack and Saddle and 310 miles of bike trails. The OHV Vehicle Use Map claims 4414 miles of motorized routes with 1,082 being trails. One of emerging trends in the Crested Butte area is a massive increase in mountain biking but there are limited miles of non-motorized trails. The increases in side-by-sides, Razors etc. have made the motorized roads increasingly dangerous. I would like to see a mention in the forest plan that there is a considerable desire from the public for parallel non-motorized trails along our forest service roads. CBMBA has submitted a great Master Trail Plan which I hope that USFS will consider and absorb into its planning. In the plan is a "Rider Off the Road Initiative" that has great ideas for a Mount Crested Butte to Gothic Trail, a plan to build a non-motorized route along Cement Creek Rd., a trail to get riders off Brush Creek Rd. etc.

Our roads are getting considerably busier as the population of these areas continues to grow. It is in the interest of public safety to see these bike/pedestrian routes created.

Living in the Cement Creek Area I have seen a somewhat amazing transformation and commitment to maintaining the trail network. In only 7 short years since the 2010 Travel Management decision CBMBA has converted every single non-motorized trail in the valley into a sustainable route in the Cement Creek Valley. Considerable progress has been made through trailwork days and grant writing to support Joe Laughlin's USFS trail crew. There have even been a few collaborative workdays between motorized users and bikers. Greg Austin at the Gunnison office has done an amazing job securing OHV grants to do some impressive work on the motorized trails. I think we just need to continue to keep working on these trails in the interest of trail sustainability, resource protection and user experience. Even with all of the work we have done, there is still much to do, as there are a number of motorized trails that have remarkable resource damage. I hope the USFS will continue to target these historic trails and restore them and build them with multi-user sustainability in mind.

The first page of the recreation document accurately indicates that most of the 3000 miles of trails have been user created over generations. Many of trails in the Cement Creek Area were old cattle drives, built by the Civilian Conservation Corps in 1930's or were old horseback routes to Aspen or Taylor Park. I think it is our responsibility as citizens to continue to maintain these historic routes, repair damage, realign old unsustainable sections and prevent further resource damage.

#### Permitting

At some point we may have to consider permitting users in certain areas that are overrun. Consider areas like the Gothic corridor and the Taylor Park area. Once areas are overrun with users it degrades the experience for everyone. I don't think we are at that point yet but if the recreation use continues to grow it may be something that needs considered.

#### Noise and Air Pollution

I have seen a trend toward quieter, less polluting dirt bikes and ATV's but it is still a considerable concern. As a lodge owner I interact with all sorts of visitors to the GMUG. The number one complaint we get is from noise from motorized recreation. I think it would be in everyone's interest including motorized users if there was some kind of noise ordinance or regulation that is enforced. If there was less noise it would improve all users experiences and non-motorized users would have fewer conflicts with motorized users. The "Pipe Down" initiative from the OHV fund is great for educating users, but I think an enforced regulation would be in everyone's interest. If we have less noise we will have fewer complaints about motorized recreation and motorized users will have a stronger argument to maintain and possibly expand their opportunities in the future.

I also would like to see a movement toward regulating emissions. I am an owner of an old polluting snowmobile and I would like to see a point where we phase these old 2 stroke-polluting machines out, including my own. It is in the interest of lowering carbon levels and minimizing our effect on global warming.

#### User Created Shooting Ranges

One recreational activity that is not mentioned in this report is target shooting. I am an elk hunter and like to practice shooting and would love to have a place to properly sight-in my rifle. As a lodge owner, hunters also ask me frequently where they can site in their rifle when they come into Gunnison County. Since there are no designated shooting ranges, people are creating their own in unsafe high population areas. In the Hartman's Rocks area the BLM took a proactive approach and closed one user created range, which was close to a popular trail, and built a proper range with sight-in tables away from the high recreation area. It is also easily accessible to emergency services in case of an accident or fire.

In Cement Creek we have seen a user created shooting range pop up recently up the Walrod drainage (since the closing of the Kebler Pass shooting area). The biggest issue is it is very close to some of the most popular recreation trails in the Cement Creek Valley. This presents serious safety issues and user experience issues. Being in a narrow canyon, noise is amplified and has serious negative effects on people recreating in the area. Furthermore, a rugged jeep road accesses the shooting area. This is of particular concern, as it is not easily accessed by law enforcement or the fire department. Last year a shooter started a considerable forest fire at the location. Luckily it was during a low fire danger period or the fire could have gotten out of control. There is an increasing presence of beetle kill trees in this area and if another fire starts it could easily become incredibly destructive. Due to the fact that the range is in an inaccessible, rugged area, a major helicopter operation was required to extinguish the fire, as the fire trucks could not reach the location. This was all paid for at considerable expense to taxpayers. I had also to personally confront wildly intoxicated shooters firing randomly into the dark at night; people are shooting skeet toward hiking/biking trails (unaware of their presence) and illegally (according to the USFS according to Officer Mike Fuller) using tannerite explosives, often in the early morning hours. Using the BLM and Hartman Rock's as an example. I encourage you, as a recreational shooter and hunter, to find a place in the Gunnison area to build a safe accessible range that is not close to a popular recreation area. I like to go up to the Jack's Cabin and Almont Triangle area to shoot and feel there may be an opportunity to build something up there away from homes, trails and other users.

#### Conservation

In regards to conservation I strongly encourage you to support the GPLI (Gunnison Public Lands Initiative). I am a strong believer in land conservation and preserving our land for future generations. The GPLI is taking a great collaborative approach.

My only other major concern was the limited time frame to respond to this assessment. With 15 sections, some nearly 100 pages long, the 30-day comment period was an insufficient amount of time to expect a private citizen to read and respond. Please extend the comment period to 60 days in the future.

Thanks for your consideration of my comments. I feel we are off to a great start with this Forest Plan revision and I will look forward to seeing the next draft.

Matthew Whiting

Gunnison County Citizen  
Owner Pioneer Guest Cabins