

Data Submitted (UTC 11): 12/9/2017 6:00:26 AM

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Comments: Hello GMUG USFS,

I would like to submit the following comments for consideration for the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forest Land and Resource Management Plan revision in regards to the Draft Assessment 9: Recreation. Many areas of the plan seem accurate and well documented. However, there are several key factors that are either incorrect or omitted. The plan accurately recognizes on page 1 that "Dispersed recreation, or recreation that doesn't occur in a developed site, is the most common way that people use the GMUG." This draft fails to adequately document dispersed recreation and does not address the significant negligence of past Forest Plans to create a legitimate Winter Travel Management Plan.

It is important, as noted on page 7 that "Winter ROS will be inventoried for existing settings as part of the forest plan revision process and published in the final version of this assessment." It is imperative that public input and knowledge be sought out when doing this and that the outcome of this research be made public before it is put into any type of "final version of this assessment" to insure accuracy.

By far my largest concern and problem I see with this draft lies in the "Travel Management / Trails Management" section on page 49. It needs to be noted that "Over-ground travel management plans for the GMUG were completed and amended between 1994 and 2010" is not accurate in regards to winter travel, especially in the Ouray District. The Uncompahgre Travel Management Plan of 2000 cited here, does not come close to adequately addressing Winter Travel Management and no substantive public comment was taken into account during this period regarding over snow travel. During the early 2000's when these plans were being looked at, several groups, individuals, and businesses brought the lack of adequate Winter Travel Management Plan to the Ouray District's attention. They were told to drop the issue in order to let a Travel Management Plan go through that only addressed summer use and that a separate Winter Travel Management Plan would be added. This never happened. And if it did, it was not done with any honest public input as none of the concerned stakeholders were privy to any such plan being made. It is not surprising that this draft does not include what maps were published or when but simply states "(add units) in (add year) per requirements at 36 CFR 212.56". Again, it is not surprising that it was not possible for the Forest Service to "locate a complete set of (ROS) maps", as stated on page 51, as no such data had ever really been collected or put together in a usable manner. The Ouray District/ the GMUG does not have a Winter Travel Management Plan that meets the requirements of 36 CFR 212.56 or the requirements of the Idaho Ruling regarding Winter Travel Management Plans. If the Ouray District/GMUG does not institute a legitimate Winter Travel Management Plan that includes a broader area other than Red Mountain Pass, it will be in violation of the law. It is therefore imperative that the Ouray District/ GMUG institute a legitimate Winter Travel Management plan that is appropriate winter ROS settings of the area, or adopt the Idaho ruling in regards to Winter Travel Management. Creating a Winter Travel Management plan will take legitimate public involvement. It is my belief that if this is done properly and done soon, it is possible to accomplish this important task without significant conflict. I also think that the "Travel Management/Trails Management section on page 49 is unclear to anyone not extremely well versed in 36 CFR 212.5 and needs further explanation so that the public can understand what is being documented and comment on it.

This draft also does not adequately understand or document the significant dispersed recreation on the GMUG. This is evident by the lack of accurate documenting of backcountry skiing. Although it seems that verbiage referring to various types of skiing is used inaccurately throughout the document, these inaccuracies are most apparent to me in the Appendix A. Summary of Recreation Activities by Geographic Area starting on page 55. San Juan Geographic Area: Needs to include winter activities that include "backcountry skiing, alpine skiing, heli skiing, ice climbing, snow shoeing, snowmobiling, and cross-country skiing.

The Lake City, - Ouray- Telluride Triangle: In the third paragraph where it says "snowmobiling, cross-country skiing, and ice climbing," cross country skiing should be replaced with backcountry skiing.

Ouray: Summer activities should put more emphasis on hiking. It could also be noted that San Juan Huts has hiking huts that connect Last Dollar Pass to Ouray. Again, in the last sentence cross country skiing should either be replaced by backcountry skiing or backcountry skiing should be added. Parking at the top of Red Mountain Pass is becoming an issue but also helps keep the number of users at appropriate levels so too many parties are not skiing or riding on top of each-other.

Telluride and Mountain Village/ Greater Telluride Region: This seems to be the only place terminology of skiing, cross country skiing, Nordic skiing, back country skiing, alpine skiing, and heli skiing are used correctly. It also documents both Heli Tracks and the Telluride Ski Area, it seems that San Juan Huts could be mentioned somewhere in here in a similar way (Maybe in the Telluride, Lake City, Ouray Triangle).

Uncompahgre Plateau: Summer use does not recognize that San Juan Hut System clients have been biking on the Plateau for 30 years. The sentence that states "Two long distance mountain bike trails, the Tabeguache and Paradox Trails, provide multi-day opportunities from Telluride to Moab" is not accurate. Neither of these trails go from Telluride to Moab, but one of the San Juan Huts bike routes does.

The Appendix A. Summary of recreation Activities by Geographic Area omits the fact that backcountry skiers have been using San Juan Huts and accessing terrain on the North Side of the Sneffels Range from Telluride to Ouray for over 30 years. I also do not think it accurately reflects the volume of backcountry skiers in the Red Mountain Pass and Ophir areas.

A few other notes on other parts of this draft that could be improved.

It is noted throughout the document that Blue Lakes is at or beyond carrying capacity. It is also mentioned that there may be plans to expand parking and camping facilities in this area (page 13 and elsewhere). Please consider that expanding the parking and camping in this area will also likely increase the number of users well beyond the carrying capacity.

On Page 14 the plan refers to "newer uses such as mountain biking" on the Uncompahgre Plateau are increasing. Mountain bike use on the Uncompahgre Plateau has definitely seen an increase in recent years, however it is not a new use as San Juan Hut Systems has been hosting mountain bikers across the Plateau for over 30 years.

On page 16 the "Winter Recreation Activities" statistics are unclear as to what areas the presented data is from.

On page 38 a few key points are left out of the Motorized and Non-Motorized Recreation discussion. This draft indicates that there are more people who spend more time recreating in non-motorized forms. Therefore, non-motorized recreation areas will draw more people to them and generate more money for local economies.

Another key point that is left out is that motorized users use up significantly more of the resource per person. This is especially true in the winter when one over snow vehicle can literally use up as much untracked powder in an hour as it would take 100 backcountry skiers to use up in an 8-hour day. Powder is a limited resource, protecting more of it for non-motorized use protects more of it for more people and brings in more money for local economies.

On page 61 "The Cimarrons There is a significant problem in the Cimarrons where livestock are living in the Wilderness Area up to and above tree-line. I do not take issue with this in and of itself, but the way they are currently being managed they are spreading thistles like crazy. Whole alpine meadows are now giant thistle patches. I like sheep, cows, and ranchers, and would be sad to see them leave the Cimarron area, but this is something that should be given some thought and strategy.

On Page 66 I am happy to see that it is noted that "The Forest Plan did not establish winter ROS setting across the GMUG National Forest" and I look forward to that being remedied.

One other large omission that I see here is how the Forest Plans to deal with the large amount of die off in the forests as of late.

In closing, whoever is reading this, please know that the work you are doing is very important and will affect our mountains, lakes, and streams as well as our local economies, communities, and lives for generations to come. Know to that good work usually is not easy work. Keep up the good work!

Sincerely,  
Kelly Ryan