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First name: Suzanne
Last name: Vernon
Organization:
Title:
Comments: I am good friends with a landowner in the Green Lake Road area. I hope that concerns of landowners are taken seriously. Since the USFS doesn't have the resources to maintain and protect the area that will be impacted by designating the Green Lake Road a primary route for traffic, the USFS should work with the private landowners in this area safe, beautiful and scenic for the long term.

A recent viral drone video resulted in an increase of motorized traffic up Green Lake Road by a factor of 20 (from 8 cars per weekend to over 100), resulting in residents blocking the road. Although the gate was on a single residents property, most all of the surrounding landowners oppose the public use of GLR and its resultant destruction (supporting road blockage by the gate), even if that meant fighting for this in court.

The USFS does not staff people for crowd control on this route GLR (Green Lake Road), which currently leaves private residents inundated with trespassers and surrounding property destroyed through vandalism. The scenic beauty of the area is being destroyed by ATVs and 4wds going off road disturbing fragile mountain meadows and soils. The vehicles which stay on the road mercilessly tear it up making it unusable for residents, raising dust clouds which coat plants and animals. People drive further and further around mud puddles, making the road a giant scar on the land 40 feet wide in many spots. Off-road vehicles drive off road straight up steep slopes, causing erosion marks which last for years.

The scenic beauty of the area is being destroyed through over-use and lack of management. Please see a picture (Attachment 1) to this statement. This picture was taken last summer by the Irwin Gate which is the spur road off GLR headed to the Scarp Ridge Trail. The damage from an ATV driver who many years ago decided to see if he could make it up a steep slope, starting erosion which wiped away the scant top topsoil leaving a permanent scar on the meadow is evident. The high altitude and thin topsoil with short growing season of this area make it particularly unsuitable for anything but limited foot traffic.

Camping above Lake Irwin, but below private lands on GLR was to be restricted by USFS to designated campsites, however, is not patrolled. These high meadows are being flattened by car and trailer camping, tenting overuse, people driving off road crushing flowers, packing the soil down, starting erosion and scarring the land. This area is an riparian region contributing to Crested Butte's water supply and it is being destroyed contrary to USFS stated goals. Although landowners are subject to stringent septic restrictions, campers constantly occupy the area with limited access to biffies. I have seen human waste along this route. I have also seen people pull up to camp with horse trailers, fencing off the meadows so that their horses may graze and defecate in the meadows which all flow downstream to Lake Irwin.

Private residents on Green Lake Road are forced to do crowd control for the USFS who currently staff 2 rangers for the entire area. I recently called the Gunnison dispatch center to report people camping in illegal campsites and driving ATVs and motorcycles up the road. The only enforcement officer was sick, the other one was hundreds of miles away - so no one came.

There is no control over the area and it is a zoo, with hundreds of people trying to find camping spots on the weekends, driving off the roads, and overfilling the parking spaces at Irwin Lake. The environment in the whole area is being destroyed through over-use.

During the winter, your map designates the Irwin area as a snowmobiling destination even though it has (statistically over a 10 year period) 5x more avalanches than any other snowmobiling areas around Crested Butte. There surely cannot be any rational basis to steer snowmobilers towards injury and death while subjecting

landowners to liability lawsuit. Snowmobiles regularly
tresspass into avalanche zones on private land causing avalanches. Since private landowners do not have tort protections like government entities, they are subject to lawsuits for unmarked hazards, even though the public is trespassing. County enforcment of trespassing laws is weak as they also understaff police departments. Numerous calls and photos reporting trespass over the last four years on my claims have resulted in only one ticket which the Gunnison County DA chose to not prosecute - yet the trespassing and vandalism continue.

Scant foliage (bushes and trees) at high elevations (where the avalanches are started) are ripped up by snowmobilers who drive directly on top of saplings and bushes, cutting off branches. Animals are scattered and driven out of the area by loud motorized snowmobile traffic. Noxious weeds line roads deposited by vehicles.

The current snowmobile designation for the Green Lake Road through the private mining claims is marked as "semi-primitive motorized". This is exactly the area in which an avalanche death occurred 3 years ago. The snowmobiler was traveling immediately adjacent to the Green Lake Road and started an avalanche which crushed him against a tree.

Recommendations:

From what I can tell looking only at the Irwin Area maps, there has been no alterations from the last plan. The last plan resulted in the problems above.

If current winter planning does not incorporate avalanche danger, recent deaths of snowmobilers, noise pollution to residents, damage to possible partial reforestation, threats of lawsuit to private landowners, then in what sense can it be considered 'planning'? Surely rationality must enter into your planning process!

A rational plan will include the following...

In the Winter:

1. Snowmobiling areas should be redesignated away from the Irwin area into areas with few private residents and fewer avalanches. The snowmobile paths should be routed lower down with tree cover to shield from avalanches. Putting recreational areas in avalanche bowls (in the Ruby bowl) is truly foolhardy.
2. Snowmobile routes, if they are included in the Irwin Area, must be actively policed by USFS personnel to keep people out of avalanche zones and away from private property.
3. Winter boundaries designating 'semi-primitive motorized' cannot include avalanche areas where snowmobilers have been recently killed and must be well away from private lands.
4. If USFS personnel are not available to actively police the boundaries between 'semi-primitive motorized' and 'semi-primitive, non-motorized', then these boundaries must be placed miles back from avalanche zones and private property, as snowmobilers without active policing will naturally explore and stray off trail into fresh snow, putting themselves at risk.

In the Summer:

1. Many alternate travel routes should be defined through and around the Lake Irwin Area besides the one major path. This area already supports a major campground. Asking the GLR to support a major travel route from south to north through the Gunnision Forest bring an overly heavy environmental footprint to the area. An alternate route primarily away from private lands (Scarp Ridge Trail) should be used for the main traffic flow through the area instead of GLR.
2. Private landowners should not be made responsible to police and do crowd control for the USFS. If there are thousands of tourists visiting the Lake Irwin area each weekend in the summer, then the USFS must provide at least one person fulltime to police this specific area, hand out tickets for trespasssing, driving off road and

trampling meadows.
3. In this area with high impact from hikers and motorized traffic to Lake Irwin, camping should only be in designated campsites (preferably in the established campsite at Lake Irwin). Camping above the Kebler Pass Road should only be allowed in the campsite at Lake Irwin due to existing environmental damage from traffic, campfires, etc. Visitors in the entire area must be limited to available parking spaces to stop people from parking all over meadows and in the forest, with the attendant destruction of plants, the scarring and danger from campsites, etc.
4. Traffic volumes (camping, motorized, and even hiking traffic) must be controlled and limited to protect the area. If the area is degraded beyond what it currently is, a reservation ticketing system must be used to limit traffic volumes (even hiking).

Your plan for the area must match changing conditions and traffic volumes. For example, a 4wd road to Green Lake might have been acceptable for 8 cars a week. It becomes unacceptable when those traffic volumes rose to 200 cars per week after a drone video went viral. At that point hiking only should be allowed for perhaps 400 hikers a week. If the volume of hikers rises above 400 or the meadows start to be destroyed through trampling by campers, then the number of campers as well needs to be limited by a reservation system and through patrols with ticketing at the trailhead.

Because this area is easily reached by car from Crested Butte, and due to the historical mines, waterfalls, and beautiful mountain meadows filled with flowers, it should be designated a Special Interest Area and receive special protection. Managing this area to preserve the natural beauty will require attention to volumes of visitors which must be managed.

Making this route a sole primary route from north to south without providing alternate routes to spread the traffic out will result in its destruction. This will turn the area into another Tincup, or Animas Valley scenerio with thousands of ATVs/cars per day going to the top. There is no difference in accessibility (or designation of USFS roads regarding ATVs) between Tincup, the Animas Valley, and the GLR. For this reason why should anyone expect any different results in the the environmental destruction to this area compare to the others? At that point there will be an outcry from private landownowners and the public that the USFS must do something. But by that point the natural beauty of the area will be destroyed and it will take decades to recover. I am attaching news articles related to the present and ongoing Tincup and Animas Valley environmental destruction as Attachments 2, 3 and 4.

The Irwin Area already supports a large campground with a large boating recreational area. The area cannot handle the addition of motorized (ATV,4WD) to the top. It also cannot support an enlargement of the current campground without full-time support of a Ranger who can control the public to keep them off of private lands and camping in designated spots. Current levels of environmental destruction exceed the area around the Gothic Research Lab, so we need the same kinds of protections (limitations on dispersed camping) as they received.