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Title: Conservation Coordinator
Comments: Dear Forest Plan Revision Team,

As a citizen who cares deeply about the rivers, streams, wetlands and water resources on the GMUG National Forest, I ask the Forest Service to please consider the following in planning for the future.
1) River access and protection
I ask the Forest to carry forward all streams previously found eligible for designation under the Wild and Scenic Rivers Act, as well as all streams found to be free-flowing and possessing at least one Outstandingly Remarkable Value (ORV). These eligible streams include the following:

1. Anthracite Creek
2. Bear Creek
3. Beaver Creek
4. Bridal Veil Creek and Falls
5. Copper Creek
6. Copper Lake Tributary
7. Cottonwood Creek
8. Cow Creek
9. Difficulty Creek
10. East River
11. Escalante Creek
12. Fall Creek
13. Horsefly Creek
14. Ingram Falls
15. Kelso Creek
16. Lower Taylor River
17. Monitor Creek
18. Muddy Creek
19. North Fork Escalante Creek
20. Oh-Be-Joyful Creek
21. Oh-be-joyful Creek, Peeler Basin Tributary, Blue Lake Tributary and Dippold Basin Tributary
22. Peeler Basin Tributary
23. Points Creek
24. Potter Creek
25. Roubideau Creek
26. Ruby Fork Anthracite Creek
27. Queen Basin Tributary to Copper Creek
28. San Miguel River
29. Slate River
30. Tabeguache Creek
31. Triangle Pass Tributary to Copper Creek
32 Upper West Soap Creek
33. West Elk Creek
34. Wetterhorn Creek
35. Wildhorse Creek

All of these streams are free-flowing and possess at least one ecologically or culturally significant value, as detailed in Forest documents and comment letters.

Additionally, I ask the Forest to better prioritize natural water infrastructure in the Forest Plan. This includes developing an overarching "Aquatic Ecosystems" section within Part II: Forest Direction. This will illustrate the connection between the watersheds, water resources, aquatic systems, riparian zones and ground-water dependent ecosystems. Additionally, the Forest should develop a "Water Resources" section within Part III: Ecosystem Services and Multiple Uses to define the ecosystem services provided by the Forest's natural water resources. Neither sections are currently part of the draft plan. Finally, I recommend the Forest prioritize the use of nature-based solutions to protect and restore the rivers, streams, wetlands and other natural water infrastructure that provide multiple benefits for humans, wildlife and the environment.
The Wild and Scenic Rivers Act offers the greatest protection for our waterways, but it very clearly allows camping within 100' of water.
2) Camping
Campsites within the Gunnison National Forest, specifically surrounding Crested Butte have seen many long standing dispersed campsites removed. All of our forests have seen increased use and pressure and do require better management. Rather than a plethora of "closed" signs causing a negative experience, I suggest more information and education. I do support camping in designated sites, however existing and well established sites should not be removed simply due to being within the 100' of water. Many rivers have wonderful camps at waters edge and those of us that use the forest for these waters want to be streamside. Your own campgrounds are within 100' of water in many locations. Please do no remove those that are streamside and dispersed. Additionally, many are not only being closed, but the parking for day access has been blocked off where anglers and guides have accessed the water for generations. This is causing crowding and conflict in other "designated" areas and rouge parking spots being developed and increasing the impact.
With increased camping demands, more campgrounds should be established and existing ones should have greater density. Established campsites should be remained in the inventory and not closed.
Dispersed campsites should not go on a registration system as this removes locals from the ability to go camping in their local environment. These should remain on a first come first serve basis. Campgrounds and facilities are what visitors are looking for. Dispersed use areas would also benefit from infrastructure, including signage, permitting, bathrooms, and proper information. Biophysical impacts can be mitigated by providing information, trash receptacles, bathrooms, parking, and designated access. Increasing facilities at high use areas are recommended as we as suggesting portable toilets or WAG bags for all overnight users in areas without toilet facilities.
I've seen many areas removed from the overnight camping inventory that has actually created increased trash and human waste because these areas are now day use areas where no one cleans up after themselves. When there were campsites, the impact was less. I am happy to provide documentation and photographs.

3) Winter Access:
Specific Areas of Concern

Given that our organization is based in Gunnison County, our specific areas of concern are located within the Gunnison National Forest. This does not mean that we condone closure of public lands to specific winter user groups in the Grand Mesa or Uncompahgre National Forests. But, our use and therefore awareness of these areas in winter is limited and we do not feel we have the knowledge to address details. Our specific concerns regarding potentially closed areas of the Gunnison National Forest are listed below:

1.Poverty Gulch

Poverty Gulch located up the Slate River drainage NW of Crested Butte is a favorite hybrid use area. Many hybrid users can access the Baxter Gulch area via snowmobile when snow conditions allow. The northeast slopes of the subpeak 11,861 of Schuylkill Mountain allow a unique opportunity for "sled laps" below the bench at 10,600', where hybrid users can ride a snowmobile to the top of the route that they intend to ski or snowboard down. The northern boundary of the primitive designation proposed in Plan D will eliminate OSV access to this

special zone. Furthermore, a creek that defines the western boundary of the northern edge of the proposed Poverty Gulch Wilderness is difficult to define with snow cover. Additionally, while the proposed boundary allows snowmobiles to stay on the road north of the actual Poverty Gulch, this area is prone to avalanche activity. Many prefer to sled along the southern (north-facing) edges of the gulch. Essentially, the proposed primitive boundary closes a safe access point and forces people to use an avalanche prone slope. For all of these reasons, Share the Slate suggests moving the northern edge of the Poverty Gulch Wilderness to the northeast ridge shown in the image below:

If the Poverty Gulch Wilderness boundary cannot be moved, Share the Slate would like to see the southern border of the Poverty Gulch SMA moved to meet the Poverty Gulch Wilderness boundary, essentially following the 9600' contour line. Snowmobiling on the road can often be dangerous, putting recreationists who cross this warm south facing slope in unnecessary avalanche danger.. For safety reasons, many hybrid users tend to travel into Baxter Basin closer to the valley floor, south of the stream. Moving the southern edge of the SMA boundary to the 9600' contour, or further south, would ensure that safe motorized access is maintained to the Baxter Gulch area.

Our concern with this boundary only appears in Plan D. The boundary in Plans B and C remain the same as the current use Plan A. We realize that this primitive boundary is based on the GPLI proposal, and the intended Poverty Gulch Wilderness area. We would like to make it clear that we were not included in the GPLI discussions as a user group. While we did make comments about this specific boundary to them, the location of this boundary remains unchanged in the GPLI Proposal.

2.Plan A Designation of Brush Creek

We have found what we believe to be a discrepancy or misrepresentation of current use on Plan A in the Brush Creek zone. The image below shows the Brush Creek area including West, Middle, and East Brush Creek, as under a semi-primitive non-motorized designation.

Many people currently travel up the main Brush Creek to West Brush Creek drainages with the understanding that the road is open to OSV use. A pamphlet titled Winter Recreation around Crested Butte, published by the Forest Service, shows that this road is open to winter motorized use. Included below are screenshots from the pamphlet.

The current Plan A needs to make it clear that the West Brush Creek Road is open to OSV use. This clarification must filter into Plans B, C, and D as well.

Share the Slate would like to ensure that OSV access to the West Brush Creek Drainage is maintained. This provides valuable backcountry skiing opportunities around Teocalli Mountain that would otherwise be extremely difficult for skiers to access.

3.Pearl Pass Area

Share the Slate would like to obtain winter motorized access to Pearl Pass because of the unique skiing

opportunities in the area. While avalanche and snow conditions allow access to this area for usually only a few weeks each year, the unique backcountry skiing opportunities available during that time are unmatched. The current use Plan A shows that motorized access is closed on Pearl Pass Road and the Brush Creek Drainage. Therefore, we will have no alternative but to drive over 4 hours to Ashcroft in the spring to access the skiing opportunities that could otherwise be easily accessed from Crested Butte should OSV use be allowed on Pearl Pass Road. This is a motorized area in summer and we would like to maintain access to the other side of the Elk Mountains via this traditionally motorized path. We encourage the GMUG National Forest to open this corridor to OSV use.

4.East Brush Creek

According to the pamphlet mentioned above titled Winter Recreation around Crested Butte, published by the Forest Service, which should show our winter use along with Plan A, the lower portions of the East Brush Creek are closed to OSV use but the upper portions of the drainage remain open to OSV use. See the images from the pamphlet below.

If the GMUG allowed the lower portions of the East Brush Creek to be open to OSV use, then motorized travel could be possible for skilled recreationists to reach the very upper portions of Pearl Pass road, thus allowing alternative access to Ashcroft instead of the whole Pearl Pass Road along Brush Creek Drainage.

If the GMUG National Forest is not willing to open Brush Creek in its entirety to OSV use, Share the Slate proposes that we open the lower portions of East Brush Creek to allow similar access.

Of great concern are the suggestions for this same area in Plan D. In this alternative, the semi-primitive motorized and semi-primitive non-motorized winter uses are greatly reduced and the area is largely designated primitive. Plan D would completely eliminate this alternative access to Pearl Pass road by designating the upper portions of East Brush Creek as primitive. The area circled in red demonstrates the general area that OSV users would be able to access Pearl Pass Road and the middle green color is designated as primitive in Plan D.

5.Crystal Pass / Tilton Pass Areas

Currently, many OSV users are able to access the northern Elks via an area commonly termed as "Tilton Pass". Snowmobilers use this for a "lunch ride" to Aspen and back. Backcountry enthusiasts also enjoy the access this provides to Star Peak and Taylor Peak, which would otherwise really only be accessible in winter and spring from Aspen. This "Tilton Pass" is accessed via Cement Creek Road and drainage which is already designated as semi-primitive motorized. The image below shows the approximate location of Tilton Pass, marked with a red x.

This access is maintained in Plans B and C. But, in Plan D, the addition of a semi-primitive non-motorized designation north of Tilton Pass would restrict backcountry skiing access to Star and Taylor Peaks as motorized travel would only be allowed up Cement Creek drainage to Tilton Pass. Plan D would essentially cut off the only winter motorized recreation access to Aspen that we currently have from Crested Butte as current OSV recreationists must go up and over the pass into the valley below to travel to Aspen. The purple region in the image below from Plan D shows this semi-primitive non-motorized designation in purple. The blue color to the north, the Cement Creek Drainage, remains semi-primitive motorized.

6.The Beckwiths and Oh-Be-Joyful

Current Plan A use shows a vast area of land to the north and slightly east and west of East and West Beckwith Mountains, as well as the Oh-Be_Joyful drainage, designated as semi-primitive motorized, shown with the color shaded purple in the image below.

The PDF version of Alternative A, however, seems to contradict the Google Earth overlays shown above. In the PDF version (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd952764.pdf), these areas are marked "not yet". It is our belief that the current designations of these areas are correct in the Google Earth overlay, and snowmobiles are currently allowed there and those areas are included in the current winter travel management plan. See the image below, that shows the circled areas in question:

While no plan seems to propose changing this designation in the Beckwith area, Share the Slate would like to ensure that this area remains open to winter OSV use as it provides some great remote recreational opportunities for snowmobilers and backcountry skiers alike. Alternative D proposes the OBJ area as non-motorized. Share the Slate would like to see that area remain open, as it currently is.

Economics

While the economic impacts of hybrid users have not been studied, there is much data showing that snowmobile recreation has a positive impact on local economies. The International Snowmobile Manufacturers Association (ISMA) reports that snowmobilers as a whole spend over $26 billion on their sport annually in the United States. Over 100,000 full-time jobs are generated by the snowmobile industry in North America including manufacturing, sales, and tourism. ISMA also reports that there are over 1. 3 million registered snowmobiles in the US and 36,900 registered in Colorado.

A 2014-15 study (Economic Contribution of Off-Highway Vehicle Recreation in Colorado - 2014-2015) found that the total economic impact of snowmobiling in Colorado that year was an impressive $127,229,447, and that number continues to grow.

Locally, Masters in Environmental Management (MEM) students at Western Colorado University collected trailhead data in the Crested Butte area, most recently in 2018 by student Douglas Shaw. The 2017-18 winter season saw far below average snowfall, and in fact some of the monitoring stations were only in use for a small portion of the year. Despite these conditions, motorized users accounted for 6,431 visits out of a total of 15,210 visits at trailheads where motorized use is allowed. Each of these motorized visits represents a direct impact to the local economy, from gas and oil purchases to food and lodging expenditures.

In conclusion, I ask that local community input be considered and how the revision affects those local users and caretakers. Local support can be used for campgrounds and facilities. Local signage that is educations will improve the user experience while reducing impact. Please keep access for locals as a priority. We are the ones that moved to our homes for this access. Do not remove us from the equation.

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