Data Submitted (UTC 11): 10/30/2023 6:00:00 AM
First name: Hilary
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Organization: Winter Wildlands Alliance
Title: Policy Director
Comments: On behalf of Winter Wildlands Alliance, Colorado Mountain Club, and Outdoor Alliance I am respectfully submitting the attached objection (WWA_CMC_OA_GMUG Forest Plan_objection.pdf) to the GMUG forest plans. Thank you for your consideration. A hard copy can be provided upon request.

October 27, 2023

USDA Forest Service, Rocky Mountain Region

Attn: Reviewing Officer

C/O Director of Strategic Planning

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Lakewood, CO 80401

Submitted online at https://cara.fs2c.usda.gov/Public//CommentInput?Project=49606

Re: Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision #51806 objection

Dear Objection Reviewing Officer, Objectors Winter Wildlands Alliance (WWA), Colorado Mountain Club (CMC), and Outdoor Alliance (OA) file this objection to the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan, Draft Record of Decision (draft ROD), and Final Environmental Impact Statement (FEIS), noticed August 31, 2023. Chad Stewart, GMUG National Forests Supervisor is the Responsible Official. Our organizations have submitted comments throughout the forest plan revision process - at scoping (June 1, 2018), on the working draft (July 26, 2019), and on the draft plan (November 23, 2021). As members of Outdoor Alliance, WWA and CMC also helped to develop, and are signed on to, comments submitted by OA throughout the plan revision process, including draft plan comments submitted November 22, 2021.

The majority of our comments, and this objection, relate to the GMUG's development and application of the winter Recreation Opportunity Spectrum (ROS). We appreciate that FW-GDL-REC-16 in the final plan states that travel planning and other project-specific planning should be consistent with the ROS. In order for this guideline to be most effective, it's critical that the winter ROS descriptions and map be modified per the resolutions we describe in this objection.

Objection 1: Semi-primitive settings should allow for warming huts, cabins and rustic facilities, and should not be bound by overly restrictive size or remoteness classifications.

Our organizations previously commented on Semi-primitive non-motorized and motorized settings in CMC and WWA's draft plan comments (page 3) and OA's draft plan comments (page 18). In WWA and CMC's draft plan comments, we suggested that the availability of warming huts, cabins and rustic facilities should be included in both Semi-primitive settings to facilitate overnight backcountry travel, particularly in winter. We object to the draft ROD and FEIS because Tables 13 and 14 do not include language allowing for the existence of warming huts, cabins, and rustic facilities that are important for users to enjoy multi-day trips into the forest and backcountry travel. For example, this change in language is important because the San Juan Huts and other facilities are located within semi-primitive settings and provide an important recreation and economic opportunity for local communities without detracting from the semi-primitive setting of their surroundings. While we understand that Tables 12-16 are derived from FSM 2300, Chapter 10, the GMUG has leeway to adapt the FSM language to suit its unique needs (such as the Forest did when developing 3 Wilderness ROS subclasses).

Relatedly, the winter ROS should recognize the unique nature of the forest in winter. Specifically, how deep snows create semi-primitive settings relatively close to roads or other developed areas. The "size" and "remoteness" classifications in the Recreation Opportunity Spectrum are overly restrictive and prevent landscapes with primitive or semi-primitive non-motorized character from inclusion in the setting. Furthermore, the Remoteness description in Table 13 (Semi-primitive non-motorized) is confusing because it is defined by a distance from designated motorized routes and areas but the GMUG has not completed Subpart C (winter) travel management planning and therefore has not designated winter motorized routes and areas across the forest. At the very least, the Semi-primitive non-motorized and motorized settings should be consistent in terms of being defined as a certain distance from plowed roads. Otherwise, the ROS map is essentially dictating that large non-motorized areas can only be accessed after first traveling through a significant amount of motorized terrain.

Resolution: Amend the descriptions for winter ROS characteristics in Tables 13 and 14 as follows:

Table 13:

*Remove the size requirement for winter settings.

*Remoteness (winter) - One-half mile or more from designated motorized routes and areas a plowed road.

*Managerial - Motorized equipment such as trail groomers may be authorized under permit to provide non-motorized recreation opportunities. Warming huts, cabins and rustic facilities may be present but are rare. No other infrastructure or facilities typically available.

Table 14:

*Remove the size requirement for winter settings.

*Public Access - suitable for travel by motorized over-snow vehicles Ungroomed, marked over-snow vehicle routes and areas. Ungroomed ski trails. Over-snow vehicle use on designated routes/areas. Groomed ski (non-motorized) and motorized trails may also exist. Warming huts, cabins and rustic facilities may be present. Few, if any, facilities or services available."

Objection 2: Winter ROS settings should specify that over-snow vehicle use is only permitted in designated areas and on designated routes.

Most recently, we raised this issue on pages 3 and 4 of CMC and WWA's draft plan comments as well as page 19 of OA's draft plan comments. The Over-Snow Vehicle Rule (36 CFR [sect] 212) requires that National 1 Forests complete over-snow vehicle (OSV) travel planning and, once completed, manage OSV use under a "closed unless designated open" framework (36 CFR [sect] 212.80). Although the GMUG has yet to conduct this necessary planning, the winter ROS describes the desired future conditions on the forests. Therefore it should reflect compliance with required travel management regulations, including future management of OSV use under the required "closed unless designated open" framework following OSV travel planning.

Resolution: Amend Tables 14, 15, and 16 as follows, to specify that motorized over-snow vehicles are only permitted on designated routes and within designated areas:

*Public Access - suitable for travel by motorized over-snow vehicles on designated routes and within designated areas.

Objection 3: The Winter ROS maps fail to describe desired future conditions for winter settings, are predicated on misleading or incorrect assertions concerning the GMUG's compliance with the Over-Snow Vehicle Rule, and unjustly deem important non-motorized winter recreation areas suitable for OSV use.

We previously commented on our concerns regarding the Winter ROS maps on pages 4-7 of CMC and WWA's draft plan comments, in earlier comments throughout the forest plan revision process, and on pages 13 and 14 of OA's draft plan comments. We remain concerned that resources associated with the final plan assert that Winter Travel Planning has been completed on the majority of the GMUG without having ensured that previous decisions meet the minimization criteria as required in Subpart C of the Travel Management Rule. 1 The forest has not produced any Over-Snow Vehicle Use Maps since the planning rule was revised in 2015 and, until the 2021 publication of the forest plan revision Story Map, data concerning what was or was not open/closed to OSVs was never available to the public in GIS form. Thus far it appears that winter travel planning on the GMUG consists of a few areas on the Uncompahgre and Grand Mesa listed as closed to OSV use without fully analyzing the remainder of the forest deemed "open to OSV" or "no restrictions." This "open unless closed" framework is in direct conflict with the revised Travel Management Rule but strongly influenced the development of the winter ROS map, to the detriment of non-motorized settings. Upon examining the final winter ROS map, we object to the draft ROD and FEIS for the following reasons:

1. We object to zoning Semi-Primitive Motorized areas adjacent to Wilderness boundaries. In many areas, Semi-Primitive Motorized settings border Wilderness, even Pristine Wilderness, settings (See Grand Mesa, Uncompahgre and Gunnison National Forests Preferred Alternative Winter Recreation Opportunity Spectrum Map, March 16, 2023). We previously commented on locations where motorized designations bordering Wilderness raised concerns for our organizations (Draft Plan Comments at pages 5-7). 1 ROS webmap: "The preferred alternative is an effort to capture the current inventoried condition. The exception is in the Gunnison basin where winter travel management decisions are still pending. Your comments on this and other sections have helped shape the final alternatives." 2 Zoning areas bordering Wilderness as motorized sets the stage for future management issues and Wilderness incursions, by potentially allowing cross-country OSV use right to the border of Wilderness. Motorized areas bordering Wilderness will negatively affect Wilderness character given the Forest Service's known struggles with OSV incursions into Wilderness nation-wide. The Forest Service is often unable to adequately patrol, or even mark, Wilderness boundaries against OSV incursions due to limited resources. The Wilderness boundary is often not an obvious terrain feature in winter because many boundaries follow section lines or other mapping features that don't necessarily translate to easy-to-follow on-the-ground features. OSV use in Wilderness is not only illegal, it poses a significant use conflict with skiing and snowshoeing

Wilderness visitors, as well as significant impacts to the natural resources and wildlife intended to be protected by a Wilderness designation. OSV use adjacent to Wilderness also creates a significant acoustic impact on Wilderness character, which is out of line with the ROS settings applied to Wilderness areas. Generally, in winter, Semi-Primitive Non-Motorized or Primitive settings should border Wilderness wherever possible. If there are clear topographic delineations such as cliffs, rivers, or sharp ridgelines it may be appropriate for there to be a Semi-Primitive Motorized setting bordering Wilderness, but this would be a rare exception.

2. We object to extensive Roaded Natural settings within otherwise non-motorized settings. Roaded Natural settings surrounded by non-motorized settings can be a useful and necessary way to allow OSV access along forest or county roads for the purposes of sightseeing or accessing private inholdings. However, where Roaded Natural settings are intended to allow OSV access along forest or county roads, the Roaded Natural setting should be a narrow corridor restricted to the road bed. Simply utilizing a GIS buffer that does not account for terrain or desired use of the landscape is not an adequate approach to ROS mapping.

3. Many areas that are highly valued for non-motorized winter recreation and access are zoned as "suitable for OSV use" in the final plan's winter ROS map, often with no understandable justification for doing so. We commented on many of these areas after reviewing the different winter ROS maps for each Alternative in the 2021 draft plan (Draft Plan comments at pages 5-7) and continue to have objections in the following areas:

*Telluride/Ophir: We object to designating the area between Telluride Mountain Resort and the San Juan National Forest (Bear Creek and Bridal Veil basins, and adjacent terrain) as Semi-Primitive Motorized. This area has historically been non-motorized and is used heavily by backcountry skiers and guided heli-skiers. There is no historic OSV use in this area but there is a strong local desire to see it continue to be a non-motorized winter recreation area. Furthermore, the Bear Creek Road is a non-motorized road so it's difficult to conceive of how OSVs would enter the Bear Creek area or why the GMUG would deem the surrounding area suitable for OSV use. The one exception, or place within this larger area where OSV use occurs and is suitable for future use, is the Blue Lakes road (FR 636) up to where there are two private residences at approximately 10,200 feet, adjacent to Bridal Veil Creek. This road corridor, up to the private 3 residences, should be zoned as Roaded Natural to allow continued access for private property owners.

*Cimarrons: The final plan zones the West Fork of the Cimmarron River as a Semi-Primitive Motorized cherry-stem into the Uncompahgre Wilderness. To improve manageability of the Wilderness boundary in winter and reduce OSV incursions, this drainage, where it is surrounded by Wilderness, should be zoned as Semi-Primitive Non-Motorized.

*Crested Butte: There are 5 drainages surrounding Crested Butte that are highly valued for winter recreation. We are disappointed that the final plan zones all 5 of these drainages as suitable for OSV use, leaving no area for skiers and snowshoers to have the opportunity for a fully non-motorized, quiet winter recreation experience and believe the winter ROS map should be improved in the following ways:

*Slate River Road: We support the Semi-Primitive Motorized setting prescribed in the final plan for the Slate River road to allow OSV access to Pittsburg and hybrid skiing access along the road corridor. We also support and appreciate that the headwaters of the Slate River, Baxters Basin, and the Mineral Point area are mapped as Semi-Primitive Non-Motorized to allow for human-powered skiing and splitboarding as well as to protect the upper watershed and fragile alpine vegetation in this area. However, we object to there being a Semi-Primitive Motorized setting for the terrain north and east of Pittsburg. This area is highly valued for human-powered backcountry skiing/splitboarding, with easy access from Pittsburg, and should be classified as Semi-Primitive Non-Motorized.

*Washington Gulch: This is a popular cross-country ski and snowshoe destination with close access to the towns of Crested Butte and Mt. Crested Butte and a small trailhead with limited parking. There is also a new

backcountry ski hut located in Washington Gulch and very limited off-trail terrain physically available for OSV use. For these reasons, it should be zoned as Semi-Primitive Non-Motorized. We object to the Semi-Primitive Motorized setting applied in the final plan.

*Brush Creek Road: We object to the winter ROS zoning along the Brush Creek Road. Otherwise known as County Road #738, Brush Creek Road should be zoned as Semi-Primitive Non-Motorized as proposed in Alternative D. This road is the approach to the Friends Hut, a popular backcountry hut and tour destination, and part of the course for the Grand Traverse Race. This area is historically a non-motorized area. In this same general area, the final plan should adopt the Alternative D winter ROS map for the Dry Basin/Deer Creek area. The Final Plan allocates a Semi-Primitive Motorized winter ROS setting for Deer Creek and the terrain bordering the Maroon Bells Snowmass Wilderness boundary. There's no feasible way to manage OSV use up to this Wilderness boundary without inviting incursions given that the boundary is not clearly defined by physical features on the ground. Alternative D, in comparison, protects the Wilderness by zoning a Non-Motorized (Pristine) setting between 4 Semi-Primitive Motorized and Wilderness, and delineated the suitable for motorized/non-motorized boundary along obvious topographic features.

*Irwin: We object to the motorized settings applied in the final plan to the area to the north and west of Lake Irwin (known as Robinson Basin and including Ruby Peak, Green Lake, Mount Owen and Scarp Ridge). This area should be zoned as Semi-Primitive Non-Motorized to improve public safety and minimize conflict with private property owners. The slopes surrounding the basin are steep and prone to avalanches in winter. Currently there is no legal access route across private property north of the lake without traversing slopes that exceed 35 degrees and risk triggering avalanches onto private property. Several snowmobile deaths have occurred in this area on both public and private property. Additionally, Lake Irwin is 1.25 miles from the closest boundary of the Raggeds Wilderness and only 2.2 miles from the northernmost point of the lake to the top of the drainage (which is also the Wilderness boundary). A non-motorized setting in the basin is necessary to achieve the Primitive ROS setting for the surrounding Wilderness area. A motorized setting from County Road 12, along FSR 826 and around Lake Irwin is appropriate to accommodate current use. The Semi-Primitive Non-Motorized area we have proposed would only limit OSV suitability on ~2,500 acres, much of which is inaccessible to motorized vehicles because of slope angle. The forest did not include analysis of a non-motorized setting in any alternative for this area should include analysis and a decision to support a Semi-Primitive Non-Motorized ROS setting.

Resolutions

1. Wilderness areas should be bordered by primitive or semi-primitive non-motorized winter settings with topography or other obvious landscape features (ridgelines, cliffs, streams, etc.) defining the boundaries of motorized/non-motorized settings.

2. Where Roaded Natural settings are intended to allow OSV, or wheeled vehicle, use only along a road in an otherwise Semi-Primitive Non-Motorized or Primitive setting, the Roaded Natural setting should be narrowly restricted to the road corridor.

3. Make specific changes to the winter ROS map described above:

*Designate the area between Telluride Mountain Resort's boundary and the San Juan National Forest (Bear Creek and Bridal Veil basins, and adjacent terrain) as Semi-Primitive Motorized, with a narrow Roaded Natural corridor along the Blue Lakes road (FR 636) up to where there are two private residences at approximately 10,200 feet.

*Designate the non-Wilderness lands along the West Fork of the Cimmarron River, where these lands are

surrounded by the Uncompahgre Wilderness, as a Semi-Primitive Non-Motorized.

*Designate the terrain north and east of Pittsburg as Semi-Primitive Non-Motorized.

*Designate Washington Gulch as Semi-Primitive Non-Motorized. 5

*Designate the Brush Creek Road and surrounding area as Semi-Primitive Non-Motorized.

*Designate the Deer Creek area adjacent to the Maroon Bells Snowmass Wilderness as Semi-Primitive Non-Motorized, as mapped in Alternative D.

*Designate the area to the north and west of Lake Irwin (known as Robinson Basin and including Ruby Peak, Green Lake, Mount Owen and Scarp Ridge) as Semi-Primitive Non-Motorized.

Thank you very much for your consideration of the above objection. We would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections or of any further opportunities to comment. We look forward to the final, final forest plan.

Sincerely,

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