

September 25, 2019

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

Re: GMUG Working Draft Forest Plan

Dear Plan Revision Team,

Thank you for considering the following feedback from Outdoor Alliance and Outdoor Alliance Colorado regarding the Grand Mesa, Uncompahgre, and Gunnison (GMUG) Forest Plan Revision Working Draft Forest Plan (#51806). We recognize and genuinely appreciate the effort that the GMUG planning team has dedicated to the GMUG Working Draft Plan and are grateful for the opportunity to provide feedback.

In early August of 2019, Outdoor Alliance submitted the *Outdoor Alliance GMUG Vision* (OAGV)¹ and OAGV interactive online maps² as feedback on the Working Draft Plan. The OAGV was developed in partnership with outdoor recreation and conservation organizations working across the GMUG National Forests. The OAGV reflects both forest-wide and place-based recommendations that enjoy broad support from local community members, as well as regional and national stakeholders. The OAGV considers other citizens' proposals for the GMUG and seeks to offer a comprehensive vision from the outdoor recreation community. Through this collaborative process, the OAGV identifies seventeen forest-wide policy recommendations, ten new designated areas and site-specific management unique to the OAGV, and endorses three outside citizens' proposals and seven additional designated area recommendations from separate coalitions. Outdoor Alliance offers these community-sourced recommendations as a comprehensive vision for world-class sustainable outdoor recreation in the GMUG National Forests.

¹ Outdoor Alliance. (2019). *A Vision for the Future of Outdoor Recreation on Colorado's National Forests — Outdoor Alliance*. [online] Available at: <https://www.outdooralliance.org/blog/2019/8/2/a-vision-for-the-future-of-outdoor-recreation-on-colorados-national-forests> [Accessed 13 Sep. 2019].

² Outdoor Alliance. (2019). *Outdoor Alliance GMUG Vision Maps*. [online] Available at: <https://arcg.is/1OniLi0> [Accessed 13 Sep. 2019].

We recognize that the scope of the OAGV goes beyond simply offering feedback on the GMUG Working Draft Plan. To help the Planning Team better integrate our feedback into the planning process, we have prepared this additional feedback letter. This letter is organized in two sections: 1) feedback directly on the language contained in the Working Draft Plan, and 2) data analysis comparing the OAGV to the Working Draft Plan.

We are also available to meet via phone or in person to assist the planning team with answers to any questions you may have about this feedback or the OAGV. We share an interest in how recreation resources are managed on the GMUG National Forests and hope that we can be a valuable partner for the planning team throughout the plan revision process.

Section 1 – Direct Comments on the GMUG Working Draft Forest Plan

In the first section of our feedback we provide direct comments on the direction and language in the GMUG Forest Plan Revision Working Draft Forest Plan (#51806). This feedback is informed by the collaborative work performed during the development of the OAGV.

Outdoor Alliance’s overarching feedback is that we hope to see a greater level of detail in the Draft Plan slated to be released this coming winter. There is great work in the Working Draft Plan, but the level of specificity in many areas should be improved.

We also hope to see a greater recognition of the incredible role that outdoor human-powered recreation plays in the local communities adjacent to the GMUG. The GMUG’s outdoor recreation opportunities are an economic powerhouse that makes these communities a prime tourism destination and an amazing place to live, work, and raise families.

This trend is growing. As cited in Outdoor Alliance’s Assessment comments, the top reasons people choose to live in Colorado are the state’s clean environment, access to public lands and outdoor recreation opportunities, and residents’ ability to maintain a healthy outdoor lifestyle³.

The result is evident in Outdoor Alliance’s economic impact report,⁴ which found that human-powered recreation, including rock climbing, mountain biking, hiking, paddling, and snow sports, contributes \$392 million annually to the GMUG area.

³ Colorado College, *Conservation in the West Poll* (2015).

⁴Outdoor Alliance. (2019). *GMUG Economic Reports — Outdoor Alliance*. [online] Available at: <https://www.outdooralliance.org/gmug-economic-reports> [Accessed 13 Sep. 2019].

Failing to recognize this trend and its impact on the areas adjacent to the GMUG in the Draft Plan would be a major oversight.

In addition to these overarching comments, please consider the following specific feedback:

CHAPTER 1—FORESTWIDE DIRECTION

Forest Plan Vision, Roles, and Contributions (pages 8-9) - All types of human-powered paddling should be recognized. On Page 8, the Working Draft references rafting and kayaking as popular recreation activities. While this is unquestionably true, plan direction should acknowledge all types of boating, including rafting, kayaking, canoeing, and stand up paddleboarding. Paddleboarding has become vastly more popular in the last decade, and it is important to recognize that different river segments support different types of paddling.

Commodity Use and Community Connections (page 9) – The economic impact of recreation should be listed in this enumerated list. As noted above, Outdoor Alliance’s economic impact report found that human-powered recreation contributes \$392 million annually to the GMUG area.

Partnerships and Coordination (PART) (page 10) – We believe that coordination with local, state, and national partners is essential to successfully managing the national forest. While we appreciate that the GMUG has identified desired conditions related to Partnerships and Coordination, the forest plan should include at least one objective or goal associated with partnership desired condition (e.g. hire a partnership coordinator within a specific timeframe), unless the GMUG already has, and will retain, a partnership coordinator.

Educational and Interpretive Programs (EDU) (page 10) – While we are supportive of the Desired Condition listed in the Working Draft Plan (FW-DC-EDU-01), this is an example of where other plan components are needed to ensure the revised forest plan is a useful document that provides actual guidance and direction for future forest managers. For example, while it is good to aspire to having educational and interpretive programs and activities that enrich visitor experience and understanding of the natural resources on the Forests and their role in providing valued ecosystem services, the Draft Plan should also provide some direction on how this might occur. Campgrounds are an excellent opportunity to reach and educate the public, and many of our members have fond memories of attending Forest Service ranger talks as children. Please include a goal that campground concessionaires receive training in some way to provide interpretive programs (equivalent of ranger talks).

Riparian Management Zones and Groundwater-Dependent Ecosystems

(RMGD) (pages 16-20) – Providing clean water is one of the core functions of a National Forest, and riparian management is of acute concern, not only to our members who enjoy and participate in paddle sports, but to all who depend upon water coming from the GMUG. We suggest modifying FW-GDL-RMGD-09 to read “To maintain stream thermal cover and prevent windthrow within the riparian management zone, clear-cut harvest should not occur in riparian management zones *and the Forest Service should consider prohibiting any form of timber harvesting that could negatively impact the riparian area and river corridor.*” We also suggest amending FW-GDL-RMGD-11 to read “New water diversions and impoundments should be located and constructed such that their location and operation has the minimal impact on the structure, function, composition, and connectivity of riparian management zones *and ensure stream connectivity and safe passage for paddling.* For example, low head dams should include boat chutes and there should be proper signage warning paddlers of dangerous diversion structures. These minor changes in how the Forest Service approaches water diversions and impoundments will ensure smooth integration of recreation management with other riparian management and water uses.

Aquatic Ecosystems (AQTC) (pages 20-21) – Recreationists have a strong interest in helping to maintain healthy aquatic ecosystems. Aquatic ecosystem management particularly pertains to boaters and other paddlesport enthusiasts, whose activities place them squarely within aquatic ecosystems. We suggest adding an additional Guideline to this section:

- FW-GDL-AQTC-10: Where possible, the Forest Service and other stakeholders should coordinate with recreation users to provide flows that can support both the environment and recreation.

On river segments where there are recreation opportunities, it is critical that both environmental and recreational values are supported simultaneously and that multi-purpose projects that support aquatic ecosystems and recreation are prioritized.

Furthermore, we ask that the Forest Service consider the desires and safety of recreation users when implementing FW-GDL-AQTC-07. A critical decision-making process is needed when determining when to remove large wood from streams. There are several considerations to be assessed when removing large woody debris

for recreational safety. The ecological benefits of large woody debris should be weighed against the threat posed to recreationists.⁵

Canada Lynx (Federally Threatened) (pages 32-33) – Winter recreationists in Colorado recently participated in a groundbreaking study concerning the impacts of winter recreation on Canada Lynx.⁶ The high level of participation in this study speaks to the great interest that winter recreationists have in lynx conservation. FW-GDL-SPEC-53, states, “...no net increase in snow compaction at the scale of each lynx analysis unit.” While we support the general idea behind this guideline, it would be stronger if it explained what the current baseline is that “no net increase” will be measured against. For instance, the Flathead National Forest Land and Resource Management Plan references, “The ‘no net increase’ is in comparison to the suitability displayed in figure B-11.”⁷ The GMUG should similarly provide a baseline from which to measure “no net increase.”

Watersheds and Water Resources (WTR) (pages 34-35) - Non-consumptive water uses rely just as heavily as consumptive uses on healthy watersheds. For this reason, we ask that the GMUG change FW-DC-WTR-02 to read “The Forest Service and stakeholders should actively coordinate in sustaining ecological and hydrologic processes to continue to provide critical water supplies to communities and water users *and maintain healthy watersheds for the environment and recreation.*” In addition, please add a Standard or other plan component to ensure watershed restoration projects do not conflict with boating access and use, and where necessary, that specific trails and parking lots should be established to reduce environmental impact while preserving recreational access.

Continental Divide National Scenic Trail (DTRL) (pages 36-38) – Outdoor recreationists, especially hikers, mountain bikers, skiers, and snowshoers, highly value the Continental Divide National Scenic Trail and are highly invested in its management. We appreciate that FW-DC-DTRL-01 references “and other compatible non-motorized trail activities;” however, these should be enumerated (e.g. “such as mountain biking”). Likewise, the language in FW-GDL-DTRL-10, “To promote high-quality scenic, primitive hiking and horseback riding opportunities...” excludes other compatible uses. Consider replacing with, “To promote high-quality scenic, primitive recreation opportunities...”. Finally, we ask that the GMUG add a guideline for new trail segments to be managed under the primitive or semi-

⁵ https://www.americanwhitewater.org/content/Wiki/stewardship:woody_debris

⁶ See USFS Rocky Mountain Research Station “Science You Can Use: Winter sports and wildlife: Can Canada lynx and winter recreation share the same slope?” for more information about this study:

<https://www.fs.fed.us/rmrs/winter-sports-and-wildlife-can-canada-lynx-and-winter-recreation-share-same-slope>

⁷ Flathead Forest Plan FW-GDL-REC 03, page 61



primitive ROS. We suggest: "To retain or promote the character for which the trail was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing Primitive or Semi-Primitive Non-Motorized Recreation Opportunity Spectrum classes. Road and motorized trail crossings and other signs of modern development should be avoided to the extent possible."

Leasable Minerals and Energy Resources including Oil and Gas, Coal, Geothermal, and Others (ENMI) (page 40) – More so than most National Forests, the GMUG has the potential for conflict between leasable minerals and energy resources and outdoor recreation. This is due to both the mineral potential on the forest and the amount of recreation use the forest receives. In order to manage and minimize this potential conflict, the plan should include a standard, or other plan component requiring the consideration of impacts to recreation when developing leasable minerals.

Lands and Special Uses (LSU) (pages 42-43) - Throughout the GMUG National Forests there are complex property boundaries between the USFS, BLM, and private property owners. These property boundaries often exist in or near river corridors and trail systems, complicating access to rivers and trails in some areas. Where these boundaries intersect with both water-based and land-based recreation opportunities, the Forest Service should work closely with the BLM and with private property owners to preserve and improve access to sustainable recreation, while respecting private property rights and existing grazing rights. We cover this topic in more detail in the Policy Recommendations section of the Outdoor Alliance GMUG Vision. To this end, FW-GDL-LSU-05 should be changed to read "... Improves access for recreationists including hunting, fishing, *paddling*, and trail users." Access to paddling opportunities on public lands is a priority for many local residents and visitors to the GMUG, and river access trails and roadways should be preserved and enhanced where possible.

Range (RNG) (pages 44-46) – Outdoor recreation often occurs in the same landscapes as grazing and range management. While these uses can successfully coexist on the forest, education is needed to ensure all user groups (outdoor recreationists and ranchers) understand each other's activities and uses on the forest. The plan should include plan components to help reduce conflict between recreation and grazing through educational programming. For example, we suggest the following:

- FW-DC-RNG: The grazing program is managed in harmony with recreation and other uses on the forests.

- FW-GDL-RNG: Work with recreation user groups to educate the public about the grazing program, work with permit holders to relocate stock facilities outside of high use recreation areas.

Recreation (REC) (pages 46-48) – We appreciate that the recreation section of the Working Draft Plan includes a high level of detail. For example, FW-STND-REC-06 and FW-STND-REC-07 have excellent detail and should be modeled across the Forest Plan. Furthermore, we applaud the GMUG for integrating recreation with other forest activities through FW-DC-REC-01 & FW-DC-REC-02. This integration is an important element of the 2012 Planning Rule. In addition to these two desired conditions, however, we suggest three additional Desired Conditions for recreation management on the GMUG, as well as a related Goal:

- FW-DC-REC: Recreation settings retain their natural character and continue to contribute to a sense of adventure for visitors as development and populations in the region continue to grow and new forms of recreation emerge.
- FW-DC-REC: Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.
- FW-DC-REC: Visitation and recreation activities do not significantly diminish wildlife habitat values or negatively impact wildlife populations.
- FW-GOAL-REC: Impacts from recreation will be carefully monitored and managed to ensure that human activities and recreation infrastructure are balanced with resource conservation and other forest uses.

These desired conditions and goal will help to ensure that the GMUG continues to provide high quality settings and opportunities for outdoor recreation over the life of the plan. Equally important, these plan components will help the Forest Service to manage outdoor recreation and ensure that recreation uses do not significantly impact the GMUG's wildlife populations. Healthy and abundant wildlife populations enrich outdoor recreation experiences and contribute to the unique settings and experiences found on the GMUG. However, the GMUG is a large and diverse forest, and management to address human/wildlife conflict will necessarily need to be tailored to address the specific issues and needs of different parts of the forest. The revised forest plan should allow for flexibility. For example, we suggest that FW-GDL-REC-11, regarding food storage, using "may" instead of "should".

The GMUG plan must contain Standards that will help the Forests reach the desired conditions expressed in FW-DC-REC-01 and 02, as well as the desired conditions we've suggested above. We suggest the following:

- FW-STND-REC: Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.
- FW-STND-REC: When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.
- FW-STND-REC: Management for recreation should include measures to prevent ecological impact. This could include providing concentrated infrastructure that encourages sustainable recreation practices. Protection of ecological conditions is vitally important to recreation users. Standards should emphasize balance between recreation use and ecological impacts.

Recreation Opportunity Spectrum

Many factors influence why recreationists are drawn to particular areas of the forest. Natural features such as mountains, cliff faces, and navigable waterways are important. So too are topographic and climate conditions that lead to ample winter snows in one area and dry trails for early season riding in another. The Recreation Opportunity Spectrum (ROS), however, is an important tool for managing use and development, and setting user expectations across the forest. As far as forest plan components go, the ROS is among the most important elements of the plan for determining how the public will experience the forest in the future. For these reasons, we take a particular interest in how the Working Draft Plan approaches the ROS.

The revised forest plan should include plan components to help guide the GMUG towards achieving its desired ROS. These could include objectives to address removal of unauthorized motorized routes in non-motorized settings and to initiate winter travel management planning to designate routes and areas for winter motorized use. Currently, the Working Draft Plan is missing two important standards, which we ask the Forest Service to include in future versions of the GMUG forest plan:

- FW-STND-REC: Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.



- FW-STND-REC: Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.

Additionally, FW-GDL-REC-10 would be better located under Standards, replacing “should” with “shall”.

We appreciate that the Working Draft Plan includes a table (Table 6) describing the ROS setting descriptions and site modifications. However, the GMUG could improve upon its use of the ROS in the forest plan by improving upon this table. ROS is the tool for integrating various elements of the forest plan, and this table should explicitly integrate other elements beyond recreation. For instance, this table should integrate direction regarding what kind of fire/fuels treatments or grazing management regimes fit in with what ROS settings, in addition to the recreation elements already included in the ROS table. The section Scenery (SCNY) has good integration language which could be modeled in the ROS table.

Table 6 should also be broken into separate summer and winter tables or columns so that the winter ROS is clearly detailed. By combining the summer and winter ROS classifications into one table and set of descriptions, the GMUG has missed an opportunity to truly differentiate between different desired conditions for recreation in these very different seasons. Both the Flathead and Custer Gallatin National Forests use separate ROS classifications, and we recommend reviewing these early adopters of the 2012 Planning Rule. We recommend creating an additional stand-alone classification table for winter recreation in order to better address unique winter recreation issues. Issues like signage, snow grooming, and backcountry huts are just a few of the settings which have unique needs in winter that are different than summer and may fit into the ROS classifications differently. For example, the presence of primitive winter hut access in semi-primitive non-motorized settings should be appropriate in winter ROS settings, but semi-primitive non-motorized winter ROS settings should not include groomed routes.

Table 6 should clarify that motorized ROS settings (rural, roaded natural, semi-primitive motorized) do not automatically designate the entire area for motorized use and that areas within this setting will be set aside for non-motorized recreation. Groomed ski trails and many other front-country areas popular with non-motorized recreationists often fall under these settings.

The Recreation section of the plan should also include suitability components beyond the Recreation Opportunity Spectrum. Additional suitability components



should address suitability of various non-motorized recreation uses and activities. We request that the GMUG revised forest plan include additional Suitability Components which would specify the following:

- Foot travel, including skiing, is suitable for cross-country travel unless area is administratively closed to public access.
- Non-motorized boating, wading, and swimming is suitable on all water bodies, rivers, and stream reaches, unless area is administratively closed to public access.
- Rock climbing is a suitable wilderness and non-wilderness activity, as is the conditional use of fixed climbing anchors as appropriate.

Trails

Of the many important recreation resources on the GMUG, trails may be the most visible and universally appreciated. We appreciate that FW-Obj-REC-04 calls for “Maintain[ing] 500 miles of trails...” but it would be helpful to know what percentage of total trail mileage this is in order to understand how ambitious, and realistic, this objective is. We also wonder how this objective is affected as new trails are constructed. Rather than the plan including an objective to maintain a set number of miles of trail, we urge the GMUG to consider using a percentage that adjusts as the trail network changes over time.

We are concerned about the implications that FW-GDL-REC-09 has for the paddling community. It should be modified to allow for trails that provide access to rivers for paddling purposes where necessary. Foot traffic should be encouraged to use primary trails instead of dispersed unofficial trails in this context. These primary trails should be properly maintained so people are more inclined to use them. We propose that the GMUG include an additional objective along these lines, to enhance river access:

- FW-Obj-REC: Improve access areas to river recreation where necessary.

Travel Management Planning

Outdoor recreation on the GMUG National Forests is year-round. Winter sports such as backcountry skiing, cross country skiing, snowshoeing, and snowmobiling are very popular on the forest. In some areas of the forest, conflict between these uses is growing as more people engage in backcountry recreation each year and new technologies allow people to travel further into the backcountry, faster. The 2015 Over Snow Vehicle(OSV) Rule requires that all national forests that receive sufficient snow to support winter recreation undergo over-snow vehicle (winter)

travel management planning and publish an OSV use map showing areas and trails designated for OSV use. Once winter travel planning is completed, OSV use outside of the designated system is prohibited.

Although winter travel planning is a separate process from forest plan revision, the GMUG can, and should, include elements in the revised forest plan that will guide future travel planning. These include a winter-specific Recreation Opportunity Spectrum and plan components that provide forest-wide direction related to winter travel management. For example, the draft plan should set a timeline of one year for the initiation of winter travel planning across the forest. For more winter travel management recommendations, please refer to the “Policy Recommendations” in the *Outdoor Alliance GMUG Vision* previously provided to the GMUG Planning Team.

Travel management is a year-round concern. We appreciate that FW-STND-REC-05 restricts motorized and mechanized use to designated system routes. This standard should also include a reference to the plan glossary so that readers are clear on the definition of motor vehicles. We encourage the GMUG to consider additional direction around the management of Class 1 electric assist mountain bikes (eMTBs). We support managing Class 1 eMTBs independently from traditional mountain bikes *and* independently from other motor vehicles. We suggest that the revised forest plan include direction for the forest to designate motorized routes specifically for eMTBs.

Monitoring

Monitoring is an important and ongoing step in the forest planning process. It helps the Forest Service to ensure that forest management is in line with revised forest plan direction and that the forest is trending towards the desired conditions outlined in the plan. We are supportive of the monitoring questions and indicators included in Table 9 of the Working Draft Plan, but would like to see additional monitoring objectives, questions, and indicators specific to recreation. For example, complying with FW-STND-REC-06 requires specific information that the monitoring questions in the current Working Draft Plan will not provide. We suggest adding an additional monitoring-focused recreation objective to “Annually complete dispersed campsite monitoring on 20% of known dispersed camping areas across the forest”, with the goal of collecting metrics for FW-STND-REC-06. Likewise, we suggest adding another objective to “Annually complete visitor satisfaction surveys and visitor use monitoring” with the goal of collecting metrics for FW-STND-REC-07. Finally, in order to focus trail maintenance efforts, we suggest one additional monitoring-focused recreation objective: “Annually, complete condition surveys on at least 20% of trails to inform and prioritize future maintenance.”

These objectives will in turn require specific monitoring questions, indicators, and adaptive management actions added to Table 9.

Scenery (SCNY) (page 51) – The GMUG contains some of the most impressive scenery in Colorado, and indeed in the entire National Forest system. We support FW-OBJ-SCNY-02, and projects to remove unnecessary fencing that conflict with recreational trail and river access should be prioritized under this objective.

Timber and Other Forest Products (TMBR) (pages 52-54) – Timber is an important program within GMUG forest management and one that can have unintended consequences for recreation. Timber projects that do not consider, much less minimize, impacts to recreation resources are a concern for us and our members. Therefore, we would like to see additional plan direction under the TMBR heading that will help to head off unnecessary conflicts between vegetation management and outdoor recreation. In areas within the suitable timber base, recreation resources and experiences should be integrated, protected, and restored. To better integrate timber management direction with recreation we suggest the following additional plan components:

- FW-DC-TMBR: Vegetation management complements the recreational setting over the long term.
- FW-GDL-TMBR: To reduce the likelihood of establishing unplanned new visitor use patterns, temporary roads, skid trails, and landings should be constructed and rehabilitated to discourage new visitor use of that structure.

Furthermore, FW-STND-TMBR-05, should be modified so that timber harvest shall be prohibited in areas where watershed conditions may be irreversibly damaged or even significantly damaged for a prolonged period of time.

Eligible Wild and Scenic Rivers (WSR) (page 55) – We agree with the guidance outlined on Working Draft page 2 that states “(If any) Recommendations to Congress for lands... and the identification of rivers eligible for inclusion in the National Wild and Scenic River System... “. The 2012 Planning Rule does not require or encourage a Suitability Study to be completed as part of the Forest Planning process, and we ask the Forest Service to focus solely on producing a robust Eligibility Inventory.

CHAPTER 3: MANAGEMENT AREA DIRECTION

Wilderness (WLDN) (pages 58-59) – Wilderness areas are highly valued by outdoor recreationists in all seasons. On the GMUG, Wilderness areas provide opportunities for world-class hiking, skiing, climbing, paddling, and more. These areas are extremely popular, but this popularity can come at a cost. To ensure that outdoor recreation does not degrade Wilderness character, the revised forest plan should include at least one monitoring objective. For example, we suggest:

- MA-OBJ-WLDN: The forest will conduct Wilderness character monitoring at least once every 5 years.

As with the monitoring objectives we suggest in the Recreation section above, this objective should be paired with monitoring questions, indicators, and adaptive management in Table 9.

Special Interest Areas (SIA) (pages 59-60) - Where Special Interest Areas are established and overlap with paddling opportunities, paddling should be identified as a use allowed and supported within the Special Interest Area (e.g., East River in the proposed Gunnison Research SIA). Paddling is a low-impact form of “sustainable recreation,” and is compatible with scientific research and monitoring, other types of recreation, and many other uses that are managed through Special Interest Areas.

Recreation Emphasis Management Areas (MA 4) (pages 61-64) – We are pleased to see that the Working Draft Plan recognizes and prescribes unique management for the areas of the forest that receive exceptionally high recreation use. From developed ski areas to popular dispersed camping areas to beloved rivers, these areas require special management attention so that we do not “love these areas to death”.

High-Use Recreation Areas - MA 4.2 (HIREC)

Plan components associated with High Use Recreation Areas are excellent and are a good example of how detailed plan components for all management areas/sections of the plan should be developed. The proposed High-Use Recreation Areas encompass multiple river segments that have high-quality paddling opportunities in the Gunnison National Forest, including Daisy Creek, Slate River, and the Taylor River above and below Taylor Park Reservoir. Proposed management of High-Use Recreation Areas should stay consistent with existing

and/or desired conditions for paddling. The same holds true for other activities which are common across High-Use Recreation Areas, such as hiking, mountain biking, and backcountry skiing.

While we are supportive of MA-GDL-HIREC-03, we would like to note that official parking areas and access trails, where needed, will improve the recreational experience and reduce negative environmental impact. It may be necessary to increase or improve parking opportunities to protect forest resources and recreation experiences. In many areas (e.g., Slate River, Daisy Creek, Upper Taylor River, etc.) parking opportunities for river access points need to be improved, rather than further restricted. This should be taken into consideration when implementing management controls. Many access locations within the river corridor provide a semi-primitive experience enjoyed by many visitors. Where it does not detract from the recreational experience, development at these locations should be minimal. Improved high-use river access points will encourage concentration of users at appropriate areas and better prevent impacts on more sensitive locations.

River corridors are essential to on-water river recreation, such as paddling; however, they provide valuable experiences to a wide range of visitors. Concentrated and varied use areas within river corridors should be provided to offer a range of experiences and to ensure impacts outside of developed access points can be managed.

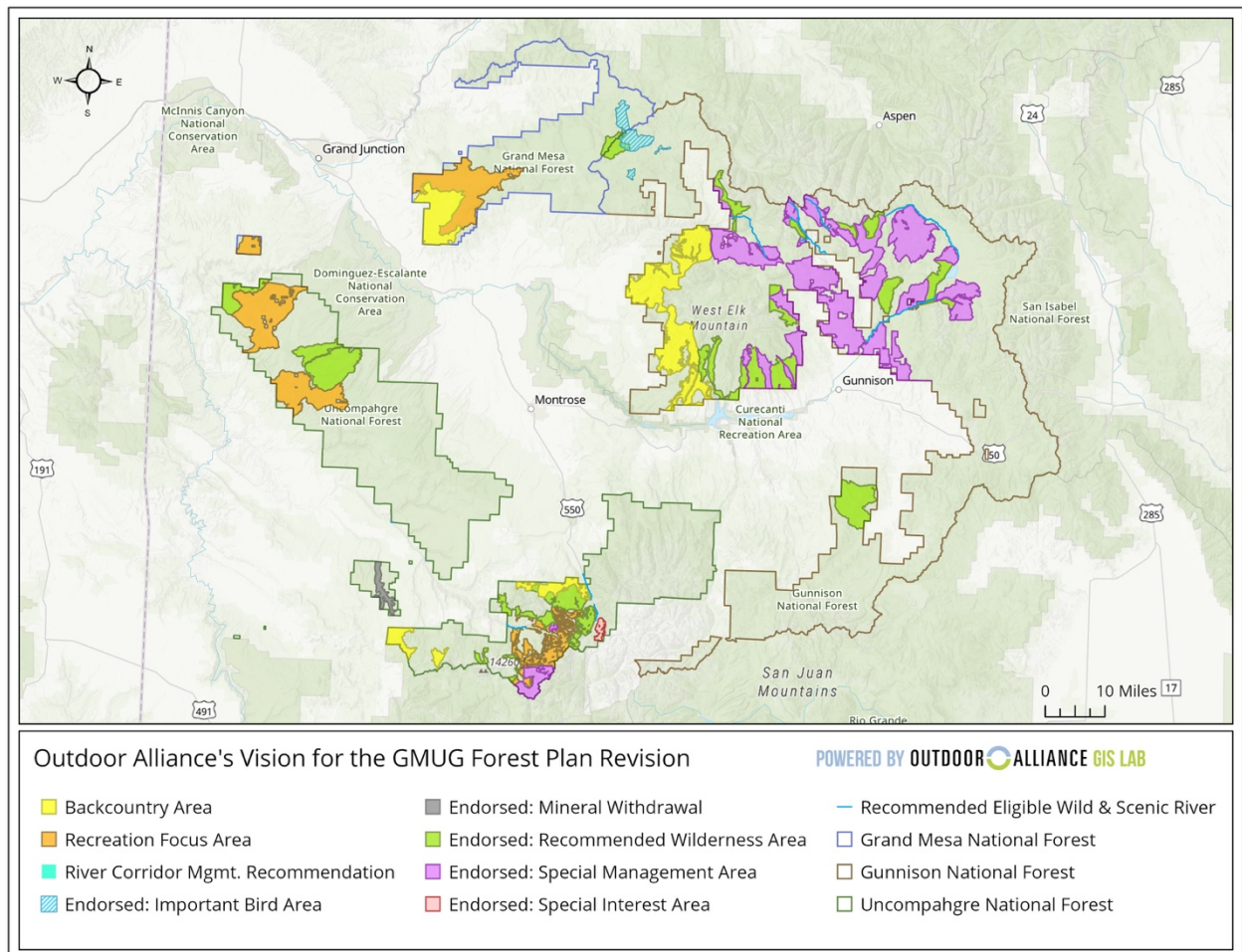
Appendix 7: Priority Watersheds (pages 169-170) – Restoration projects identified for Priority Watersheds should be evaluated against their impacts on recreational paddling opportunities. Integrating recreational goals and safety into projects can foster public support for projects, encourage recreational use and stewardship, and reduce the likelihood of avoidable accidents.⁸

Section 2 – Comparison of the Outdoor Alliance GMUG Vision and GMUG Working Draft Forest Plan

In the second section of our feedback, we offer a geospatial analysis comparing the *Outdoor Alliance GMUG Vision* to the Working Draft Plan. The OAGV is a blueprint, with a high level of specificity, for world-class sustainable recreation in the Grand

⁸ See, Colburn, Kevin. "Integrating Recreational Boating Considerations into Stream Channel Modification and Design Projects." *www.americanwhitewater.org*, 11 Mar. 2012, www.americanwhitewater.org/content/Document/view/documentid/1006/.

Mesa, Uncompahgre, and Gunnison (GMUG) National Forests (an overview of these recommendations is shown in the following map). In our analysis, we found that backcountry and recreation focus areas in the OAGV have a high degree of overlap with General Forest Management Areas in the Working Draft Plan (Kannah Creek and Turkey Flats/Pinon Mesa being the exceptions). These findings are important because backcountry areas allow for management of lands with high conservation value and established recreation uses that make Wilderness recommendation inappropriate, and recreation focus areas address specific places where many different recreational uses are concentrated or provide premier opportunities for a single activity. The Forest Service should review General Forest Management Areas more closely and consider adopting both backcountry and recreation focus area designations where appropriate.



The table below summarizes designated areas unique to the OAGV compared to GMUG Working Draft Plan Management Areas, and is represented as the percent

overlap of the OAGV with the Working Draft Plan Management Areas (only overlapping management areas were included in table).

Outdoor Alliance GMUG Vision (OAGV)			OAGV compared to GMUG Working Draft Plan (% match)					
Designation Name	Proposed Designation	Acres	Roadless Area	General Forest	High-Use Rec Area	Special Interest Area	Wildlife Mgmt Area	Wildlife Mgmt/ Roadless Area
Kannah Creek	Backcountry Area	31,328						100%
West Elk	Backcountry Area	90,613	73%	23%			4%	
Beaver Park	Backcountry Area	2,763		100%				
Lone Cone	Backcountry Area	7,536		100%				
Ouray	Backcountry Area	11,264	28%	71%	1%			
Mesa Top	Recreation Focus Area	50,960		77%	16%			6%
Turkey Flats/ Pinon Mesa	Recreation Focus Area	6,465		8%	92%			
Telluride	Recreation Focus Area	30,310	1%	91%	6%	2%		
Uncompahgre Plateau North	Recreation Focus Area	46,587	16%	61%			3%	20%
Uncompahgre Plateau South	Recreation Focus Area	31,814	38%	62%				

Backcountry Areas

There are areas in the GMUG that are valued for both human-powered recreation and conservation and require more flexible management than under Recommended Wilderness, particularly to maintain mountain biking and other recreational opportunities. There are two areas in particular where it is essential that access to high-quality mountain biking opportunities be preserved: Kannah Creek and West Elk. We strongly support a non-motorized Backcountry Area designation for these areas and management that seeks to emphasize wildlife conservation alongside recreation uses.

Kannah Creek Backcountry Area

The Kannah Creek watershed is the principal source for the City of Grand Junction’s municipal water supply, an important calving area for elk, recognized as an area with Very High Biodiversity Significance, and a source for outstanding recreation opportunities for mountain bikers, hikers, and equestrians. Protection of watershed



health, wildlife management, and outdoor recreation opportunities can coexist, but careful planning and monitoring are warranted to manage this area. For these reasons, we believe that Kannah Creek should be a non-motorized Backcountry Area with specific management direction:

- Visitation and recreation activities do not significantly diminish wildlife habitat values or negatively impact wildlife populations.
- Support and plan for watershed protection within the Kannah Creek drainage through existing trail improvements and maintenance and planned human-powered trail development.
- We agree with the Citizens' Conservation Proposal that Kannah Creek should be found unsuitable for oil and gas leasing and mineral material sales. The area also needs to be withdrawn from mineral entry.
- The southeast corner of the Kannah Creek Backcountry Area is mapped as winter semi-primitive motorized in the Working Draft Plan. This winter ROS setting conflicts with primitive recreation values and the proposed Wildlife Management Area. We recommend changing this ROS setting to winter semi-primitive non-motorized.

West Elk Backcountry Area

The OAGV recommendation for this backcountry area extends beyond the Colorado Roadless Area Boundary (MA 3.1) into General Forest (MA5) in the Working Draft Plan. We recommend adopting the backcountry area designation and boundary alignment as described within the OAGV. We support the summer ROS settings as mapped in the Working Draft Plan for this area. The winter ROS setting for this area is mostly semi-primitive motorized (82%) with a small amount of semi-primitive non-motorized area. We recommend that the entire Backcountry Area be mapped as winter semi-primitive non-motorized.

Beaver Park Backcountry Area

The Working Draft Plan proposes to manage this area as General Forest (MA 5), but this would not protect any of the recreation or resource values in this area. We recommend that this area be designated as a Backcountry Area as described in the OAGV. We support the summer ROS settings for this area in the Working Draft Plan, but we are concerned with the winter ROS setting of semi-primitive motorized. This area is popular with non-motorized recreationists, and we recommend a semi-primitive non-motorized winter ROS setting for this area.

Lone Cone Backcountry Area

The Working Draft Plan proposes to manage this area as General Forest (MA 5), but this would not protect any of the recreation or resource values in this area. We recommend this area be designated as a Backcountry Area, as described in the OAGV. We are supportive of the summer ROS settings for this area in the Working Draft Plan, but we are concerned with the winter ROS setting of semi-primitive motorized. This area contains significant natural resource values and backcountry skiing opportunities, and we recommend a semi-primitive non-motorized winter ROS setting for this area.

Ouray Backcountry Area

The Working Draft Plan primarily classifies this area as General Forest (MA 5) and Colorado Roadless, with a small amount of High Use Recreation Area along County Road 7. To protect recreation values and wildlife habitat, we recommend adopting the Backcountry Area designation and boundary alignment as described in the OAGV. While the summer ROS settings of roaded natural along CR 7 and semi-primitive motorized along CR 5 and CR 9 are not precisely in alignment with the OAGV, the approach in the draft plan appears reasonable. We are pleased to see that most of this area in the Working Draft Plan is mapped as a summer ROS setting of semi-primitive non-motorized. The winter ROS setting of semi-primitive motorized does not align with the significant backcountry skiing opportunities and quiet use backcountry huts in this area. Mapping this area as suitable for winter motorized use also poses significant concerns with Wilderness boundary encroachment. We recommend a winter ROS setting of semi-primitive non-motorized adjacent to existing and potential Wilderness areas, as well as around backcountry huts.

Recreation Focus Areas

We are very supportive of the Recreation Focus Area (RFA) concept as a management tool. Designating RFAs is a way for the forest plan to address specific areas where many different recreational uses are concentrated. An RFA designation is also appropriate for those places that provide premier opportunities for a single activity (such as a popular climbing area or ski resort). We are pleased to see the Working Draft Plan highlight High Use Recreation Areas, but there are several areas in the GMUG that receive more visitors than other areas of the forest and require special management direction to ensure that recreation within these areas is sustainable for the public to enjoy specific recreation opportunities and so that recreation uses do not degrade the natural environment.



Mesa Top Recreation Focus Area

A small portion of this area is designated as a High Use Recreation Area (MA 4.2) in the Working Draft Plan, and while the highway serves as an access point, significant amounts of both motorized and non-motorized recreation extend from trailheads along the highway and the network of forest roads across the mesa. The High Use Recreation Area should extend well beyond the highway corridor, as proposed in the OAGV, to help manage the growing demand for recreation from residents in the Grand Junction area and visitors alike.

The winter ROS setting in the Working Draft Plan includes a roaded natural setting for the Land's End Loop snowmobile trail and a large semi-primitive motorized setting for the southeastern portion of this area. However, this area is also a popular Nordic skiing and snowshoeing area, and we recommend that additional areas be preserved as semi-primitive non-motorized to protect winter recreation opportunities, as well as wildlife habitat on the Mesa.

Turkey Flats / Pinon Mesa Recreation Focus Area

The Turkey Flats/Pinon Mesa Recreation Focus Area is highly aligned with the High Use Recreation Area (MA 4.2) proposed in the Working Draft Plan, and we support this management area designation. We also support both the summer and winter ROS settings in the Working Draft Plan for this area.

Telluride Recreation Focus Area

The Working Draft Plan proposes to manage this area as General Forest (MA 5), but this would not protect the recreation resources highlighted in the OAGV. The Forest Service should designate this area as a High Use Recreation Area because of its close proximity to Telluride, its high concentration of recreation, and the high-density of visitor use. The summer ROS setting in the Working Draft Plan for the majority of this area is semi-primitive non-motorized, which we support. We are also pleased to see the winter ROS setting of semi-primitive non-motorized in the majority of the Telluride Recreation Focus Area. This designation is especially important throughout the Ophir valley, where backcountry skiing is popular. However, we would like to see additional semi-primitive non-motorized settings around Priest Lake.

Uncompahgre Plateau North Recreation Focus Area

The Working Draft Plan proposes to manage this area as General Forest (MA 5), Roadless (MA 3.1) and Wildlife Management Area (MA 3.2), but the majority of the

area designated as General Forest (61%) would not protect the recreation and natural resource values on this landscape. The summer ROS setting in the Working Draft Plan is primarily semi-primitive motorized to allow for existing motorcycle trails, but does protect a few core areas for quiet recreation. Along the west side of the plateau, we recommend a semi-primitive non-motorized setting.

Uncompahgre South Recreation Focus Area

The Working Draft Plan proposes to manage this area as General Forest (MA 5) and Wildlife Management Area (MA 3.2), but the majority of the area designated as General Forest (62%) would not protect the recreation and natural resource values on this landscape.

The summer ROS setting in the Working Draft Plan allows for existing motorcycle trails but does protect a few areas for quiet recreation. Where possible, we recommend extending the semi-primitive non-motorized setting to enhance quiet recreation and connectivity for wildlife. We appreciate the larger tracks of semi-primitive non-motorized winter ROS proposed in the Working Draft Plan. Where possible, we recommend expanding semi-primitive non-motorized settings to enhance quiet winter recreation opportunities and connectivity for wildlife.

Endorsed Proposals and Designated Areas

In the process of seeking out consensus recommendations for the GMUG Forest Plan Revision, the OAGV reviewed various proposals that have been developed by other community groups. These proposals include recommended designated areas on lands that possess outstanding ecological, aesthetic, or scenic qualities and have high-quality recreation opportunities. The OAGV endorses three outside citizens' proposals and seven additional designated area recommendations from separate coalitions. We recommend that all Recommended Wilderness Areas follow a summer and winter ROS setting of primitive. Specifically, the following Recommended Wilderness Areas in the OAGV should align with a primitive setting, including Hayden Mountain, Chalk Mountain, East Cement, Matchless, Dillon Mesa, East Elk Creek, Stubens Creek, Beaver, and Munsey Creek/Erickson Springs. We also have concerns with the winter ROS setting of semi-primitive motorized proposed in the Working Draft Plan for the Poverty Gulch Recommended Wilderness and Special Management Areas. This is an important backcountry skiing area, and we recommend that motorized use be restricted to the road corridor. Finally, we recommend that the Abrams/Brown Special Interest Area be semi-primitive non-motorized to protect the recreation and natural resource values in this area.



Conclusion

There is a high degree of alignment between the GMUG Working Draft Plan and *Outdoor Alliance GMUG Vision*. Outdoor Alliance hopes that this feedback will help the GMUG further incorporate the specific desires of the human-powered recreational users on the GMUG National Forest into the Draft Forest Plan. Outdoor Alliance and Outdoor Alliance Colorado are committed to working as a resource for the planning team, and we look forward to continuing to work with the GMUG National Forest. Please do not hesitate to contact us with any questions.

Best Regards,



Louis Geltman
Policy Director
Outdoor Alliance



Julie Mach
Conservation Director
Colorado Mountain Club



About Outdoor Alliance

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Outdoor Alliance Colorado is a coalition of five member-based organizations representing the state's human-powered outdoor recreation community. The coalition includes Access Fund, Colorado Mountain Club, American Whitewater, Colorado Mountain Bike Association, and the American Alpine Club. The Outdoor Alliance community has the strength of 60 affiliated organizations and 12,000 members within 100 miles of the GMUG forest and represents the broader interests of the millions of Coloradans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our state's public lands, waters, and snowscapes.