

May 1, 2023

Dayle Funka
Acting Gunnison District Ranger
216 N. Colorado St.
Gunnison, CO 81230

Re: North Valley Trails Project EA Comments

Dear Dayle,

High Country Conservation Advocates (HCCA) offers the following comments on the Environmental Assessment (EA) for the proposed Crested Butte Mountain Bike Association (CBMBA) North Valley Trails Project (NVTP). HCCA was founded in 1977 and protects the health and natural beauty of the land, rivers, and wildlife in and around Gunnison County.

HCCA is generally supportive of human-powered recreation as practiced in appropriate areas and subject to appropriate environmental review. Importantly, trails that had been proposed previously by CBMBA that were opposed by HCCA have been removed from the NVTP between initial iterations and the EA. As such, we do not oppose the more limited and sustainable expansion encompassed in Options 1 or 2 of the EA. HCCA acknowledges the hard work undertaken by CBMBA and the Gunnison Ranger District over the years to craft a sustainable proposal, the rigorous community vetting and subsequent project downsizing, and the ongoing commitment of both entities to trail stewardship. We think that the best balance of sustainable recreation and other forest uses and resources would be achieved by accepting the recommendations in CBMBA's April 11, 2023 EA comments.

HCCA's scoping comments offered the following suggestions for the Forest Service to consider: (1) the proposed parallel trails should be located as close to the routes they parallel as possible; (2) seasonal closures of parallel routes that pass through seasonal priority wildlife habitats should be considered and implemented, as should closures during critical ranching operations; (3) the Forest Service should require compensatory mitigation – on a one-to-one ratio – for all new trails approved by this project; (4) consider mechanism to ensure enforcement of off-leash dog rules; (5) don't allow commercial and/or organized group events to utilize the new trail system.

Concerning the first suggestion, the NVTP consists largely of new trails alongside or near existing routes, presenting an opportunity for expanded recreation within or adjacent to the existing recreation impact footprint. Channeling recreation growth into already-impacted areas in close proximity to existing infrastructure is desirable. Trails that had been proposed by CBMBA that were opposed by HCCA – such as the Lily Lake/Splains Gulch to Carbon Creek Trail, Eccher Southern Entrance, Slate River Loop, and Slate River Loop to Slate River – have been removed from the NVTP. These trails – especially the connector to Carbon Creek Trail – would have expanded use and recreational pressure beyond the existing focal area and into sensitive wildlife habitat. Kudos to CBMBA and the agency for listening to the

community and removing these routes. As such, we are comfortable that the recommendations made by CBMBA in their recent EA comments strike a sustainable balance between recreation and other forest uses.

Concerning the second suggestion, we specifically support a seasonal closure for the Upper Upper to Brush Creek Trailhead, and urge the agency to make this happen whichever Option is chosen. It is unclear from the EA whether a seasonal closure is being contemplated across both Options. Please implement a seasonal closure necessary to better protect grazing operations.

Concerning the third suggestion, we appreciate the agency's commitment to decommission 5.8 miles of existing trail. We continue to request a one-to-one ratio for decommissioning.

Concerning the fourth suggestion, while the EA acknowledges our previous comment, it does not address the issue. This is an important issue, especially where there is overlap with grazing operations and/or RMBL research plots.

Concerning the fifth suggestion, it also is not addressed in the EA. We reiterate that the final decision should preclude commercial and/or organized group events on the new trail system to the extent possible.

While HCCA typically opposes new trail construction in the backcountry away from existing infrastructure, this proposal is largely within the existing impact footprint. There has been a community dialogue around CBMBA's proposal for years now; it has been scaled back to a reasonable project, and the expanded backcountry trails that HCCA opposed because of unsustainable resource impacts have been removed from consideration from the NVTP.

Thank you for your consideration.

Matt Reed
Public Lands Director
High Country Conservation Advocates