



March 18, 2024

Submitted Electronically

Grand Mesa, Uncompahgre, and Gunnison National Forests
Gunnison Ranger District
Attn: Dayle Funka
216 N. Colorado St.
Gunnison, CO 81230

Re: Crested Butte Mountain Resort Comments on the North Valley Cattle and Horse Allotments Project

District Ranger Funka:

Crested Butte Mountain Resort (CBMR) respectfully submits these comments on the Proposed Action and Preliminary Alternatives for the North Valley Cattle and Horse Allotments Project (Proposed Action).¹ CBMR submits these comments as the holder of a long-term authorization for the development and operation of ski area recreation facilities on the Gunnison Ranger District of the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests.

CBMR has concerns with the Forest Service proposal to expand the grazing season for the Butte North Allotment. The expanded summer grazing season has the potential to interfere with existing infrastructure and summer operations at CBMR and to create a risk for conflict between cattle and public visitors to CBMR. CBMR requests that:

1. The Forest Service not authorize an expanded grazing season in the Butte North Allotment that includes dates during CBMR's summer operating season.
2. The Forest Service consult with CBMR before authorizing any continued grazing in the Butte North Allotment at existing or expanded levels.

CBMR appreciates its longstanding relationship and partnership with the Forest Service and requests that the Forest Service take these comments under consideration.

¹ Crested Butte, LLC holds the special use permit for Crested Butte Mountain Resort. This letter collectively refers to Crested Butte Mountain Resort and Crested Butte, LLC as "Crested Butte Mountain Resort."

COMMENTS

1. The proposal to expand the grazing season for the Butte North Allotment is inconsistent with and has the potential to interfere with existing infrastructure and operations within CBMR's special use permit boundary.

CBMR operates a four-season ski resort under a long-term ski area special use authorization. The lands within CBMR's special use permit boundary have been designated for developed skiing and recreation under the GMUG Forest Plan for forty years. CBMR and the Forest Service have a longstanding partnership and have worked together over the last four decades to provide high-quality public recreation on the public lands within CBMR's special use permit boundary.

CBMR's special use permit provides that the Forest Service will not "allow others to use the permit area in any way that is [] inconsistent with the holder's rights and privileges under [the] permit."²

CBMR's summer operating season typically runs from the first week in June through the first week in October. CBMR's summer operations are authorized under its special use permit and associated annual operating plan.

CBMR currently operates two lifts during the summer, Silver Queen Express and Red Lady Express, and numerous mountain biking and hiking trails. CBMR also operates a disc golf course and a popular on-mountain restaurant, the Umbrella Bar, that can be accessed via hiking, mountain biking, or car. CBMR's summer operations have grown in popularity over the years. The ski area's hiking and biking trails are popular with visitors to Crested Butte and serve as a recreation staple for the local community. CBMR's summer operations provide thousands of visitors with the opportunity to enjoy the public lands on the GMUG National Forest each season.

The Butte North Allotment overlays the northern portion of the CBMR special use permit boundary.³ The Silver Queen Express and Red Lady Express and the significant majority of CBMR's summer hiking and biking trails are located within the boundaries of the Butte North Allotment.⁴

The Forest Service proposal to authorize grazing from July 15 to July 25 within the Butte North Allotment has the potential to interfere with existing summer operations at CBMR and creates a risk for conflict between cattle and public visitors to CBMR. Mountain bikers, in particular, travel at a high rate of speed, and often around blind corners, presenting a high risk for collision with grazing cattle.

The proposed grazing use during peak summer operations in high visitation and use areas at CBMR is inconsistent with and will interfere with existing summer operations within CBMR's special use permit boundary. Because of this, CBMR requests that the Forest Service not

² CBMR Permit § I.G.

³ Proposed Action at 3.

⁴ Proposed Action, Figure 2; Exhibit 1 (CBMR Summer Trail Map).

authorize an expanded grazing season in the Butte North Allotment that includes dates during CBMR's summer operating season.

2. Existing grazing uses have resulted in damage to CBMR facilities and interference with its operations.

As identified in the Proposed Action, grazing is currently authorized in the Butte North Allotment for a limited season from October 6 to October 20.⁵ Grazing is also authorized on the Gothic Allotment that overlays a portion of the CBMR permit area.

CBMR has worked cooperatively with the grazing permittee on the Gothic Allotment and Butte North Allotment for years. But the existing grazing use within and adjacent to the CBMR permit boundary has not been without incident and has resulted, at times, in damage to CBMR facilities and interference with CBMR operations.

CBMR is often the recipient of phone calls from homeowners in the Prospect development requesting that CBMR remove cattle that have moved through the fence separating the development from the Gothic Allotment. CBMR understands that it is not responsible for addressing these concerns, but the calls create an operational interruption for CBMR and demonstrate the difficulty in keeping cattle confined to approved grazing areas. Grazing cattle from the Gothic Allotment also recently damaged the lift deck for the Prospector lift and grazing cattle in the water spring box at the Paradise Warming Hut, part of the Butte North Allotment, required CBMR to take additional measures to address water quality.

CBMR has concerns with the Forest Service's proposal to expand grazing within the CBMR special use permit boundary as a result of the past incidents of facility damage and operational interference from existing grazing within and adjoining CBMR's permit area.

3. CBMR requests that the Forest Service consult with CBMR before authorizing any continued grazing in the Butte North Allotment at existing or expanded levels.

CBMR's special use permit provides that the Forest Service may not authorize others to use the CBMR permit area without prior "consultation with all parties involved."⁶

CBMR requests that the Forest Service jointly consult with CBMR and the grazing permittee for the Butte North Allotment before proceeding with its analysis and proposal to authorize continued grazing at existing or expanded levels in the Butte North Allotment.

CBMR values its partnership with the Forest Service and relationship with the Butte North grazing permittee. CBMR requests the opportunity to discuss the Forest Service proposal with the relevant parties.

⁵ Proposed Action at 26.

⁶ CBMR Permit § I.G

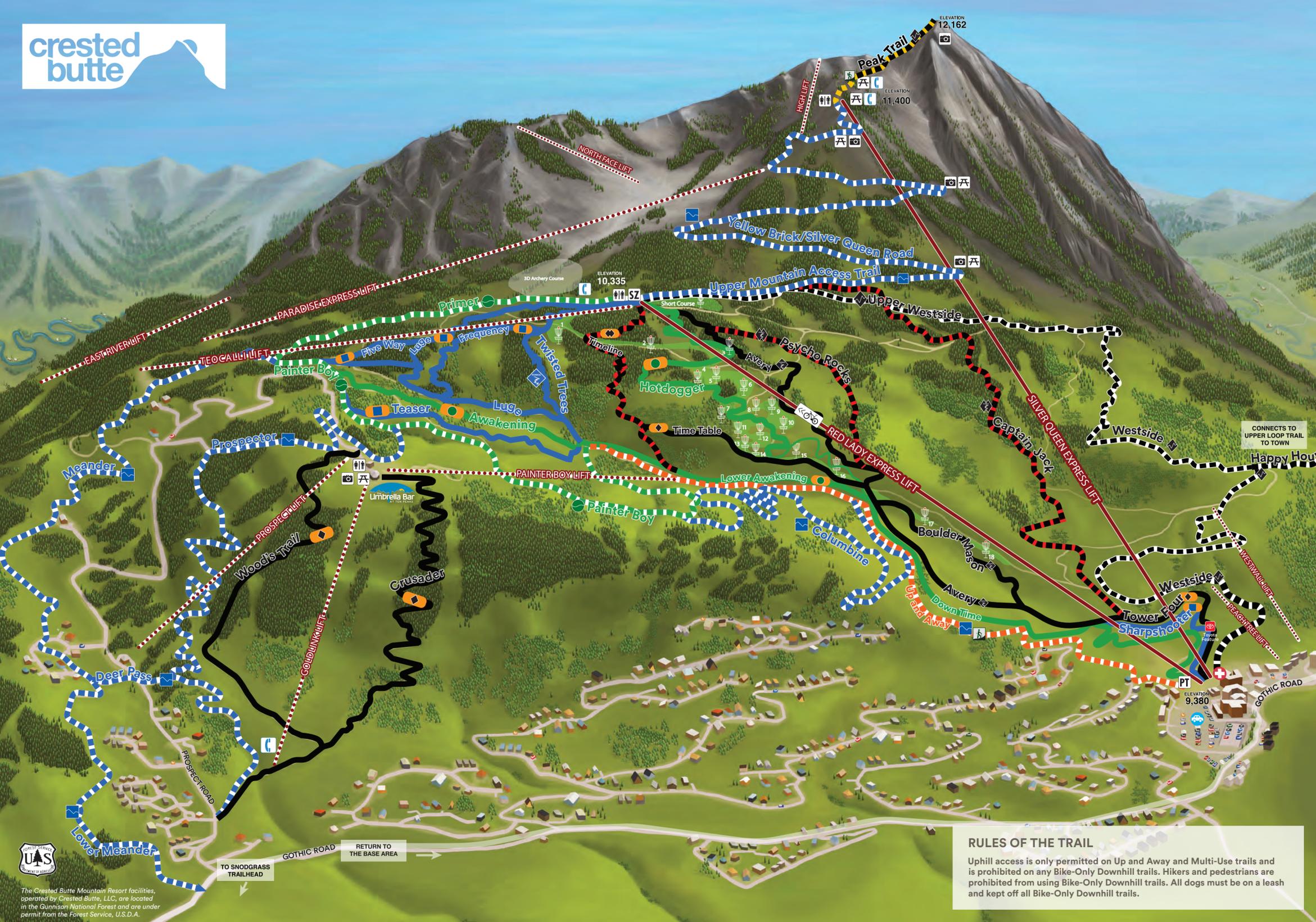
CBMR appreciates the Forest Service taking these comments under consideration and looks forward to working cooperatively with the Forest Service and other stakeholders to address the issues raised in this letter.

Sincerely,

A handwritten signature in cursive script, reading "Tara Schoedinger".

Tara Schoedinger
Vice President & General Manager
Crested Butte Mountain Resort

Exhibit 1



LEGEND

Summit Elevation: 12,162' | Base Elevation: 9,380'
Vertical Drop: 2,775' Lift-Served, 3,062' From Peak

MULTI-USE TRAILS		BIKE ONLY TRAILS	
	MULTI-USE EASIEST		DOWNHILL EASIEST
	MULTI-USE INTERMEDIATE		DOWNHILL INTERMEDIATE
	MULTI-USE ADVANCED		DOWNHILL ADVANCED
	UPHILL BIKE & 2-WAY HIKE		DOWNHILL EXPERT
	HIKING ONLY		DOWNHILL TECHNICAL ADVANCED
	ADVANCED HIKING ONLY		DOWNHILL TECHNICAL EXPERT

	SUMMER LIFT OPEN		SCENIC OVERLOOK
	WINTER LIFT CLOSED		PARKING
	10 - 3 @ CB DISC GOLF COURSE		EMERGENCY PHONE
	PUMP TRACK		CONSTRUCTION ZONE
	PICNIC AREA		BIKE PATROL (970) 349-2236
	RESTROOMS		TOYOTA FEATURE
	SKILLS ZONE		

MOUNTAIN BIKER'S RESPONSIBILITY CODE

Mountain biking involves risk of serious injury or death. Your knowledge, decisions and actions contribute to your safety and that of others.

- STAY IN CONTROL**
You are responsible for avoiding objects and people.
- KNOW YOUR LIMITS**
Ride within your ability. Start small and work your way up.
- PROTECT YOURSELF**
Use an appropriate bike, helmet, and protective equipment.
- INSPECT AND MAINTAIN YOUR EQUIPMENT**
Know your components and their operation prior to riding.
- BE LIFT SMART**
Know how to load, ride and unload safely. Ask if you need help.
- INSPECT THE TRAILS AND FEATURES**
Conditions change constantly; plan and adjust your riding accordingly.
- OBEY SIGNS AND WARNINGS**
Stay on marked trails only. Keep off closed trails and features. Ride in the direction indicated.
- BE VISIBLE**
Do not stop where you obstruct a trail, feature, landing or are not visible.
- LOOK OUT FOR OTHERS**
Look both ways and yield when entering or crossing a road or trail. When overtaking, use caution and yield to those ahead.
- COOPERATE**
If involved in or witness to an incident, identify yourself to staff.

Know and Follow the Code. It is Your Responsibility.

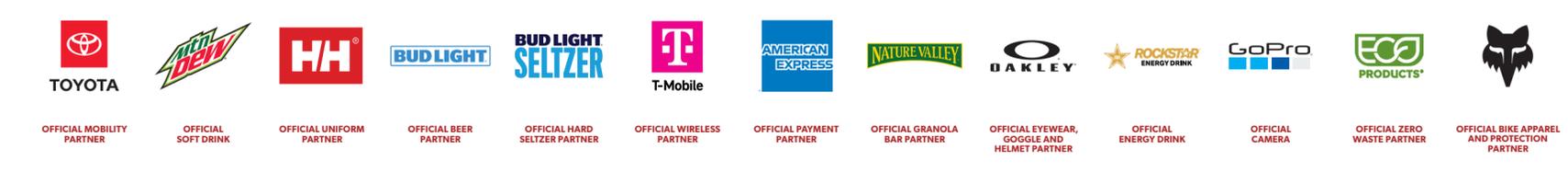
RULES OF THE TRAIL

Uphill access is only permitted on Up and Away and Multi-Use trails and is prohibited on any Bike-Only Downhill trails. Hikers and pedestrians are prohibited from using Bike-Only Downhill trails. All dogs must be on a leash and kept off all Bike-Only Downhill trails.

TRAIL PROGRESSION

<p>Warm It Up Easiest</p> <p>HOTDOGGER, DOWN TIME, PRIMER, PAINTER BOY</p> <p>RIDER TYPE: Novice XC/All Mountain</p> <p>Beginner trails are recommended for new riders to build their skills or experienced riders to warm up for the day. Hotdogger is a fun descent with berms and rollers leading to Down Time and the lift for your next lap. Primer to Painter Boy is a XC-style singletrack that also connects to Down Time. These are the easiest ways down the mountain, but still require the ability to pilot a bicycle over rough terrain.</p>	<p>STEP IT UP Intermediate</p> <p>TEASER, COLUMBINE, LUGE, FREQUENCY</p> <p>RIDER TYPE: Intermediate Downhill, XC/All Mountain</p> <p>Time to pick up the pace! Luge is a gravity-fed descent with some rolling and berming to help you keep your speed. Teaser boasts undulating terrain and jumps to help learn how to get the wheels off the ground. Head toward Columbine for a XC ride through beautiful meadows and forests.</p>	<p>SPEED IT UP Advanced Expert</p> <p>AVERY, TIMELINE, WESTSIDE</p> <p>RIDER TYPE: Expert Downhill, XC/All Mountain</p> <p>Avery is a DH racetrack that has a little bit of everything for the experienced shredder. Roots, rocks, speed and air all present themselves in this super fun ride. Timeline is the most popular trail on the mountain with fast flowing turns and large jump features. Westside is a classic Rocky Mountain XC trail with tight trees, technical rocky sections and fast singletrack.</p>
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OFFICIAL PARTNERS OF CRESTED BUTTE MOUNTAIN RESORT



The Crested Butte Mountain Resort facilities, operated by Crested Butte, LLC, are located in the Gunnison National Forest and are under permit from the Forest Service, U.S.D.A.