Data Submitted (UTC 11): 3/18/2024 6:00:00 AM
First name: Dale
Last name: Ratliff
Organization: Crested Butte Mountain Resort
Title:
Comments: 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[rsquo]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.COMMENTS1. 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[rsquo]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[rsquo]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[rsquo]s special use permit boundary. CBMR[rsquo]s special use permit provides that the Forest Service will not [ldquo]allow others to use the permit area in any way that is [] inconsistent with the holder[rsquo]s rights and privileges under [the] permit.[rdquo](2) CBMR[rsquo]s summer operating season typically runs from the first week in June through the first week in October. CBMR[rsquo]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[rsquo]s summer operations have grown in popularity over the years. The ski area[rsquo]s hiking and biking trails are popular with visitors to Crested Butte and serve as a recreation staple for the local community. CBMR[rsquo]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[rsquo]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[rsquo]s special use permit boundary. Because of this, CBMR requests that the Forest Service not authorize an expanded grazing season in the Butte North Allotment that includes dates during CBMR[rsquo]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[rsquo]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[rsquo]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[rsquo]s special use permit provides that the Forest Service may not authorize others to use the CBMR permit area without prior [ldquo]consultation with all parties involved.[rdquo](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. 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.(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 [ldquo]Crested Butte Mountain Resort.[rdquo](2) CBMR Permit [sect] I.G.(3) Proposed Action at 3.(4) Proposed Action, Figure 2; Exhibit 1 (CBMR Summer Trail Map).(5) Proposed Action at 26.(6) CBMR Permit [sect] I.G