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Comments: See attached PDF for comment letter on the North Valley Trails plan signed by Mayor Ian Billick as approved by the Crested Butte Town Council on 3/7/2022.

USFS added letter text from attachment for coding purposes:

North Valley Trails Plan IDT & Gunnison District Ranger

The Town of Crested Butte (Town) is happy to provide comments on the 'Refinement of the Proposed Action to the North Valley Trails Plan'. We hope to see adjustments made to ensure the dedication and work of scoping the plan by the Crested Butte Mountain Bike Association (CBMBA) through comprehensive community engagement efforts over the past 8+ years is reasonably considered. Their work with local organizations of widely varying interests and willingness to adjust the plan based on reasonable feedback has been outstanding.

During their scoping process, CBMBA made various presentations to the Sustainable Tourism & Outdoor Recreation Committee (STOR) and eventually received a letter of endorsement for their 'Riders Off The Road' trail plan, with a list of priority trails to be of short term interest. The STOR committee has been widely successful in bringing together varying interests across the county to ensure balanced recreation planning as our, county continues to see increased impacts from exploding use of regional public lands. Town is highly supportive of STOR and the process taken to endorse the trail plan. CBMBA removed over 20 trail segments from their plan and made substantial adjustments to many proposed segments based on feedback from a wide range of stakeholders including; Colorado Parks & Wildlife (CPW), High Country Conservation Advocates (HCCA), Bureau of Land Management (BLM), Gunnison Stockgrowers Association, Crested Butte Land Trust (CBLT), Rocky Mountain Biological Laboratory (RMBL), Town, Gunnison Public Lands Initiative (GPU), United States Forest Service (USFS), Gunnison Wildlife Association (GW), Silent Tracks and many others.

Town would like to submit specific feedback on a variety of adjustments made from the proposal endorsed by STOR to the Refinement of the Proposed Action : North Valley Trails document published by the Gunnison National Forest.

1.

Lake Irwin Road Parallel Trail

1. Under "IDT Discussion or Concerns" on page 3, the existing wagon trail is listed as a "sustainable beginner level trail." Town respectfully disagrees with this classification as this trail has several challenging dips, wet areas, and steep switchbacks. Town would much prefer to see the trail in the low wetland areas decommissioned and the near road alignment proposed by CBMBA realized. This alignment will have a more usable and consistent grade while accomplishing the goal of removing riders from a heavily traveled road.
2. The proposed alignment by CBMBA creates a trail that will be realistically used by various folks traveling to Lake Irwin and beyond. The current, wandering alignment through the wetlands and up the steep hillside adds too much distance on relatively undesirable trail for many users to utilize it.
3. Town feels the alignment proposed by CBMBA meets a few different goals in the Purpose and Need section including realigning non-sustainable routes, improving trail and recreation infrastructure in already-impacted

areas, and moving non-motorized users off busy roads and onto trails.

4. The elk migration corridor listed in IDT Discussions or Concerns is also improved with the proposed CBMBA alignment by decommissioning lowland trails and moving them towards already impacted areas by heavily utilized roadways.

5. Town is supportive of design features to improve OSV user safety (pg. 4) in this heavily concentrated winter motorized use area.

2.

Upper Upper to the Brush Creek Trail head

1. CBMBA collaborated with community members to define an alignment that would protect sensitive areas. Town would like to see the original alignment reconsidered because of this effort. The alignment further away from the road would also benefit the user experience. These factors combined, in this specific instance, outweigh the small impact to grazing disbursement mentioned under IDT Discussion or Concerns (pg. 4).

3.

Strand Bonus to 409

1. Town is supportive of the Strand Bonus to 409 alignment proposed by CBMBA and the general stacking of trails in this already heavily impacted area.

4.

Budd Connection

1. Town generally prefers to see alignment of trails remain on public land as much as possible so easements do not need to be obtained and managed. Considering the topography, it seems unlikely that this could be moved off the private parcel and is supported by Town.

5.

Deer Creek to Tent City

1.

Under IDT Discussion or Concerns on Page 7, Town would want to see the alignment proposed by CBMBA and endorsed by STOR implemented. The collaborative process to reach this consensus was heavily vetted.

1. Town would like to see assurance that wetland concerns wouldn't create an unsustainable alignment when splitting the two 'potential wetland areas'.

6.

Teocalli Extension

1. Town is supportive of this additional segment to improve user experience and eliminate bikes entering the road at high speeds and continuing to travel down the road with potential for high velocity impacts.

7.

Reno Divide Road Parallel

1. Town is supportive of this segment to reduce user conflict and potential impact to adjacent wetlands.

8.

Upper Cement Creek Trail to Crystal

1. Town would like to see maps of proposed segments that were removed by the USFS so the public has a better understanding of what is being rejected.
2. Town also respectfully disagrees that those out on large loops would continue to utilize the road as listed in IDT Discussion or Concerns (pg. 9). People embarking on difficult, extended backcountry rides still prefer singletrack over roadways whenever possible. This is repeated feedback that CBMBA has received and a catalyst for them creating the 'Riders Off The Road' proposal.

9.

Lower Cement Creek Trail to Caves

1. This trail will drastically increase user safety and experience along a heavily traveled segment of the Cement Creek Road. Town is highly supportive of this connective feature.

10.

Bear Creek Reroute

1. The benefits of reducing turnpike maintenance and concentrating users in an on the ground sustainable section of trail is highly supported by town.
2. The consideration of the trail alignment being adjusted in the elk production area (pg. 11) should carry far more weight when evaluating the Ripley Timber Sale. With the exception of diseased tree removal, Town feels the sale should be adjusted, not the wildlife corridor and recreational access area.
3. While Town would like the CBMBA proposed alignment implemented, we would also like to ensure that should the USFS alignment be approved that it achieves the goal of moving out of the wet lowland area.

11.

Dr. Park Reroute

1. Town is disappointed to see this segment removed. As one of the most sought-after trails in the state and most heavily utilized in the GMUG, this realignment provides a high user experience benefit and reduces maintenance needs substantially.
2. Again, Town would like to see maps attached to any removed segments so the public can better understand what is being rejected.
3. Town supports the original alignment as proposed by CBMBA and endorsed by STOR following widespread collaborative efforts. It is not clear as to why the is segment was removed. Justifications listed under IDT Discussion or Concerns (pg 11) listing additional maintenance efforts to maintain the current alignment are not within USFS capacity and often require outside organizations to utilize already limited volunteer efforts that could be more effective elsewhere.

12.

Day Use Areas

1. Town agrees that these areas are good candidates for improvements that can reduce impact on the surrounding landscape. Considering permanent improvements will help reduce user conflict, parking management issues and concentrate human waste disposal, Town is in support of all these improvements.
2. Specifically, the winter trailhead at Brush Creek has become overcrowded with day users parking along the already narrow road, often reducing the ability for cars to safely travel both ways. These improvements should be prioritized to accommodate increased numbers.
3. Prior to implementation, Town would like an opportunity to comment on development in these areas to ensure community needs are being met.

While enhancing trail systems will greatly increase opportunities for recreationists, we also recognize trails come at a cost to other objectives that the Town values, including ecological sustainability and ranching. Town encourages the USFS to carefully consider how those trails are managed to minimize such impacts. For example, the USFS should avoid approving special event permits that bring in significant visitors when the community is already stretched to manage high levels of visitation.

As the Forest Service continues to make difficult decisions regarding recreational improvements, we encourage them to value the community processes, like STOR, that have been implemented valley wide. These processes amongst stakeholders with widely varying priorities have produced excellent results in the projects they have undertaken. Town supports the endorsements that STOR provides and will continue to support their efforts. As the Gunnison National Forest is in a transitional period for multiple high-level officials, Town encourages the USFS to lean on the collaborative community organizations even more when making decisions. As always, Town appreciates the opportunity to comment on these proposals and hopes to continue working with the USFS and our community to come to conclusions that produce benefits valley wide.

Best

Ian Billick, Mayor