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First name: Hannah

Last name: Kersting

Organization: Gunnison County Stockgrowers&#39; Association

Title: President

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United States Forest Services

Gunnison Ranger District

216 North Colorado Street

Gunnison, CO 81230

Re: Comments of the Gunnison County Stockgrowers Association, Inc. on the North Valley Trails Environmental Assessment

Dear Dayle Funka,

Please accept the following as the comments of the Gunnison County Stockgrowers' Association, Inc. (GCSA) on the North Valley Trails Environmental Assessment. An incorporated non-profit company founded in 1894 for the protection of range privileges and the interests of the stock raising industry, GSCA represents nearly all the active livestock producers in the Gunnison Valley in Colorado and advocates on behalf of its members, the cattle producers and ranch families of the Gunnison.

Grazing in the Gunnison Basin contributes millions in economic revenue to the local community, provides hundreds of jobs, and sustains critical wildlife habitat values across its significant private land base. A 2006 study estimated the direct and indirect impacts of the "cattle sector" in Gunnison County had a "combined impact of more than \$46 million in 2003" (Tadjion and Seidle 2006). A more recent analysis put the total direct value of livestock in Gunnison County at about \$18,644,000, and valued forage produced in the County at \$1,762,000 (2017 Census of Agriculture).

The GCSA has a long tradition of resource management in the Gunnison Basin including the formation and development of the original language of the Taylor Grazing Act used by Congressman Ed Taylor in the 1930s; significant participation in the passage of the Colorado Wilderness Bill of 1980; an active leadership role in the creation of the BLM's Resource Management Councils in the early 1990s under Interior Secretary Babbitt and Governor Romer; and an active and cooperative effort in the last two decades with Colorado Parks and Wildlife (CPW) to protect and preserve the federally listed Gunnison Sage Grouse (GuSG) across the Gunnison Valley.

The GuSG effort involved the expenditure of millions of private, county, and state funds and is currently supported by members of GCSA through their enrollments under the USFWS-approved Candidate Conservation Agreement with Assurances (CCAA) covering thousands of acres of private land and through the Candidate Conservation Agreement addressing grazing on federal lands in the Gunnison Basin.

We appreciate the time and effort put forth in this Environmental Assessment (EA).

The GCSA appreciates the economic and environmental benefit of our open lands. We are opposed to further fragmentation of this resource. We support the trail system as it exists presently, but we do not support new trails that are proposed to be constructed in areas that currently free from trails. We do not support connector loops that further fragment the resource. New trails create soil disturbance and allow invasive weeds to enter into the landscape. Part of the draw of the North Valley Trail system is the visual integrity of the open spaces - more trails will only destroy these views. It is important that we look at managing the resource so that we are not exceeding the recreational carrying capacity. We also believe this is tied to taking a long-term approach to managing our valuable resource.

We have some specific concerns within the North Valley Trails plan. We agree with option 2, no new trail construction for "Strand Bonus to 409". We agree with this option as well as the rationale, "This trail is identified as a poor match for the Need for the Proposal. The mixed use on the existing road isn't heavy enough to warrant a parallel trail. This option protects wildlife and livestock habitat."

We agree with Deer Creek to Tent City Connection, option 2, "Lower Portion Only". We also agree with the rationale, "Minimize impacts to potential wetlands, wildlife & livestock operations."

We do not support the Upper Upper to Brush Creek trail proposal. We do not see a necessity. That area of the road is the widest point and it only puts recreationalists back onto the road before it gets narrower. If it is constructed, we agree with option 2 that it is necessary to keep it as close to the road as possible. We would also like the proposed trail to be closed during grazing season.

We agree with the Forest Service's determination, option 2, no new trail construction, on the Upper Cement Creek to Crystal trail. We agree with the rationale, "This trail is identified as a poor match for the Need for the Proposal. The mixed used on the existing road isn't heavy enough to warrant a parallel trail. This option protects fragile high alpine vegetation, potential wetlands, unique mineral spring resources, and wildlife habitat."

We also agree with the Forest Service's determination, option 2, no new trail construction or decommissioning, on the Dr. Park Reroute. We agree with the rationale, "This trail reroute is identified as a poor match for the Need for the Proposal. The reroute would have a greater impact to big game species. The routes proposed for decommissioning in Option 1 are desired retain for continued multiple resource needs."

We have concerns with the Brush Creek parking lot expansion. The expansion will take some of an existing permit - how will these impacts to the permittee be mitigated? If this parking lot is put into place no parking should be allowed between the parking lot and Tent City.

We also have concerns with the Walrod parking lot expansion. Previous talks have been had with consideration to install corrals and loading chute in this exact area. How will the trade-offs between these two be rectified?

Thank you for the opportunity to comment on this EA. We look forward to continuing to work with the Forest Service.

Respectfully,

Hannah Cranor Kersting

Gunnison County Stockgrowers Association President