

March 1, 2022

To Whom It May Concern,

As a Colorado nonprofit corporation whose mission is protecting and enhancing the health and sustainability of wildlife and public lands in the Gunnison Basin, Gunnison Wildlife Association (GWA) thanks you for the opportunity to provide comments on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests' North Valley Trails Project.

Colorado's population is growing rapidly, and as noted in the Purpose and Need for this project, over the past decade, recreation use on the forest has substantially increased. With this, the need for greater protection of wildlife and its habitat, as well as enhancements to this habitat, is stronger than ever.

Without delving too deep into specific proposed trail segment modifications or additions, following are GWA's general thoughts on the proposed action for the project.

Purpose and Need

As noted, a short-term plan for North Valley Trails was initially drafted and refined by Crested Butte Mountain Bike Association (CBMBA), and based on that plan, the Sustainable Tourism and Outdoor Recreation (STOR) Committee issued a recommendation on a refined version. To be clear, it's our understanding that this was only an endorsement for consideration of the plan by the U.S. Forest Service under the National Environmental Policy Act (as opposed to an endorsement of the plan itself). We greatly appreciate that the Purpose and Need, as developed by the Gunnison Ranger District's interdisciplinary team, establishes the foundation and rationale for the proposed action.

We value the decision to modify or remove from further consideration trails that did not meet the Purpose and Need or that had known resource concerns. And, more specifically, we appreciate that the objective of the project is focused in large part on connecting existing trails; realigning non-sustainable routes in order to prevent further resource damage; and designating proper trail access points and infrastructure — as opposed to creating new routes in areas where recreation is less concentrated, thus resulting in greater habitat loss and fragmentation.

We believe it is crucial that the impacts of this project are largely confined to already-impacted areas and that no proposed new trails are in Colorado Roadless Areas, Designated Wilderness, or in proposed wildlife management areas in the ongoing Forest Plan Revision. For this, GMUG, CBMBA and STOR should be commended.

Dispersed Impacts

All of this said, while we understand that part of the objective of the project is to move non-motorized users off busy roads and onto trails, we are concerned that this would result in redundant routes — e.g., new trails parallel to existing roads. This redundancy disperses impacts from recreation to a greater degree across the landscape. Increasing variety and

diversity of trails for different users and ability levels has the same negative end result, as do the three day-use area expansions and developments identified in the proposed action.

Furthermore, while we certainly support the need for adequate toilet facilities, we worry that the development of new trailhead infrastructure and designation of additional parking space will have the unintended effect of attracting even more trail users than at present. This would result in a need for additional expansion in the future, thus creating a cycle of continuous incremental development of trails and associated infrastructure. All of this results in continued encroachment of human recreational impacts upon wildlife and their habitat.

We implore GMUG, CBMBA, STOR and other recreation-focused organizations to remain mindful of these impacts into the future and work hard to avoid, reduce and prevent any additional loss or fragmentation of wildlife habitat. For instance, GWA would strongly support the adoption of a policy or program on National Forest lands throughout the Gunnison Basin, whereby for every mile of new trail constructed, a mile of existing trail is decommissioned. We would welcome discussing this concept in further detail with GMUG, CBMBA, STOR and others.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cody Dyce', with a stylized, cursive script.

Cody Dyce

President

Gunnison Wildlife Association Board of Directors