

# Town of Crested Butte

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*-A National Historic District-*

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Gunnison District Ranger Funka

The Town of Crested Butte is pleased to offer comments on the Draft North Valley Trails Environmental Assessment (EA). We appreciate the opportunity to participate in this public process and hope to see a decision that reflects the intensive local collaboration and community engagement that has occurred over many years as well as the detailed work of Agency experts portrayed in the Draft EA. We do appreciate how responsive this draft is to feedback from The North Valley Trails IDT. It is clear that the USFS carefully considered the feedback it received and made numerous changes in response to that feedback. With that said, the endorsement received from the Gunnison County Sustainable Tourism & Outdoor Recreation Committee (STOR) was heavily vetted and its importance to the community cannot be understated. As the responsible official, we are hopeful that a decision will be made with strong consideration of these processes and net forest needs, not specialty areas.

As requested in the North Valley Trails EA Opportunity to Comment Letter published on March 27<sup>th</sup>, 2023, we would like to offer specific feedback on segments as proposed and Draft EA specifics.

## Transparency

In original comments submitted by Town regarding the North Valley Trails Plan IDT on March 8<sup>th</sup>, 2022, Town requested increased transparency regarding trail segments that had been initially rejected. We appreciate the increased transparency regarding the inclusion of the originally excluded segments in the Draft EA. An additional section to ensure transparency and public trust in the process would be explicit inclusion of the 'no action/existing condition' alternative more clearly. As written, the Draft EA appears to show only two options, when there are really three when 'no action' is included. This could be effectively conveyed using the tables on pages 11 & 12.

## Forest Health & Noxious Weeds

As we continue to see beetles and other species that cause overstory mortality creeping further up into our drainages, we'd like to ensure that the vegetation management practices listed on pages 26-27 & 64-65 are included in the ROD. As Town continues to deal with these issues on our own conserved parcels, many of which are adjacent to USFS lands, these management practices are important to slow the spread of these insects' valley wide.

In addition to points listed in the table on pages 24-25 regarding noxious weeds, monitoring should be increased specifically in areas that have been disturbed to identify emerging noxious weed populations that may have been unintentionally introduced during construction or decommissioning of trails.

### Watershed & Wetlands

Town is pleased to see that the net classifications under the Watershed Conditioning Framework will not change under any of the proposed options. While the densities per sq mile may not be reduced enough to change any “Functioning at Risk” watersheds to “Functioning Properly”, we feel the density reductions should be considered in the decision as several of the preferred options aim to move trails out of wetlands. Town is supportive of USFS watershed personnel selecting stream crossing locations as listed on page 68.

### Wildlife

The anticipation that this proposal will not restrict Canada Lynx movement (pg 77), or impact Boreal Toad habitat (pg 92) furthers support for the proposal from Town.

Regarding parallel trails potentially increasing wildlife harassment due to off leash domesticated animals, Town would support a Forest Order to help prevent this as proposed on page 34. However, we would want to see it accompanied by an increase in general enforcement on the Forest, which has been a community desire in recent years as use has exploded.

### Livestock & Grazing

Town is generally supportive of seasonal or partial day closures (such as morning) to prevent conflict with livestock management operations as suggested in the table on page 33. This support would increase if these closures were to result in the more desirable trail alignments identified by the community.

While rollover cattle guards are certainly the preferred recreational experience, Town is understanding of the necessity in certain areas for gates (pg 52). Town would like to see the exploration of alternative designs that may facilitate both users such as different spacing or angles for the rollovers to ease livestock manager concerns and facilitate higher quality recreational experiences if possible. In areas where gates are necessary, uphill signage on routes where gates may be approached at high speeds by cyclists is paramount to prevent injury.

### Specific Trail Proposals

#### Lake Irwin Road Parallel Trail

- Weighing the historic context (pg 30) vs wetland impacts, option 1 is superior. Town would respectfully disagree with the analysis in the table on page 11 that rationalizes option 2 by saying it has a minimal impact on the wetlands. While this would be true in the implementation phase, the long-term benefit to the wetlands outweighs the short-term impact of decommissioning the wagon trail.
- If the National Historic Preservation Act prevented the decommissioning of the Wagon Trail through the wetlands, Town would support option 2.
- The alignment of CB-Carbondale is very important to our long-term trail goals (pg 30). However, we feel there is a reasonable alignment that can be found as this project continues to develop.
- A future parking area north of NFSR 826 and 826a is contemplated on page 35 which Town would generally support to improve the user experience and safety in this busy corridor. It would likely require the acquisition of the Crested Butte Land Trust parcel owned in that vicinity.
- Town does not support a no action alternative.

#### Upper Upper to Brush Creek

- Town supports option 1 for this part of the proposal with the addition of an alignment flexibility zone. An alignment that increases the user experience will encourage users to ride from Town trail systems out to Cement Creek instead of driving, an important goal for Town.
- Should an alignment next to the road be chosen, Town does not feel a seasonal closure as proposed on page 53 would have any significant impact on livestock operations.

- Town does not support a no action alternative.

#### Strand Bonus to 409

- Town supports the option 1 alignment as it would encourage users to park at the Tent City improvement to ride 409, 627 and others in the area instead of driving on the rough Farris Creek Road.
- Town does not support a no action alternative.

#### Budd Connection: Ambush to Tent City

- Option 1 is supported by Town and would also encourage users to concentrate in the Tent City parking improvement area to ride trails that they may otherwise drive to off Farris Creek road.
- Town would encourage the USFS to pursue acquiring the easement across the private land on their own or in partnership with another local agency.
- Town does not support a no action alternative.

#### Deer Creek to Tent City

- Supporting option 1, Town agrees that the implementation should make every effort to avoid impacting the wetlands as referenced on page 72.
- Town agrees that the parking area at the junction of 738 and 738.2A should have been considered as referenced on page 40 and should be reserved for a future NEPA effort.
- The idea to extend towards the designated campsite above West Brush Creek referenced on page 41 would be supported by Town.
- Town does not support a no action alternative.

#### Teocalli Extension

- Town supports option 2 with a slight reduction in the western flex zone to protect livestock from being scared into the cattle guard as referenced on page 54.
- Town respectfully disagrees with the idea that there is “no apparent safety driver for this proposal” as the vehicle speed is generally slow, stated under Direct and Indirect Effects on page 42. The speed concern comes from moto and pedal bikes traveling downhill at high speeds and potentially colliding with a vehicle. The safety driver here removes these users from the road entirely.
- Town is also supportive of finding an alignment that does not dump motorized users directly onto a non-motorized trail as referenced on page 42. This will preemptively reduce potential user conflicts and keep users on their designated systems.
- Town does not support a no action alternative.

#### Reno Divide Road Parallel

- Town supports option 1 for this part of the proposal.
- Town does not support a no action alternative. However, if it is chosen, Town supports managing the Reno Divide Road as a trail and not a road (pg 11).
- The statement on page 34 regarding Boreal Toad habitat appears incomplete as the goal of the proposal is to remove the segment from the wetlands. While the implementation may impact a small segment, the decommissioning will have a net positive impact.
- The decommissioning of the braided user created system along NFSR 759 is an important aspect of the proposal and Town is very supportive of the extra steps being taken to achieve this.

#### Upper Cement Creek to Crystal

- Town supports option 1 to improve the recreational experience for users on extended backcountry rides in this area.
- Town does not support a no action alternative.

### Lower Cement Creek to Caves

- Town supports option 1 as proposed.
- Additional signage at road crossings to increase user safety as laid out in Table 2 on page 24 is supported by Town.
- There appears to be a misprint on page 45 under Direct and Indirect Effects stating “While Option 2 would improve the quality of the recreation....” There is no option 2, option 1 was likely the intended reference here.
- Town does not support a no action alternative.

### Bear Creek Reroute

- Option 1 is supported by Town in this instance.
- In general, Timber sales such as Ripley, should be adjusted to accommodate recreational users and wildlife, not the other way around (pg 65).
- As referenced on page 74, the watershed benefit of decommissioning the current alignment and building the new alignment is a net positive, which Town supports.

### Dr Park Reroute

- Town feels the net benefit of the originally proposed option 1 is still the most effective. We are confident, through experience working with CBMBA on our own lands that they will be effective in decommissioning the trails. Reducing the overall density in this area ultimately benefits wildlife, livestock, trail maintenance costs, scenic integrity, and other values. Temporary grazing closure in the direct vicinity of the restoration would be reasonable, just as it often is for recreational users in restoration areas. Option 2 does not decommission routes, which leaves a high route density in the immediate area. There has been a high success rate of compliance on closed routes in Crested Butte and Taylor Park over the past 10 years as referenced page 75 and we believe this can be implemented here as well.
- Something occurring for a long period of time, as referenced on page 48 under rationale for no action, is not a defensible justification of continuing practices.
- Town does not support a no action alternative.

### Day Use Areas

- Town supports all the proposed day use area improvements.
- The proposal to restrict roadside parking referenced on pages 37 and 49 could potentially create an unravelling of recreational use in these areas. Many of these parking improvements will improve day-to-day operations but there will almost certainly still be spillover during peak seasons. While Town is generally supportive of reducing vehicle traffic in the drainages, it needs a careful approach to be successfully implemented with the public.
- At Brush Creek, Town would support expanding to the North before consideration of the East/West expansion to prevent the need for extensive engineering, retaining walls, etc. as referenced on page 37.
- Town also supports the addition of a vault toilet at Brush Creek.
- At Tent City, as listed on page 40, Town is very supportive of ensuring the camping and parking areas remain functionally separate as this has become a substantial in other areas on the Forest, such as musicians camp.

These trail additions without doubt have impacts on other Town values such as ecological sustainability, ranching and scenic integrity. We believe that the vetting process undertaken to build the proposal and the subsequent studies undertaken at the USFS show that this proposal will be effective in balancing the needs of all users on the forest. As we continue to see heavy use on our trail systems in the North Valley, we encourage the USFS to carefully consider approval of special event permits that bring visitors during peak seasons when the community is already stretched to manage high levels of visitation.

We hope to see decisions regarding these recreational improvements consider the input from the public and the extensive vetting processes that have taken place over the last several years. Town continues to support the endorsement from STOR and appreciates the support they provide across diverse user groups to evaluate proposals like this. Town appreciates the opportunity to comment and looks forward to continuing to work with the USFS and our community to create positive outcomes on our public lands.

Respectfully

A handwritten signature in black ink, appearing to read "Ian Billick". The signature is written in a cursive, flowing style.

Ian Billick, Mayor

Town of Crested Butte