

**Crested Butte Town Council, Crested Butte-Colorado**

December 18<sup>th</sup>, 2023

Dayle Funka  
Responsible Official for Record of Decision for North Valley Trails  
District Ranger  
Gunnison Ranger District  
216 North Colorado Street  
Gunnison, CO 81230

*Submitted electronically via project website at*  
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=61177>

**Notice of Objection to the Draft Record of Decision and Final Environmental Assessment for North Valley Trails Project #61177**

**OBJECTOR CONTACT**

Pursuant to 36 CFR Section 219.54 (c)(3) the The Town of Crested Butte, located in Crested Butte, Colorado is designated as the objector.

Town of Crested Butte  
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Recreation, Open Space & Trails Supervisor  
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**NOTICE OF OBJECTION**

The Town of Crested Butte files this objection to the Draft Record of Decision and Final Environmental Assessment for North Valley Trails project #61177 proposal on the Gunnison National Forest, located in the Grand Mesa, Uncompahgre, Gunnison National Forest.

**ELEGIBILITY TO OBJECT**

The Town of Crested Butte has participated in all available comment periods for the North Valley Trails plan. Town submitted comments during the scoping period on 3/8/2022 and after publication of the Draft EA on 5/1/2023. Both comment letters were submitted in a timely manner to the material publication dates and their respective comment periods.

**STATEMENT FOR REASONS**

Throughout the North Valley Trails process, the Town of Crested Butte and other local organizations have advocated for the heavily vetted proposal submitted by the Crested Butte Mountain Bike Association (CBMBA) to be implemented. The plan was thoughtfully created, vetted with local stakeholders, and endorsed by the

Gunnison County Sustainable Tourism Association (STOR). While reasonable adjustments to the initial plan have been made and conceded to by local organizations, there has been subjective disregard to important aspects of the plan in direct conflict with the EA by the Gunnison District Ranger in the Draft Record of Decision, particularly regarding Doctor Park.

Our comments submitted on 3/8/2022 (LID 61177-4195-20) & 5/1/2023 (LID 61177-4994-88) as well as a significant number of comments submitted by local organizations repeatedly request more reasonable rationale be applied to the Doctor Park reroute. Examples below point out the flawed logic in the removal of Doctor Park reroute by the Gunnison District Ranger in the project. This line of thinking is not solely limited to Doctor Park. In fact, it is easily drawn from many of the alterations that have been made by the Agency throughout the DROD. However, Town has chosen to focus on Doctor Park, where it is the most obvious.

- The rationale of permittees being unable to alter basic operations since they have been utilizing existing trails for decades (p49) undercuts the ingenuity, sophistication, and ability of these operations. The rationale listed for impact on grazing operations directly conflicts with the information on page 52 of the EA where cattle utilize the open pasture. It also directly contradicts the preferred option listed on page 56 under Direct and Indirect Effects to Range/Grazing Management. Lastly, there is nothing directly listed in the record showing opposition from operators in the area to the realignment.
  - “Direct effects of decommissioning of 3.4 miles of trail that crosses through suitable grazing areas and constructing a new 1.2-mile trail through timber will benefit livestock grazing by decreasing the likelihood of conflict and distribution issues.” (EA Page 56)
  - “Option 1 is preferred with one design criteria, administrative access for maintenance to the developed livestock pond in Gandy Gulch must be sustainable after the trail decommissioning.” (EA Page 56)
- Option 1 is also the preferred alternative listed in the Watershed Direct and Indirect Effects to reduce route density.
  - The rationale in the Draft Record of Decision again directly conflicts with the EA. It utilizes speculation rather than the explicit analysis performed by the Agency. “Option 2 does not decommission routes, which leaves a high route density on the landscape. In the Taylor Park area, the Gunnison Ranger District has successfully closed and rehabilitated routes. There has been a high success rate of compliance on closed route in Crested Butte and Taylor Park over the past 10 years.” (EA Page 75)
- Again, the wildlife rationale for removing Doctor Park reroute in the Draft Record of Decisions directly conflicts with the analysis of the EA. In fact, Doctor Park is explicitly excluded from the elk habitat density analysis listed in the EA while many other options to be implemented are included. Additionally, the overlap of calving areas and recruitment reduction factors are worse than what would be their final state in the existing condition versus if option one was implemented, as listed in the quote below. Lastly, the determination from the EA clearly states it is not likely to result in a loss of viability as elk are already avoiding the project area during primary use seasons.
  - “Most areas of the proposed trail option (all areas except for Doctor Park) areas currently exceed this peer reviewed impact threshold.” (EA Page 95)
  - “Doctor Park reroute and decommissions, and Upper Cement Creek to Crystal directly overlap with calving areas providing reduced opportunities for recruitment; however, these are likely already impacted due to presence of roads.” (EA Page 96)

- Maintenance costs are speculated to have “no net effect” (EA page 49) due to the terrain type, which meets goals listed throughout the EA. The proposal in the Draft Record of Decision to “keep and invest in the maintenance of the existing trail system” directly conflicts with rationale provided throughout the EA and listed in other areas of the Draft Record of Decision to reduce maintenance costs. This decision also directly conflicts with statements in the Purpose and Need section of the Draft Record of Decision (pages 1 & 2, DROD). Additionally, the partner organization who produced the proposal and does the bulk of the maintenance on this section of trail, has clearly stated that this would significantly reduce the amount of maintenance necessary in this reach. Town again asks the Agency to be responsive to this technically improved and cheaper option, as shown throughout the EA, for the Doctor Park route.

Doctor Park is the number two trail in the Gunnison Valley on TrailForks, the leading provider of usable information for mountain bikers on the internet worldwide. It is also listed as a 100 in popularity, the highest possible rating. If there is anywhere to implement reasonable changes to improve the user experience, reduce maintenance costs, and align with Agency logic throughout the EA, it is in the Doctor Park corridor. The Town of Crested Butte strongly urges the Gunnison Ranger District to reevaluate the exclusion of Doctor Park in the project based on the analysis performed by the agency and the strong community support around this section of the proposal.

Approved for submittal by the Crested Butte Town Council on December 18th, 2023

Dara MacDonald, Town Manager

