

January 1, 2024

Chad Stewart
GMUG Forest Supervisor
2250 South Main Street
Delta, CO 81416

Dayle Funka
District Ranger
Gunnison Ranger District
216 North Colorado Street
Gunnison, CO 81230

Re: North Valley Trails Project #61177
Objection to Decision Notice and Finding of No Significant Impact

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=61177>

Dear Mr. Stewart and Ms. Funka:

I am objecting to the Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the North Valley Trails Project issued on November 16, 2023. The Responsible Official for the project is Ms. Dayle Funka, District Ranger, Gunnison District, Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests. The project is located in the Gunnison Ranger District within Gunnison County, Colorado. The Reviewing Officer for this objection is Mr. Chad Stewart, GMUG Forest Supervisor.

I am a resident of Mt. Crested Butte, Colorado and provided comments for the North Valley Trails Project during the scoping period (my comments submitted on 3/21/2022) and after the draft Environmental Assessment (EA) was published (my comments submitted on 4/14/2023).

My name, address, phone number, and signature are provided at the end of this letter.

Throughout this entire process, an overwhelming number of individuals and local organizations have supported the Crested Butte Mountain Biking Association's (CBMBA's) detailed and thoughtful rationale for improving the quality, condition, and location of existing and new trails that will further enhance the overall trail system while protecting wildlife, wetlands, scenic quality, and the safety of all non-motorized users.

My specific comments during the scoping period (LID 3791597) and the draft EA (LID 3925320) fully endorsed CBMBA's original plan and their "Option 2" compromises to the draft EA. My comments also singled out the Doctor Park Reroute as in great need of attention due to the untenable and embarrassing degradation of the existing trail alignment at the start of this world-class trail.

My objection concerns the logic and reasoning used by the District Ranger in the DN and final EA to select Option #2 (no action) for the following trail segments: (1) Doctor Park Reroute; (2) Strand Bonus to 409 Connection; (3) Upper Cement Creek to Crystal Connection.

Overall, the "no action" decision made by the District Ranger for the three trail segments above conflicts with the will and wishes of the vast majority of Stakeholders that commented and/or contributed during

this process, is not supported by the findings contained in the EA, and does not align with the stated Purpose and Need detailed on pages 1 and 2 of the DN / FONSI. Specifically, the DN states:

“The objective of this project is to provide higher quality and more diverse user opportunities in the greater Crested Butte area by facilitating safer, responsible, and sustainable recreation infrastructure improvements to the current trail system. This will be achieved by connecting existing trails, realigning non-sustainable routes, and designating proper trail access points and trailhead infrastructure.

There is a need to construct new single-track trails and associated infrastructure, as well as reroute and decommission non-sustainable or excess existing trail segments to:

- *Improve trail and recreation infrastructure in already impacted areas;*
- *Move non-motorized users off busy roads and onto trails where safety concerns are prevalent to reduce potential vehicle collisions and congestion, benefiting user opportunities;*
- *Mitigate resource damage from existing poor trail locations and/or alignments;*
- *Increase variety and diversity of trails for different users and ability levels; and*
- *Define appropriate access points (trailheads) for users.*

The collection of trail realignments, new trail segments and trailhead improvements, and trail decommissioning that make up the North Valley Trails project were collaboratively developed by community partners.”

The details found in the purpose and need were created via a collaboration of a diverse number of stakeholders, all with an interest in maintaining and improving the existing trail system in and around Crested Butte. These stakeholders included CBMBA, the Gunnison County Sustainable Tourism and Outdoor Recreation (STOR) committee, Rocky Mountain Biological Laboratory (RMBL), High Country Conservation Advocates (HCCA), and many in the ranching and wildlife community. CBMBA spent several years working with these specialists and organizations to vet the proposed action and their findings were in support of the proposed action utilizing scientific analysis and professional observations.

A summary of my objection to the selection of “Option 2” in the DN and detailed in the EA for the three trail segments is presented below.

1. Doctor Park Reroute: the “no action” decision based upon “the multiple uses of the existing trail system and potential impact to elk reproduction and big game species” is simply not supported by the EA, directly contradicts the actual reality at the trailhead and associated negative impacts of the existing trail alignment, and ignores the wishes of the varied spectrum of stakeholders that use this trail. Investing in the maintenance of the existing trail system here is akin to throwing good money after bad. Additional specific examples of EA findings that contradict the “no action” decision for this trail segment are found in the notice of objection submitted by the Town of Crested Butte on December 19, 2023.
2. Strand Bonus to 409 Connection: the “no action” decision based upon “potential impacts to wildlife habitat and livestock use” and “mixed use occurring on the road is not high enough to support a safety concern” is also not supported in the EA. Wildlife habitat and livestock impacts

are negligible for this proposed trail segment, as the existing salting area location can easily be adjusted. I'm confident livestock grazed here for the 30ish days each year will find it wherever it is placed and the appropriate distribution of cattle in this pasture can be maintained with little effort. The specter of potential user-livestock conflicts is also not a reasonable concern, as many trails in and around Crested Butte (including 401, 403, and Deer Creek to name a few) already place trail users and livestock in close proximity with no significant issues. Regarding safety concerns, they are indeed present and growing on all roads, including NFSR 736. Additionally, the creation of this connector trail squarely fits into the Purpose and Need by increasing the variety and diversity of trails for all ability levels (this specific trail will accommodate all ability levels) – and greatly reduce the potential for bike – motor vehicle conflicts / encounters present with the current trail alignment that requires using NFSR 736.

3. Upper Cement Creek to Crystal Connection: the “no action” decision states this trail segment “does not have a significant safety driver” and “impacts to scenery, wildlife, and wetlands outweigh the potential future conflict between motorized users and non-motorized users on the existing road.” This reasoning is simply not in sync with the Purpose and Need statement found in the DN. This trail segment meets all 5 bulleted Needs and has the support of many diverse stakeholders that participated throughout the planning process – including STOR, HCCA, wildlife proponents, RMBL, and the ranching community. In addition, this trail segment would increase “diverse user opportunities” in this area, as all ability levels (including beginner and intermediate bikers) would be able to ride this trail. This segment has the potential to become a wonderful introduction to remote, high elevation and scenic singletrack for beginners. Finally, the current state of NFSR 740 is terrible this far up Cement Creek. It is massively eroded in sections and suffers from significantly damaged infrastructure. This condition contributes to the unsafe conditions and is exacerbated by the ever-increasing use of NFSR 740 by UTVs and other motorized vehicles. The separation of non-motorized and motorized users through the creation of this trail segment will greatly increase the current and future safety of all users.

Finally, the ability and willingness of CBMBA and the Crested Butte Conservation Corps (CBCC) to build and maintain the trail segments discussed above should mitigate the District Ranger's concern regarding the current maintenance backlog and constrained appropriated funding for trails. CBMBA has a proven track record of working with and supporting the Forest Service on trail construction and maintenance projects throughout the North Valley and will continue to do so for these and all approved trail segments.

The “no action” decisions made by the District Ranger to the trail segments discussed above appear to be arbitrary, capricious, lack scientific justification, and based on the subjective opinions a few stakeholders. These “no action” determinations signal not only a lack of responsible management of the resource, but a lack of understanding of the needs on the ground.

The suggested remedy to my objection is to revise the DN and select Option #1 as detailed in the final EA for the three trail segments listed above. Option #1 is more fully supported by the findings of the interdisciplinary team and summarized in the final EA and by the vast majority of stakeholders that live, work, and play in Gunnison County.

I sincerely appreciate the time and effort put forth by the US Forest Service to develop and finalize the North Valley Trails EA and look forward to enjoying the enhanced riding and hiking experience that will result from the trail upgrades authorized by the District Ranger in the revised DN.

Please contact me if you have any questions or need additional information.

Best Regards,

A handwritten signature in blue ink, appearing to read "CT Hugh Ilenda". The signature is fluid and cursive, with the first name "CT" being more prominent and stylized.

C.T. Hugh Ilenda

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