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Comments: I am in full support of CBMBA's Comments as details below.

As the principal proponent and driving force behind the North Valley Trails Project (NVTP), the Crested Butte Mountain Bike Association (CBMBA) is appreciative of the current scoping process and the chance to comment on the proposed plan. The NVTP consists of many of the proposed trails from CBMBA's "Riders Off the Road" trail plan, which is an extension of CBMBA's long-term planning efforts. We are grateful for the effort that the Gunnison Ranger District has put into this project, and we hope that the current NEPA process will further refine the proposal, allowing the Ranger District to incorporate the strongest and most pertinent trail opportunities to provide "the greatest good to the greatest number of people for the longest time" (Gifford Pinchot, the Father of American Forestry and first Chief of the US Forest Service).

GENERAL COMMENTS

CBMBA appreciates the work done by the Interdisciplinary Team (IDT) to further refine the NVTP, but would like to express concerns over two trails being removed from the NEPA scoping process during the IDT refinement, before the public was given an opportunity to comment. CBMBA urges the Gunnison Ranger District to include the Upper Cement Creek to Crystal and Dr. Park Reroute to allow for public comment. These two trails were vetted and approved by the Gunnison County Sustainable Tourism and Outdoor Recreation (STOR) Committee, which is comprised of stakeholders across all disciplines.

CBMBA believes that the Snodgrass Public Trail and the Eccher Gulch #559/Granite Basin #558 trails should not be left out of the NVTP. In CBMBA's outreach to recreation stakeholders, moving Snodgrass onto public land is continually the #1 trail request from trail users. In addition, the 2010 Travel Management process identified the Eccher Gulch/Granite Basin Trail as a suitable non-motorized route. This current NEPA process would have been the ideal place to gather input regarding these two trails and removing them is a missed opportunity for public outreach. CBMBA would like to see action taken by the Ranger District to address access to these highly desirable and sought-after public lands rather than isolating them from the public.

To get to this point in the trail planning process, CBMBA has already conceded multiple contentious trail proposals, including trails that were recognized in the 2010 Travel Management process. We removed the Slate River Trail, East River Trail, Snodgrass reroute, Strand Ridge Trail, and others, and collaborated with many entities to find consensus for sustainable and amenable network trails. We spent time on the ground with wildlife specialists, have poured over maps with stakeholders, have collaborated and mitigated impacts with research use, and held open houses and public meetings to solicit public input. After 4 revisions to the CBMBA plan, and two STOR meetings with extensive discussion taking place regarding each trail, CBMBA's Riders Off the Road plan emerged as a vetted and agreeable plan that was endorsed by the STOR Committee. The STOR committee was created to collaboratively submit unified comments on recreation projects that sustain natural resources and align with community values. CBMBA is concerned that some of the trail modifications and removals in the proposed NVTP are unwarranted and without proper justification, and represent the demands of special use interests instead of multiple use interests.

User experience continues to be a driving force in the value and merit of trails, yet the determinations for "purpose and need" seem to be subjective in the IDT refinement. CBMBA is confident that this scoping and commenting process will better ascertain the desires and needs of the greater public, as valuable public opinions need to be collected and documented to provide feedback for future planning. We hope that a clear and transparent process, where all stakeholders and uses fairly influence decisions, will continue to be a part of the process and supersede special interests. We hope that the outcome of this process is the greatest good for the greatest amount of people.

TRAIL-SPECIFIC COMMENTS

CBMBA appreciates the opportunity to comment on the North Valley Trail Project, and would like to see the Plan move forward with the following modifications on a trail-by-trail basis, as proposed in the "Refinement of the Proposed Action":

#1 - Lake Irwin Road Parallel Trail

CBMBA is in support of the IDT finding for the northern portion of the trail, from FS 826.1a to the Irwin Campground. CBMBA requests that the USFS reconsider the southern portion of CBMBA's original alignment that was labeled "Removed from consideration", which runs from the parking lot at the "Y", parallel to the road, where it intersects with Forest Service Road 826.1a.

Below is the comment from the IDT refinement in regards to the alignment CBMBA proposed.

"The existing Wagon Trail is a sustainable beginner level trail. It seems counter intuitive for this project to decommission a sustainable beginner route. Additionally, this trail presents an existing opportunity to move non-motorized users off busy roads (Kebler and Irwin). Because of this in conjunction with the wetlands concern, the IDT suggests retaining this trail and creating a connector to it for access from the "Y" parking area".

CBMBA does not agree with this assessment and requests further comment and determination from the public. The trail, in its existing alignment, travels further away from the destination (intersection with FS 826.1a), adds more mileage to reach the destination, and is not a sustainable, beginner level trail. Steep grades, difficult switchbacks, and inconsistent grades make the trail un-attractive to users. Users instead take the busy, dusty, and highly traveled road to access the Irwin Campground and Dyke Trail.

The proposed connection to this section of trail as an IDT modification (from the "Y" parking area to the existing trail) may help facilitate access, but it does not address that the existing trail and current proposal will continue to deter recreationists from using that portion of the trail as well as the parking, preferring to drive to overcrowded Lake Irwin, thus defeating the purpose of the trail.

The alignment that CBMBA had originally proposed is closer to the road, more appealing for destination and directional use, and encourages users not to ride the road due to the convenience of the trail versus the old, poorly aligned trail. CBMBA advocates for building the trail parallel to the road, where existing wetland concerns can be addressed and mitigated. CBMBA also advocates for decommissioning the portion of the existing trail described above, which will decrease wildlife habitat fragmentation, support a more intact natural resource area, and eliminate a system route that requires more effort to maintain than it provides actual use or travel.

#2 - Upper Upper to the Brush Creek Trailhead

CBMBA does not support this trail as proposed in the IDT refinement. CBMBA was previously presented with an opportunity to build this trail as proposed here by the IDT, but chose not to because it is an undesirable alignment. CBMBA chose to go through this current scoping process to allow for public comment and suggest a better alignment.

The proposed IDT alignment is unsuitable for 2-way traffic, and will not encourage trail users to move off the road. The proposed IDT alignment also has unsustainable grades, travels directly through wetlands, travels closer to research sites, will not avoid dust from the road, and will lend to poor trail flow due to abrupt changes in grade, steep hillsides to traverse, and ditches and gulleys to navigate. This trail will see high foot traffic, but the proposed IDT trail close to the road will encourage braiding and user created routes due to its high visibility and easy access to the road. See image below - existing user created routes at the road.

CBMBA's proposed trail is a more sustainable and better functioning trail connector to facilitate travel and

recreation needs. It would also provide for a consistent beginner trail, which is highly desired by the general public and youth programming. The CBMBA proposed trail, just 250' from the road up the hillside, on more consistent terrain, provides a better option for foot traffic that will encourage hikers to use the parking areas and the trail itself, rather than creating routes from the road itself to access flowers and potential photo opportunities. The CBMBA proposed trail is also placed above the RMBL research area, and away from sight and reach of the research. CBMBA's proposed trail and the improved parking and access will help discourage improper use and keep users on the designated trail.

Additionally, CBMBA asks that the original alignment be reconsidered with the inclusion of a seasonal closure prohibiting recreational use when ranching permits are in place. This trail will see the most use and travel in the early season, and busy summer season. By including a seasonal closure later in the season, we could provide for the best and most sustainable alignment and avoid conflicts with ranching permits at the same time. Seasonal closures are a progressive means to mitigate impacts and conflicts with a proven success.

CBMBA believes the IDT proposed alignment is not worth the incredible human power that would be required to construct it. We sincerely hope this suggestion is incorporated into the NVTP to provide a more progressive approach to both recreation and shared forest uses. CBMBA and our full-time trail crews would help to implement and manage any seasonal closures if they were implemented.

#3 - Strand Bonus to 409

CBMBA is in full support of this trail as proposed. This trail satisfies the "purpose and need" by providing improved non-motorized network connectivity and enhanced user experiences. This trail will provide a seamless non-motorized trail connection that is highly valued by trail users. We strongly encourage this proposed trail to remain in the project and are grateful to have it included for additional public input.

#4 - Budd Connection - Ambush to Tent City

CBMBA is in full support of this trail as proposed. This trail is a strong example of a "trail hub connection", which is ideal for trail connectivity and decreasing forest impacts by providing parking, bathroom facilities, and access to multiple recreation opportunities.

#5 - Deer Creek to Tent City

CBMBA is in support of the trail that is proposed in this plan, although disappointed that most of the proposed trail (the entire section north of FS 738.2A) was removed before the public was given the opportunity to comment.

The lower section that connects Tent City to NFSR 738.2a will be a useful network connector and CBMBA agrees with the purpose and need of this trail. CBMBA's disappointment in the exclusion of the upper/northern portion is due to the fact that CBMBA worked with wildlife proponents to refine a trail alignment that had the least impact on natural resources and wildlife than our alignment in previous versions of CBMBA's Riders Off the Road plan. The trail that CBMBA had proposed but was removed from consideration was also in collaboration with the Rocky Mountain Biological Laboratory and wildlife proponents, with the goal of creating fewer impacts on natural resources while still improving singletrack trail continuity. The Deer Creek Trail is nearly 10 miles long, and on the Brush Creek side, it ends with a road that must be traveled to reach the parking area. CBMBA's proposed trail alignment attempted to create singletrack from end to end. Additionally, this trail would have provided an excellent opportunity for more beginner trails, something frequently requested by the general public.

#6 - Teocalli Extension

CBMBA is in full support of this trail as proposed. CBMBA appreciates that the IDT also proposed the connector/addition to the existing Trail #409 from Brush Creek Road. CBMBA would like to request that the Teocalli Extension alignment be further refined on the ground and hopes to work alongside the Ranger District to

continue that refinement upon approval of this proposal.

#7 - Reno Divide Road Parallel Trail

CBMBA is in full support of this trail as proposed, and would like the opportunity to continue to be involved in setting the final alignment on the ground. This trail was a late addition to the proposal, and the alignment needs field verification. The proposed trail will greatly reduce user conflicts and provide better user experiences.

#8 - Cement Creek Trail - Upper Cement Creek Trail to Crystal

CBMBA is not in support of the IDT finding that this trail be "removed from consideration". Motorized use in the far reaches of Cement Creek continues to see more users on the road and on trails, and Cement Creek also provides the most accessible routes for connectivity to Taylor Park and Aspen. An increase in popularity in UTVs has compounded existing motorized traffic in this drainage. Because of this increased usage, user conflicts are more prevalent and the need for a non-motorized route is both desired and logical. CBMBA disagrees with the IDT finding, "This section of the road is not busy and does not present a user conflict concern. Due to the remoteness of the road and the lack of 4x4 loop options, it is not expected that this road will become a busy route." This road sees existing heavy motorized use, including routes to Aspen, Taylor Park, and Star Pass, including but not limited to commercial permitted use like the Colorado 500 and others.

CBMBA adamantly disagrees with the IDT finding that "the trail would not add much (if anything) to user experience" and "User experience would not be much impacted (improved) by the addition of this route". The existing Upper Cement Creek Trail, ending at the Hunter Creek Trail, has proven to be a massive complement to the trail network. Users have specifically identified this trail as a unique opportunity to have a beginner level, non-motorized trail, close to the road, and deeper into public lands. This trail is used by all levels of users - from the beginners looking for a unique non-motorized 'out and back' experience, to experts looking to connect multiple trails and drainages in longer trail excursions. The existing Cement Creek Trail has become a highly valued trail experience as a stand-alone trail. The Cement Creek drainage is a recognized recreation corridor, and this trail would further complement the network as a whole and connect existing trails.

The Crystal Peak Trail has become a highly sought after non-motorized trail that connects two identified recreation corridors (Brush Creek and Cement Creek). CBMBA has partnered with the Ranger District over the course of 12 years to recognize a non-motorized connection and access between these 2 drainages, and a non-motorized parallel trail to Cement Creek Road. We ask the District to realize this last remaining piece of singletrack that will be used, minimize impacts on wildlife, and provide the best user experiences from the start (Caves Trail #409) to the end of the drainage (Crystal Peak Trail #583).

CBMBA specifically worked with CPW and wildlife advocates to relocate the proposed trail from the west to the east side of Cement Creek Road to decrease fragmentation of wildlife and mitigate wetlands impacts. Additionally, the initial proposal was supported by the Gunnison County STOR Committee. The terrain on the east side of the road is highly suitable for a singletrack trail, and the proposed trail would intersect with the road just before the Crystal Peak Trail to avoid impacting wetlands near the Crystal Peak Trailhead.

This trail would have an incredibly positive impact on the user experience, and CBMBA sincerely hopes that this trail will be re-considered for inclusion in the NVTP.

#9 - Cement Creek Trail - Lower Cement Creek Trail to Caves

CBMBA is in full support of this trail as proposed and agrees with the IDT finding that it is a "Great fit for the Purpose and Need. This trail would connect the Cement Creek Trail to the Caves Trail making for a continual non-motorized trail up Cement Creeks where users can avoid the safety concerns of the busy Cement Creek Road". CBMBA could not agree more with this comment and hopes that the IDT can utilize this same reasoning and objective approach for the Upper portion of the Cement Creek Trail as discussed in the previous comment for the portion from Upper Cement to Crystal.

#10 - Bear Creek Reroute

CBMBA is in full support of this trail as proposed.

#11 - Dr. Park Reroute

CBMBA is in agreement with wildlife stakeholders that one trail here would provide the best opportunity for wildlife and minimize resource impacts. As an organization that takes pride in sustainable trails and mitigating impacts, we suggest this trail (#424) should be rerouted to a higher point, as the existing trail alignment is unsustainable and transects a low, wet, forested area. There is value and logic in building long-lasting, sustainable trails that can stand up to precipitation and traffic rather than keeping a trail that requires extensive maintenance and continuous "band-aid" fixes. As a 'destination trail', Dr. Park is one of the Gunnison Ranger Districts signature, high profile, and highly sought-after trails. This trail is deserving of a proper sustainable alignment from top to bottom. CBMBA supports exploring other options than what we originally proposed and is amenable to trail alignments that don't impede on the outfitter's basecamp. CBMBA feels that this is an excellent opportunity to plan for a healthier forest future and build a trail in a location and with an alignment that can stand up to the extremely high use the Doctor Park trail will continue to see.

Day Use Areas and Trailhead Parking Expansions and Improvement Additions

CBMBA is in full support of the Day Use Areas and Trailhead improvements. We appreciate the Ranger District looking to make lasting infrastructure improvements that will help manage and maintain forest resources for the future.