Data Submitted (UTC 11): 3/24/2022 3:30:43 PM First name: Daniel Last name: McCoy Organization:

## Title:

Comments: As a regular visitor to Crested Butte and user of these trails, I appreciate 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. I urge 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.

I believe that the Snodgrass Public Trail and the Eccher Gulch #559/Granite Basin #558 trails should not be left out of the NVTP. 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 nonmotorized 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. I 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.

Furthermore, here are my other comments about this action concerning specific trails:

Lake Irwin Road Parallel Trail: I request 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. 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.

Upper Upper to the Brush Creek Trailhead: I do not support this trail as proposed in the IDT refinement. 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.

Deer Creek to Tent City: The lower section that connects Tent City to NFSR 738.2a will be a useful network connector and I agree with the purpose and need of this trail. I am disappointed in the exclusion of the upper/northern portion 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.

Cement Creek Trail - Upper Cement Creek Trail to Crystal: I do not support 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. I disagree 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.

I also disagree 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 I sincerely hope that this trail will be re-considered for inclusion in the NVTP.