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Comments: I support the CBMBA's comments as listed below on the North Valley Trails Draft EA.

#### #1 - Lake Irwin Road Parallel Trail

CBMBA is in support of Option 2. We are grateful for the efforts of the IDT to realize the opportunity to move the south section of the trail to the upper/north side of the road and believe the access to this trail directly from the 'Y' trailhead will be of the best use and service. We support the 'flexibility' of the new trail alignment in order to minimize impacts. We agree that future parking, perhaps on the north side, will also be of great service and set up this proposed action for the best long term success.

While we feel that the Wagon Trail decommissioning proposed (Option 1) would benefit wildlife, riparian, and watershed habitat (revitalize beaver habitat), we consider rationale and assessment presented in Option 2 as the better overall approach in this instance.

#### #2 - Upper Upper to the Brush Creek Trailhead

CBMBA is in support of Option 1 in order to minimize impacts to research, viewshed, wildflower meadows, and noxious weeds. We appreciate the 'flexibility zone' of the proposed action, however we believe the original proposed alignment, as identified here in the proposed action, will:

Avoid sensitive riparian areas closer to the road (flatter terrain),

Will prevent the use of 'social trails' easily accessed by the road to get to wildflower meadows easily,

Avoid historic research areas and keep them out of sight,

Prevent pushing livestock onto the road - as it's slightly further from the road. (Would not happen at all if a seasonal closure was established)

Improve the viewshed by providing a trail to the flowers instead of the user created 'maze' of social trails that establish due to the close proximity to the road.

We are pleased to see language in the assessment regarding seasonal closures and we would be very supportive of a progressive and forward-thinking seasonal closure established in order to avoid conflicts with the grazing permit in place. If the proper trail alignment was decided upon (higher - above the research site), and a seasonal closure was in place, CBMBA would engage the CBCC in order to help educate users and provide a 'boots on the ground' presence in order to help realize said closure.

We are also grateful to see the language in the assessment around a 'wider' trail/tread for the proposed action.

This trail is very close to the Town of Crested Butte, and the Brush Creek trailhead is a very popular point of access that will be of great use to non-motorized users. In order to provide the best experiences for this trail, the proposed wider tread width will best serve the uses in addition to getting 'Riders Off the Road'.

Additionally, we would like to provide and install signs on the proposed trail that say, 'Sensitive Research - Stay on Trail' - in order to help mitigate impacts on the research, and also help to prevent social trails from occurring during wildflower season.

We feel the alignment we originally proposed will provide for the best experiences, proper non-motorized use, prevent pushing livestock on the road, avoid historic research areas, and with a seasonal closure employed, this trail connection would be of great benefit to the trailhead and the trail network in this 'close to town' and high-use area.

#### #3 - Strand Bonus to 409

CBMBA is in support of Option 1. Connectivity, and the seamless connection of network trails is a highly sought after experience. Although the existing road is not highly used, the 'need for proposal' (p. 6) specifically justifies the need.

Objective: Provide better 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 by:

Connecting existing trails,  
Realigning non-sustainable routes, and  
Designating proper trail access points and trailhead infrastructure.

In addition, several 'headcuts' causing erosion in the proposed trail alignment will be better served with a trail crew (CBCC) that can mitigate those issues. (p. 70).

Being close to the Town of Crested Butte, and in a well-used trail corridor, we feel this trail meets the 'need for the proposal'.

#### #4 - Budd Connection - Ambush to Tent City

We are in support of Option 1. In addition to the signs described in #2 (Upper Upper to Brush Creek), CBMBA would like to provide and install signs on this proposed trail that say, 'Sensitive Research - Stay on Trail' - in order to help mitigate impacts on the research sites nearby, prevent social trails from occurring during wildflower season, and from users trying to access the river.

#### #5 - Deer Creek to Tent City

CBMBA is in support of Option 2. Inasmuch as we would like to continue our efforts for seamless trail connectivity and removing trails from roads in lieu of singletrack, we agree with the rationale found by the IDT and are pleased with the experiential and safety improvements on the proposed lower section of the trail, to connect from Tent City up to the Teo/Deer Creek 'Y' (NFSR 738.2a). We feel this lower section, in addition to the Tent City enhancements, will provide for better management, access, and mitigation of impacts in the Brush Creek corridor.

#### #6 - Teocalli Extension

CBMBA is in support of Option 2. We are grateful for the work of the IDT and the inclusion of an existing user created trail, and agree with the rationale for this option. We also appreciate the 'flexibility zone' for the connection of the terminus of Teocalli Ridge Trail (NFST 557) and 409/409.1a.

We feel there is an 'apparent safety driver' for this trail, as high speeds are a concern with a steep, loose, and curving existing alignment on the road (NFSR 738) and the multiple uses the road is designated for. Increasing use of UTVs, alongside motorized and non-motorized use, will make this extension a valuable and pertinent addition to the network aligned with the 'need for the proposal'.

#### #7 - Reno Divide Road Parallel Trail

CBMBA is in support of Option 1. Increased use on Reno Divide Road, from non-motorized to motorized, to UTV and other high clearance vehicles, is a very evident and serious safety driver. It's only a matter of time before a nasty collision takes place, and many poor experiences and confrontations have already been realized on this road. Separating the uses by creating a parallel trail is a much-needed improvement to the network and indeed suits the 'need for the proposal'.

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

CBMBA is adamantly in support of Option 1 on this particular trail proposal. There is not a better example of a more needed trail in the network that fulfills the 'need for the proposal', minimizes impacts (specifically with the

shortening of the proposed trail before it hits the major riparian area near NFST 583/Crystal Peak Trail), better prevents habitat fragmentation (moving the trail to the East side of NFSR 740), and not only gets 'Riders Off the Road', but is the final piece of trail connectivity from one end of the Cement Creek drainage to the other.

Existing conditions state - 'This is a beautiful area that promises a lot of opportunities for exploration by intrepid visitors willing to press into the higher elevations of the canyon.' (p. 44).

Independent of the experiential, beginner/intermediate, and connectivity needs, this trail will be a shining example of proper recreation access as it connects one end of the drainage/corridor to the other, by separating motorized and non-motorized uses while still mitigating fragmentation and impacts by remaining close to the existing road. Users long for this kind of trail experience where they can reach those higher elevations of the canyon while remaining close to the road and on more beginner level terrain. Drainages can be connected, upper reaches of the trail network can be accessed, and all non-motorized users can explore those higher elevations of the canyon via human power.

Utilizing the CBCC, natural resource concerns and impacts will be further mitigated and a means to plan for future usage will be addressed. 'However, use of the trail system is predicted to continue to grow, independent of this project.' (p 45)

Ending the proposed trail one mile below the intersection of NFST 583 (Crystal Peak Trail) will avoid the major impacts into riparian and watershed areas of concern. Below that, trail armoring and hardening will adequately mitigate the 'several small wet areas and drainages', and minimize view shed concerns by remaining close to the road.

With continued local population growth, visitation growth, and concentrated use impacts, this proposed trail makes good sense and fulfills the 'need for the proposal'. UTVs and other high speed motorized use continues to increase in this corridor. There is a very evident safety driver for this proposal, and there is a very apparent solution - the approval of Option 1.

#9 - Cement Creek Trail - Lower Cement Creek Trail to Caves  
CBMBA is in support of Option 1.

#10 - Bear Creek Reroute  
CBMBA is in support of Option 2. We appreciate the findings of the IDT and agree with the rationale to avoid the road and minimize conflicts with administrative operations.

#11 - Dr. Park Reroute  
CBMBA is in support of Option 1. Besides years upon years of continued upkeep and maintenance on an area of the trail that will never be 'sustainable', in our outreach to stakeholders in this trail process, wildlife advocates brought to our attention the value in giving something back.

Our proposed trail, on higher ground and away from sensitive riparian areas, provides an improvement to the resource. In addition, the decommissioning of the old route, along with the 'spur' NFST 424.1a, would provide for better wildlife habitat, and less fragmentation. We feel this proposed route (Option 1) makes the most sense and is the most ecologically responsible thing to do.

We understand the existing use and permittee needs on the 'spur', but do not feel that their use will be hindered if this trail is decommissioned as a system route. Many user created routes splinter off from the spur, mainly from outfitter and hunting season use already.

We see an excellent opportunity to improve the resource by creating one sustainable trail (1.2 miles) and

decommissioning an existing 3.4 miles of trail (1.2 old/current Dr. Park trail + 2.2 spur trail). This will result in a triple win situation for the resource. It creates less trail density, helps with livestock management (along the old trail), and places the trail onto drier, more stable soils that will provide for less negative impacts on this high use route.

#### Day Use Areas and Trailhead Parking Expansions and Improvement Additions

CBMBA is in full support of Option 1 - the Day Use Areas and Trailhead improvements at Brush Creek Trailhead, Tent City, and Walrod Parking expansion. We appreciate the Gunnison Ranger District looking to make lasting infrastructure improvements that will help manage and maintain forest resources for the future. These areas are already overcrowded and limited in capacity. These improvements will not only prevent resource damage, but serve existing uses and needs, as well as provide for 'hubs' to encourage proper use and access. They also serve to provide for kiosks and information, along with bathrooms.