



To: Amy Sharp, Sparrow Trails  
From Robyn Cascade, Great Old Broads for Wilderness  
RE: COPMOBA/RAT Regional Trails Conceptual Design  
Date: June 28, 2021

Thank you for the opportunity to comment once again on the final draft of the Ouray Regional Trails Conceptual Design as presented at the June 8, 2021 public meeting. In addition to the comments submitted by Sallie Thoreson, I contribute the comments below from Great Old Broads for Wilderness.

We appreciate the research, ground-truthing and attention to detail that has brought this conceptual design to fruition and wish to reiterate some concerns expressed throughout this process in writing and during stakeholder and public meetings.

First and significantly, we ask that Sparrow Trails, Sweet Sustainable Single Track, COPMOBA and RAT acknowledge that the online survey you created was biased in several ways that skewed the data toward more trails, more development and increased infrastructure and did not consider uses such as wildlife watching, creative endeavors, connections to nature and personal rejuvenation. Our local trails are used and appreciated by many diverse users - not just by traditional recreational users for whom it appears the survey was targeted. Here are some previous comments summarized:

- As mentioned above the very first question of the survey "What is your primary purpose of accessing area trails?" does not include diverse options in the multiple choice and there was no "other" to write in one's answer.
- The question "Which improvements are most needed in this area?" does not allow for the answer "none" or "other" (with a write-in option) and "Parking" was not an option.
- The question "Which types of trailhead amenities are important in this area?" also did not include the option for "none" or "other" Parking does not appear in the list either.

We also note that to our knowledge, no feedback was received or deliberately sought from equestrian users or outfitters though our organization attempted to engage them.

As for specific locations referenced on maps A, B, & C, we offer the following comments and recommendations:

Ironton Area (A):

- Thank you for removing some trails proposed in the first draft.
- This area is home to resident Canada Lynx (an endangered species) as well as moose, elk, bear, deer, snowshoe hare among others. The Ironton Fen is a unique habitat with exceptional botanical and wildlife values. No new trails should be constructed in this area that negatively impact this critical habitat. No winter mountain biking should be allowed in this area.
- Given the proposed trail's crossing of McIntyre Gulch Rd., Hayden Trail and Richmond Trail, we remain deeply concerned about the ability to of mechanized and motorized users to purposefully or accidentally access these routes from the proposed trails. We are aware enforcement of closures is challenging and compliance is sometimes limited. No bikes or motorized use is allowed on Hayden and Richmond Trails and the gate to McIntyre Road is locked to prevent access, so bisecting these routes possesses challenges and concerns, we hope you will address in your final design.
- The most recently proposed trail to the south of Ironton into the alpine toward Red Mountain Pass has not been described adequately to comment nor vetted appropriately among stakeholders. We oppose additional trails in sensitive alpine ecosystems. One possibility might be to have a trail aligned with the currently upgraded SMPA power line, though we have not fully reviewed that option to determine if the course is appropriate for recreation. Nevertheless, a trail along a currently disturbed route is preferable to a new trail.

#### Dallas Trail (B):

- We appreciate the removal of trails in the Colorado Outdoor Recreation and Economy (CORE) Act currently being considered in Congress for addition to the Mount Sneffels Wilderness.
- There is no need for a new trail at the CR 9 access point. We recommend using the current CR/USFS road to access the Dallas Trail at this site.
- Additional use or need for parking at the Blue Lakes Trailhead to access the Dallas Trail should be strongly discouraged. The area overcrowded and resource damage in this area is significant. We suspect you are aware of the "Save the Blues" campaign due to overuse. The parking area and outhouse cannot accommodate further visitation.
- Blue Lakes Rd and CR 5 Proposed #1 & #2 are critical elk summer range. All three should be removed from your conceptual design without exception.
- During the final public meeting, the representative from Wolf Cattle Company spoke about the many trespass issues they face as a livestock operation and private landholders. We encourage your team to give these concerns deliberate attention in order to minimize potential future conflicts in this area and any other areas with similar issues.

#### Owl Creek Area (C):

Thank you for removing some of the originally proposed new trails in this area. We appreciate your integrating the input from our organization and others.

The Nate Creek Trail should only be open to bikes when open to motorized use July 4-Labor Day.

A lot of loop options already exist in this area south and we recommend the use of Old Owl Creek & Spauling rather than creating the new Owl Creek Concept. We don't have sufficient information to adequately assess NC Climb #1 & #2, but we remain skeptical of the need for new trails across this terrain that is currently unfragmented and home to numerous wildlife species. Your map shows them as current routes needing improvement, however many of our members hike this area regularly and are not aware of these routes, so they are not obviously visible and hopefully have returned to somewhat of a natural state.

Thank you again for welcoming our constructive feedback, and we look forward to sharing the trails in Ouray County with multiple users. Please don't hesitate to contact me if you have need for additional information.