



# West End Trails Proposal

Naturita and Nucla, CO Recreation Asset Review:  
Trail Opportunities  
Naturita, CO; Nucla, CO; Montrose County, CO



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# Naturita / Nucla Recreation Asset Review: Trail Opportunities

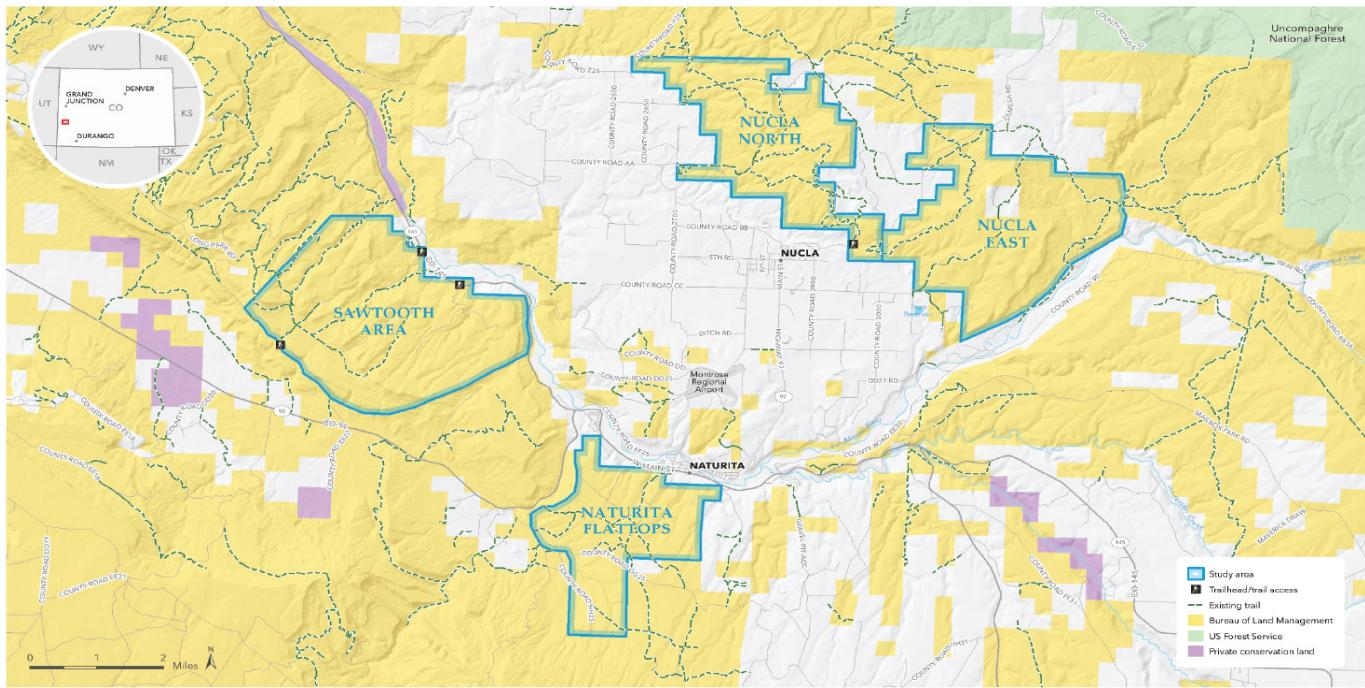
## Project Overview

Montrose West Recreation, a local non-profit, partnered with the Telluride Foundation, the West End Economic Development Corporation, the Trust for Public Land, and Colorado Parks and Wildlife to engage Public Land Solutions to facilitate a stakeholder process to determine the need and feasibility of new trail development in the Nucla / Naturita area.



## Introduction

Communities across the west are facing challenges associated with reliance on a single economic driver. In most cases, this is a reliance on the extraction industry<sup>1</sup>, and when those facilities close, the cities and towns near those closures face an economic crisis. As local and state governments work to mitigate the effects of losing an important source of revenue, research is showing that a well-planned pivot<sup>2,3</sup> to other economic sectors can help a community transition.



## Study areas

WEST END TRAILS MASTER DEVELOPMENT PLAN, MONTROSE COUNTY, COLORADO

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Naturita and Nucla, CO are in a prime location for benefitting from the recreation economy. The scenic natural spaces surrounding these towns serve as perfect venues for the development of recreational opportunities that would attract visitors and businesses to the West End Region. Public Land Solutions, in concert with the West End Economic Development Association, have gathered community input from stakeholders of all types to create the following proposal for developing and enhancing trails to improve the recreational assets in this region.

## Background

As part of an agreement to curb air pollution, Tri-State Generation and Transmission announced a plan to close the Nucla Station power plant and New Horizon Mine by 2022. The early closure<sup>4</sup> at the end of 2019 left the community without a solid alternative for local employment. To help support the community through this transition, Tri-State has committed to providing \$500,000 in community support over five years. Subsequently, the Craig Station and Colowyo Mine in Colorado will also be retired by 2030<sup>5</sup>.



The Nucla Station power plant closed before it's 2022 projected date in late 2019.

## An Example of a Recovering Community: Fruita, CO

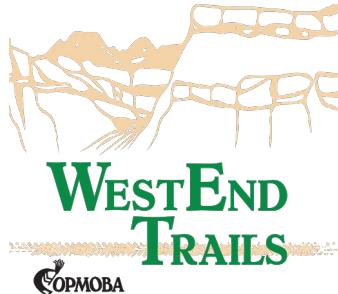
While many communities consider and attempt to benefit from recreation on nearby public lands, success depends on reaching critical mass by creating a complementary product mix of outdoor activities that do not compete with or detract from each other. And in each case enough variety and quantity must be available to meet the needs of visitors, residents, and businesses. For example a single 10-mile biking trail or a few miles of improved river walkways will not be enough to bring significant revenue flows. Each recreation asset, a trail, a river, a climbing area--must be substantial enough to attract the targeted user group. A general rule of thumb suggests that communities need a minimum of 2 to 3 days of a particular activity to attract visitors for overnight stays, or attract quality of life recruits to move their businesses or plan their retirement in that community.



For example, Fruita, a community on Colorado's Western Slope<sup>6</sup>, has invested in enhancing recreational assets, and has consciously chosen to rebrand itself as an international mountain biking destination with the completion of over 300 miles of trails<sup>7</sup>. Through this significant investment in trails, the citizens of Fruita successfully shifted their focus away from a single economic driver to diversify their region and increase sustainability by attracting other economic sectors.

### Long Standing Economic Development Efforts in the West End

The West End Economic Development Corporation, Colorado Plateau Mountain Bike Trail Association, West End Trails Alliance, and Telluride Foundation have been instrumental in regional recreation development. The West End, which encompasses six towns within Montrose County, draws 4,600 visitors each year<sup>8</sup> and has unique opportunities for expansion in several employment sectors, one of which is recreational tourism. Expanding recreational tourism would provide the West End with a healthy and necessary diversification of the economy. According to the Economic Development Action Plan: West End of Montrose County, Colorado published in 2012/2013, the West End has recognized it's need to pivot to alternative economic opportunities stating, "predominance of public lands, roads and trails combined with the visible history of the area makes the West End rich with recreational opportunities, but capitalizing on these assets has proven to be a challenge."<sup>9</sup>



## Naturita / Nucla Recreation Review: Current Outdoor Recreation Assets

Montrose County boasts incredible opportunities for outdoor recreation including hunting, climbing, hiking, and mountain biking. The West End area surrounding Naturita and Nucla offers these attractions close to small, intimate locales that create a sense of adventure.

**Hunting:** Colorado Hunting Units 61 and 62, which span a large area managed by USFS and BLM, offer opportunities for hunting elk and, to a limited extent, deer<sup>10</sup>. There are several outfitters in the area who offer trips into these units



**Motorized & OHV:** Many roads designated for OHVs criss-cross BLM<sup>11</sup> and USFS lands. In particular, the Rimrocker Trail<sup>12</sup>, Thunder Trails System<sup>13</sup> and the well-known Paradox Trail<sup>14</sup>. In addition, there is an important opportunity to utilize the signage project (mentioned below) to establish key motorized routes for visitors, as motorized recreation and rentals will be an important contributor to the area's recreation economy.

**Fishing:** Local fishing areas offer Walleye, Green Sunfish, and Cutthroat Trout among others. There are over twenty<sup>15</sup> fishing spots within thirty miles of Naturita and Nucla, in the Miramonte and Buckeye Reservoirs, and along the San Miguel and Dolores Rivers.



**Paddling Sports:** The Dolores and San Miguel rivers offer additional recreation opportunities including kayaking, rafting, and stand-up paddle boarding (SUP). The Dolores River Canyon is known for its "Snaggletooth" class IV rapid and incredible scenery, including pueblo ruins. Similarly, the San Miguel River offers dynamic kayaking experiences and class I-III rapids.

**Climbing:** Known as the "Wild Wild West" to rock climbers, this area lies west of Naturita on sandstone, offering everything from short crags to pinnacles to long sandstone cracks. Of particular interest to climbers are the Red Rocks area and Atomic Energy Crag. Most of the routes are bolted, single pitch climbs between 80-100 feet. The Red Rocks area is south-facing, so it's a good winter climbing area although spring and fall are good times to climb here as well.

**Mountain Biking:** According to the West End Trails Alliance ([www.westendtrails.org](http://www.westendtrails.org)), there are thirty inventoried trails across the western portions of San Miguel and Montrose Counties, as well as the southwestern part of Mesa County. The challenge is that these trails are spread out in a wide geographic area and are not concentrated enough to bring revenue to any one community in the region. They do create an interest in the area, however, and help showcase the diverse natural features and landscapes the West End has to offer. These include the Shamrock and Paradox Trails, as well as the Nucla Range Loop system. The Paradox trail in particular is growing in popularity with bike packers<sup>16</sup> looking for multi-day trails.



For the purposes of this project, which was funded by a CPW trails planning grant, research and public workshops were focused on hiking and mountain biking trails only. The goal is to improve the trail offerings nearest to the Nucla and Naturita communities to create a tangible demand in these categories. Stacked loops with specific trailheads are suggested below. Well marked and well named trails can be marketed to interested user groups to assist in achieving the area's economic diversification goals.

## Naturita and Nucla Trail Opportunity Stakeholder Workshops

To meet the needs of the community and all stakeholders, in-person stakeholder workshops were held at the Nucla First Park Community Center on September 10th and 11th to discuss trail opportunities. These workshops were well attended with 34 attendees on the 10th and 31 attendees on the 11th.

The workshops utilized a map based discussion to focus individual comments on specific areas. Montrose West Recreation proposed four areas to be considered for trail development. Each area was discussed in turn, and attendees at the workshop were encouraged to provide details of activities and land uses in each area. Comments were collected for each type of stakeholder who attended regarding each of the four areas. By focusing directly on the map and working to insure that comments from all types of stakeholders were considered, the meeting remained focussed on the trail proposals and the issues associated with them.



After the workshops, additional conversations were had via phone and in person to explore a variety of issues that were raised at the workshops. These included several aspects of the project such as: Key **Wildlife** Locations and Concerns, **Ranching** and **Grazing** Concerns, **Hunting** and **Angling** Concerns, **Economic Development** Goals, **Camping** and Trailhead Options and Needs, **Private Landowner** Considerations.

The goal of this work was to balance the needs of all stakeholders with regard to hiking and mountain biking trails in the region. In order to overcome the challenges of capitalizing on recreational assets in the region, a heavy emphasis was placed on stakeholder involvement. Integrating the input of the stakeholders listed below has enabled this process to gain broad support among the community.

**Ranching and Private Land:** Extensive discussions have been focused on ensuring that private landowners and ranchers will not be affected by trails in this proposal. None of the proposed trail regions will impact private land.

**Hunting:** Represented by Backcountry Hunters and Anglers, the hunting interests in the region requested that Saucer Basin and Hieroglyphic Canyon be pulled from the proposal. This has been done to lessen any impact on hunting opportunities.



**Motorized Recreation:** Motorized recreation in the area would benefit from marking routes as beginner, intermediate, and advanced to provide for a variety of experiences. Marked and promoted routes will support local rental businesses and add to the area's product mix.

**Wildlife Habitat:** Wildlife considerations were explored extensively in creating this proposal and trail areas were significantly adjusted, leaving the Nucla North and East areas entirely out of the proposal. The Sawtooth area, Naturita Flat Tops, and the connecting trail from Camp V are the most viable areas as will be outlined in the proposal.

While the focus of this project was new trail opportunities, there is an opportunity to do a similar analysis and public outreach for all of the activities in the region, and this work is recommended to create a well rounded product mix for the region. Hunting, motorized recreation, fishing, and climbing all have additional potential to bring revenue flows to the area, through enhancing the brand and profile of these two communities.

#### One such similar effort includes the **West End Signage Project:**

Currently, very few of the existing trails and routes in the West End are signed. Existing routes maintained by the county remain the exception but are not designed or intended to act as way-finding for outdoor recreational usage. In March of 2020 Montrose County was awarded a GOCO signage grant that will establish area kiosks with trail and way-finding signage along many existing popular routes already used by outdoor recreational users including hikers, mountain bikers, OHV and other motorized users.

The Sawtooth Area in particular has many miles of unmarked two track trails in various degrees of condition left over from the uranium mining period, which ended almost forty years ago. A proposal has been submitted to the BLM - UFO outlining this project with over thirty existing routes identified for potential signage. The BLM is currently assessing those routes and plans on performing field inventories before giving approvals for signage.

## **Recreation Asset Enhancement: West End Trails Proposal**

### Specific Proposals for the Sawtooth ERMA and the Naturita Flat Tops Area

**Summary:** The initial trail proposal considered by the stakeholder groups included four areas: Nucla East, Nucla North, The Sawtooth, Naturita Flat Tops.

Nucla East and Nucla North: These two areas were reviewed extensively and wildlife considerations were analyzed. Seasonal closures were considered to enable trail opportunities in these areas, but ultimately both areas have been withdrawn from the proposal to accommodate wildlife and private land concerns.

The Sawtooth Area: The area designated as "Sawtooth" (See below SAWTOOTH DETAIL), located northwest of the town of Naturita, provides the best opportunity for immediate development of trails, and has been designated as a Extensive Recreation Management Area (ERMA) in the recently updated Resource Management Plan (RMP).

Naturita Flat Tops (See below NATURITA FLAT TOPS DETAIL), an area located immediately south of the town of Naturita, is also an important trail area. In the Naturita Flat Tops recreation development will be confined to the north rim and drainages to prevent impacting wildlife further south.

For both areas detailed below, the Sawtooth and Naturita Flat Tops, sensitive areas have been identified by CPW and future trail designs will work to avoid these, as well as any other areas of concern identified by the NEPA process. For a detailed wildlife analysis, see Appendix A.



**SAWTOOTH DETAIL:** The Sawtooth area, characterized as an uplift and by a large amount of exposed slickrock, is the most advantageous in terms of developing new recreation opportunities while also mitigating wildlife impact and using in situ surface disturbances (roads, social trails, grazing, etc.). Sawtooth lends itself to stacked single track loops and year-round accessibility. Regional topography, and the BLM RMP, allows for the expansion of the originally proposed Sawtooth region to include the entire uplift to the Dolores River. Trail design considerations will include:

**Trail Placement:** Trails will take advantage of existing disturbances whenever possible while providing compelling mountain biking and hiking experiences. Trails will maintain a half mile buffer along the San Miguel River corridor.

**Climbing Opportunities:** Access to existing and new climbing areas will be accommodated in trail designs.

**Motorized Recreation:** Existing open routes will remain open to motorized access.

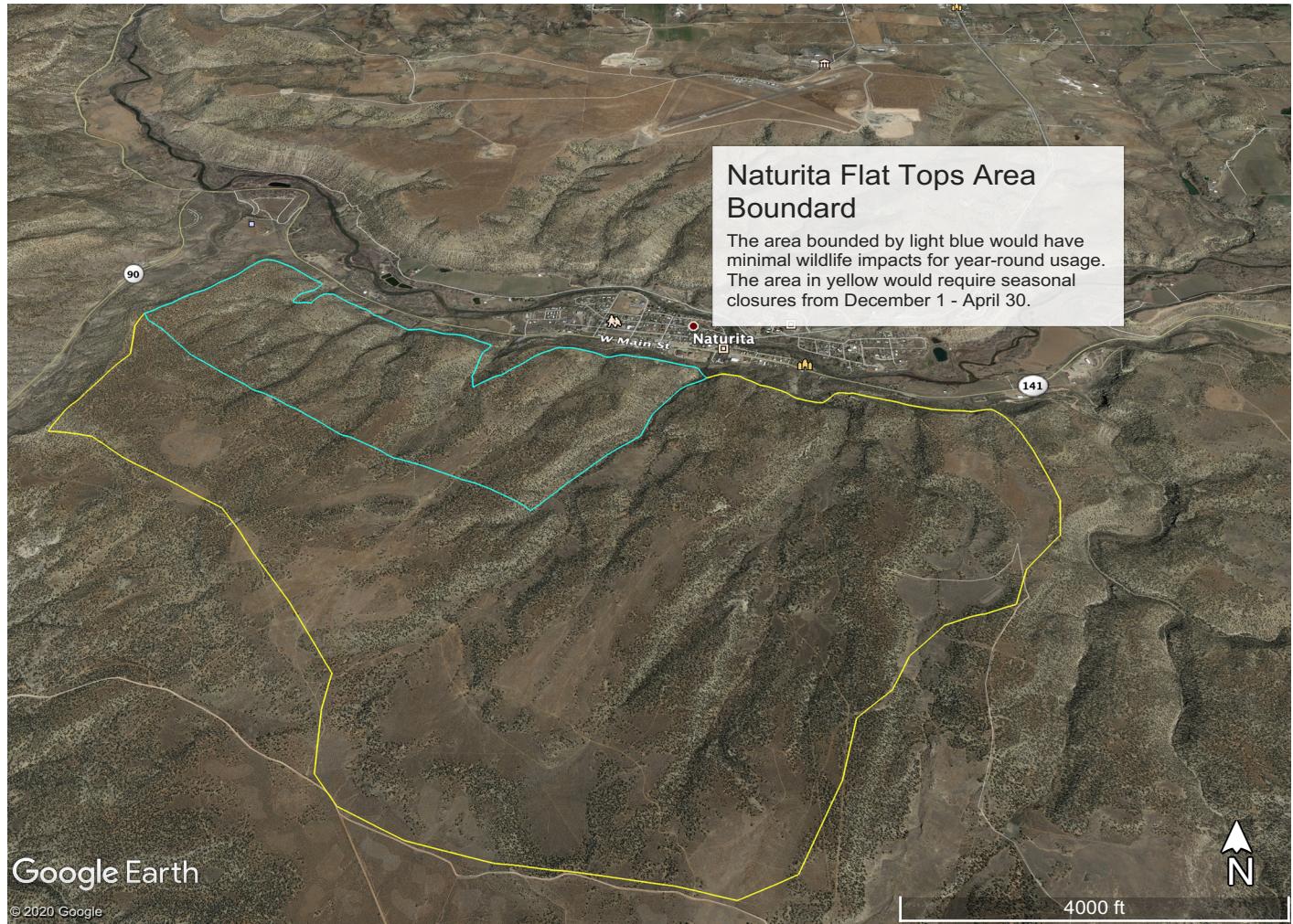
Saucer Basin, because of its lack of historic development and relative solitude, could serve as the viewpoint or destination of a northern trail system. Short connector trails to existing trails are the only trail development being considered in this area. For conceptual trail mapping, see Appendix B.



**Trail Head Placement:** Highway safety and availability of parking will be important, along with access to stacked and connected loops that provide beginner, intermediate, and advanced riding options. Highways 90 and 141 offer limited but good access points to the entire area. CPW has stated trailheads along 141 at the northern most boundary line would have minimal wildlife impacts, as well as a trailhead at the end of a well used county road off Hwy 90. Camp V, located southeast of the development, would also offer access by way of a connector trail from it's north trailhead. Other options include utilizing BLM and county roads from 141 to access interior trails. Please see map below for details.



**NATURITA FLAT TOPS DETAIL:** The Flat Tops area offers a more localized, front country recreation development opportunity that is highly convenient to the town of Naturita, thus providing a more direct connection for economic development opportunities related to recreation. There are two boundaries for this region to address wildlife concerns. As noted on the map, the area bounded by light blue will have year-round access, while the area bounded by yellow will require seasonal closures from December 1 - April 30. Connectivity to the Sawtooth Area trails will be possible with a planned public access agreement through the privately owned Camp V area. This area would also provide much needed beginner and beginner to intermediate trail riding experiences.



The idea for this area is that a central trail head in town and another at Camp V two miles to the west, would provide access to a stacked loop trail system that provides a variety of trail experiences for both hiking and mountain biking directly from town. In theory, a very small parking area would be required as most trail users would be able to ride or walk from their in town accommodations or homes.



## **Executing the Proposal: Next Steps**

After a final community review process, this proposal will be presented to the Montrose BLM for their consideration. The proposal is compliant with the current BLM Resource Management Plan for the region.



## **Infrastructure**

**Campgrounds & Dispersed Camping:** Continuing the discussion regarding campground proposals, Camp V and in-town accommodations currently provide the most accessible lodging. Bedrock Campground and Uravan Ball Campground have designated camping sites along the Dolores River and at the northern corner of the Sawtooth Area. As trail development continues, areas within the Sawtooth area may be approved for dispersed camping and trailhead parking lots for expanded camping use. An excellent example of a county/BLM partnership is the development of campsites near Moab in Sand Flats Recreation Area and Kane Creek, with minimalist toilets and campsite designations. This has been successful in managing the large number of visitors to the area and subsequent waste.

**Trail & Facilities Maintenance:** Local and regional trail groups have pledged to mobilize volunteer groups to maintain and improve trails as seasonal effects may alter trail access and use.



## **Letter of Support: Montrose County, CO; Board of County Commissioners**



**MONTROSE COUNTY  
BOARD OF COUNTY COMMISSIONERS**  
317 South 2nd Street  
Montrose, CO 81401  
Phone: 970-249-7755  
Fax: 970-249-7761

June 2, 2020

BLM-UFO  
2505 South Townsend Avenue  
Montrose, CO 81401

To whom it may concern,

Montrose County, Colorado would like to voice its support of the West End Trails Proposal.

Local interest in diversifying regional economic drivers through increased outdoor recreation defines the importance of these types of projects. With the Rimrocker Trail and recent approval of the Signing the West End Grant, the project would further build and diversify recreation opportunities in this distinctive region.

The proposed areas provide several unique opportunities that speak to the merits of the proposed project. Topography and geography create desirable features that mirror trail systems in communities that have successfully transitioned from economies based on minerals exploration to outdoor recreation. The locations of the proposed trail systems provide remote recreation opportunities to visitors but are close enough to the towns of Nucla and Naturita to provide short-term economic benefits to the communities.

This project stands to diversify the recreational opportunities in this region, and we hope that our support will be taken into consideration as the project moves forward.

Sincerely,

Keith Caddy  
Chairman

Roger Rash  
Vice-Chairman

Sue Hansen  
Commissioner

## Letter of Support: Town of Naturita, CO; Mayor John Riley Sr.

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P.O. Box 505  
222 East Main St.  
Naturita Co. 81422



Phone: (970) 865-2286  
Fax: (970) 865-2815  
Email: thnaturita@unitecwireless.com

May 30, 2020

Bureau of Land Management  
Uncompahgre Field Office  
2505 South Townsend  
Montrose, CO 81401

Re: West End Trails Proposal

To Whom It May Concern,

The Town of Naturita supports efforts by citizens and groups to improve our economic conditions here in the West End of Montrose County. The West End Trails Proposal is just such an initiative which, if implemented, will have a far reaching and positive impact on our towns.

Naturita lies in close proximity to BLM lands both to the south and to the north with good access points in each direction. The access to the south, where new trail development is proposed, will create an attractive recreational asset for the town, allowing visitors and residents to enjoy this unique area which sits immediately above our town. We are also excited about the potential cooperation from Camp V to the west of Naturita for offering public access to the trails through their property.

We would like to note the lack of available trailhead parking space where the proposed trail enters from town property near West 2nd Ave and the visitors center. Although we do not anticipate an immediate problem, it is an area we will have to examine and to ensure trailhead availability and safety.

There are other potential access points from town on other properties which we hope will be examined as well when the trail design phase is implemented.

The town also wishes to express our desire to keep these trails open for year round usage. There are often days even during the winter months when the lands above town are dry enough to hike or bike without causing surface damage. Also, the local wildlife staff has indicated that the area where trails are being considered, will not adversely impact large game winter range found further to the south.

The Town of Naturita wholeheartedly supports this trails initiative and stands ready to assist in its creation wherever it can.

Sincerely,

John Riley Sr.  
Mayor, Town of Naturita

## **Letter of Support: Town of Nucla, CO; Mayor Richard Craig**

320 Main Street  
P.O. Box 219  
Nucla, CO 81424-0219



Town Council  
Richard Craig, Mayor  
Paula Brown, Trustee  
Antoinette (Toni) Carter, Trustee  
Mark Jones, Trustee  
Lucas Johnson, Trustee  
Penni Berry, Trustee  
Gayland Thompson, Trustee

(970) 864-7351  
(970) 864-7600 fax

May 19, 2020

Greg Larson - Field Office Manager  
Uncompaghre Field Office  
Bureau of Land Management  
2505 South Townsend  
Montrose, Colorado 81401

Re: West End Trails Proposal

Dear Mr. Larson,

The Town of Nucla has been closely watching the process for the creation of a West End Trails Master Development Proposal. We understand that the Colorado Parks and Wildlife is heavily involved in shaping this proposal based on its large scale and potential impacts to our surrounding public lands. Our experience with our own local trails efforts has been positive while we have seen a steady increase in various users of the Nucla Range Loop System and the Paradox Trailhead parking area. With Nucla lying in such close proximity to the public lands, it makes sense to develop trails and access points to encourage more healthy recreational use of those lands. The economic benefits of that increased usage are already apparent.

The Town of Nucla wholeheartedly endorses and supports the creation of a well-designed stacked loop system trails close to our West End communities. Our fragile economic situation needs all the help it can get. Creating these trails will greatly benefit our area while encouraging visitors and residents to stop, explore and enjoy the many natural wonders which the West End features. This formula of trail development has proven successful in many other financially challenged communities. Our only complaint is that the Nucla North and Nucla East sections were removed from the proposals, we believe these sections to be just as important and wish you would reconsider.

Thank you for considering the West End Trails Master Development Proposal and we look forward to assisting with this project in any way we can.

Sincerely,

A handwritten signature in blue ink that reads "Richard Craig".  
Richard Craig  
Mayor

## **Letter of Support: West End Trails Alliance; John B. Stewart, President**

**West End Trails Alliance  
Box 281 Nucla, CO 81424**

31 May 2020



BLM-UFO  
2505 South Townsend  
Montrose, CO 81401

RE: West End Trails Proposal

To Whom It May Concern,

West End Trails Alliance members have worked closely with the Colorado Parks and Wildlife, Telluride Foundation, Montrose West Recreation and Public Land Solutions in the creation of this latest trails proposal. Many hours of direct face to face and remote meetings have taken place over the past nine months addressing issues around wildlife and grazing considerations. The original proposal focused on four areas outside the towns of Nucla and Naturita which now looks very different from the original. The inclusion of the Sawtooth Area Extensive Recreation Management Area (ERMA) was a huge boost to our efforts to create a world class trail system in the West End.

Our comments are as follows:

1. Efforts were made to address big game winter grazing issues in order to create areas for trail development which would not require seasonal closures. All parties agreed that seasonal closures were not ideal and should be avoided if possible. We would like to see that remain a top consideration when placing trails.
2. The Naturita Flat Tops Area remains important for the economic benefit of the Town of Naturita due to its close proximity to the proposed trail system and for its good public access from town to that area. There is also a great opportunity to partner with private property interests (Camp V to the west) for more public access to that and the Sawtooth Area.
3. We believe a continuous trail from the Naturita Flat Tops area to the Uravan Ball Park area would be beneficial and should remain a goal for this proposal. The connectivity it would create to other trails in the area ( Shamrock, Red Canyon and Paradox) would only add to a positive West End experience for public lands users.
4. Our [westendtrails.org](http://westendtrails.org) website has seen a noticeable uptick in usage during the pandemic shutdown, while locally we have seen a large influx of people from out of the area dispersed camping throughout the West End. We believe this proposal needs to address the need for low cost sanitation facilities, camp amenities and their potential locations to address the increase in public lands usage we are currently seeing.

5. All new single track trail designs should keep motorized and non-motorized users separated as much as possible to avoid user conflicts and to enhance the experience of all trail users.
6. More trail access points need to be designated along Highway 141 south of Uravan. Currently there are only two in the proposal while there is opportunity for two more near mm 67 and 69. Both have existing two track coming to Hwy 141 or close to.
7. WETA welcomes the opportunity to work with the BLM and other trail users to recommend existing two track and other lesser known trails for inclusion into an overall trail system inventory while recommending routes for closure.
8. The lack of way finding signage throughout the West End remains a concern and needs to be addressed. When planning new trail development, signage needs to included in all proposals.

The West End Trails Alliance wants to extend our thanks to all involved in this complex yet potentially beneficial undertaking. We realize it is a long and expensive project yet a necessary one if the West End communities are to add outdoor recreation to their economic mix.

Thank you for considering this proposal.

  
John B. Stewart

John B. Stewart, President

West End Trails Alliance

## **Comment Letter: San Miguel County, CO; Board of Commissioners**



## **BOARD OF COMMISSIONERS**

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HILARY COOPER KRIS HOLSTROM LANCE WARING

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May 29, 2020

Public Land Solutions

Submitted via internet comment form: <https://publiclandsolutions.org/westend/>

**RE: West End Trails Proposal**, Naturita and Nucla, CO Recreation Asset Review: Trail Opportunities

Dear Public Land Solutions,

San Miguel County welcomes the opportunity to comment on a proposal that is the culmination of years of local and regional cooperation. We recognize that this project was initiated by local residents who identified the resources and opportunity to bring sustainable economic benefits to the communities in the west end of Montrose and San Miguel Counties.

We understand that this project is in a pre-NEPA feedback phase and plan to participate in the subsequent BLM NEPA analysis. As a neighboring county with residents and businesses who have expressed interest in this proposal, we offer the following comments.

- We have heard and experienced the increased visitation to the Naturita, Nucla and Paradox areas this spring. We have heard from businesses and local residents that although they appreciate the visitors and the dollars they bring, the lack of public toilets (especially during the COVID-19 pandemic) is a growing area of concern. We suggest including public toilet facilities at the early stage of this proposal and that those facilities be as low maintenance and low cost as possible.
- The trail systems should consider big game habitat and mitigate or avoid impacts to wildlife resulting from trail use.
- Trails need to be constructed in an ecologically sustainable manner that utilizes proven best management practices.
- Trails should be aligned to protect sensitive plants and fragile soils, including biological soil crusts. With the increased visitation to the region and lack of awareness about the sensitive soils in the area, there is already significant natural resource damage occurring. Education and public outreach should be incorporated into the trail maps and messaging to reduce resource damage to these fragile ecosystems.

•P.O. BOX 1170 • Telluride, Colorado 81435 • (970) 728-3844 • [www.sanmiguelcountyco.gov](http://www.sanmiguelcountyco.gov)

- The proposal appears to contemplate parking and trailhead facilities on private property. The trail systems should be developed to be accessed by federal public land or require a permanent easement granted to the BLM for public access and trailhead development. Trails on public lands should not be allowed to become a private or commercial amenity.
- The Sawtooth Area abuts the Paradox Rock Art ACEC. Any trail system in this area should be configured to protect the important characteristics of the ACEC and its cultural resources.

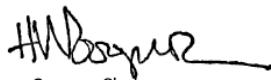
While the trail project is being scoped in four areas proximal to Nucla and Naturita in Montrose County, roads in adjacent San Miguel County could receive increased use and impacts, especially the roads in Dry Creek Basin area. Our Road and Bridge Superintendent flagged the following concerns to keep in mind during project development to minimize conflicts in adjacent San Miguel County.

- Many roads on the west end of San Miguel County do not receive consistent maintenance and have not been improved to a condition that can handle low profile vehicles. The County does not currently apply dust control but with increased travel it may become necessary to reduce air quality issues. This would be an unbudgeted expense for the County.
- Surface types on many roads are native and can quickly become impassable during inclement weather or during summer rainstorms. Visitors can become stranded and should be prepared to wait out conditions.
- Most roads do not receive winter maintenance. There are times during the early and late winter when the roads may appear passable but are not fit for vehicular traffic.
- Services are limited and response times for road repair can take longer than other parts of the County. This can have a negative impact on the response times of emergency personnel under certain circumstances.
- Road signs are limited and routes can become confusing at times. We ask that you work with counties to plan for the increased costs for road maintenance maps and signage.
- In San Miguel County, OHV's are only authorized on designated OHV routes. On all other County Roads, vehicles must be registered and recognized as "Street Legal" within the State of Colorado. Licensed vehicles in Utah or Arizona or any other state may not be recognized as "Street Legal" in Colorado. Adding, revising or changing any travel management plans on county roads will require Board of County Commissioner approval.

Finally, the communities of Nucla, Naturita and Paradox have a rich and highly valued history and culture. We want to see them thrive on their own terms and we support economic opportunities that they welcome and support. It is critical that the development of this recreational amenity continues to include broad representation of local stakeholders and is done in a way that benefits their communities as well as the users.

Thank you for your efforts to date.

Sincerely,



Hilary Cooper, Chair



Lance Wasinger, Vice Chair



Kris Holstrom, Commissioner

CC:

Town of Nucla - [nucla1@nntcwireless.com](mailto:nucla1@nntcwireless.com)

Colorado Parks and Wildlife – Evan Phillips [evan.phillips@state.co.us](mailto:evan.phillips@state.co.us)

West End Trails Alliance – [westend@copmoba.org](mailto:westend@copmoba.org)

Telluride Foundation – [info@telluridefoundation.org](mailto:info@telluridefoundation.org)

West End Economic Development Corporation – Deana Sheriff- [dsheriff@choosewestend.org](mailto:dsheriff@choosewestend.org)

Colorado Plateau Mountain Bike Trail Association – [trails@copmoba.org](mailto:trails@copmoba.org)

Bureau of Land Management – UFO – [tsukharnikova@blm.gov](mailto:tsukharnikova@blm.gov)

Montrose County – [jwaschbusch@montrosecounty.net](mailto:jwaschbusch@montrosecounty.net)

## **Comment Letter: Sheep Mountain Alliance; Lexi Tuddenham, Executive Director**



**Sheep  
Mountain  
Alliance**

**PO Box 389, Telluride, CO 81435 • 970-728-3729 • [www.sheepmountainalliance.org](http://www.sheepmountainalliance.org)**

To Whom It May Concern:

Thank you for the opportunity to comment on the trails proposal currently being developed by the West End Trails Alliance and Public Land Solutions in collaboration with many other community groups and individuals. Sheep Mountain Alliance took part in the open meetings held last fall in Nucla and truly appreciated being included in the open discussion process. We think it is critical to include stakeholders from the entire area who can help to inform the planning process with their and their members expertise, perspective, and knowledge.

First and foremost SMA wants to express its support for innovation of sustainable economic activities that will support communities not just in the West End, but throughout the entire region that we steward. We know that many communities are struggling right now in the midst of a global pandemic, an economic downturn, and at this time we think that it is more important than ever to evaluate the alternatives in front of us and make wise decisions that will allow for the continued protection of the landscapes, wildlife, watersheds and ecosystems that are more important than ever for our health and wellbeing. We believe that outdoor recreation and responsible recreation infrastructure are the future of the West End region.

We are concerned that many of the planned trails are in close proximity to wildlife habitat, such as critical deer and elk winter range, which intersect with the Naturita Flat Top planned trails area. As the planners heard at the meetings last fall, wildlife concerns are paramount to local community members, whether they be ranchers or farmers whose land might be adversely affected by displaced wildlife or hunters who rely on healthy elk and deer herds for recreation and subsistence. We appreciate that the new maps reflect some of these concerns, and that trail plans in the Nucla area have been discarded.

However, as comments from Backcountry Hunters and Anglers, as well as consultation with Colorado Parks and Wildlife suggest, several areas of potential wildlife conflict still exist. While we acknowledge that trail planners and users may enjoy systems of looped trails for the convenience and varying skill levels they provide, stacked loop trails are particularly problematic for fragmentation of wildlife habitat, especially when they create a barrier for animals trying to access critical resources like forage or water. We ask that you refer to Craig Grother's specific

comments for suggestions on how to mitigate wildlife impacts.

Many of the proposed trails either intersect with or are in close proximity to unmediated uranium mines and tailing piles, most notably in the Sawtooth planned area. A large amount of dispersed camping on these sites, and increased trail access seems likely to increase the traffic on these sites. How will public health and safety be protected in the instance of increased dispersed camping? And how will these sites in turn, which are often highly erodible, be protected from further degradation? Prior to building trails or at least concurrently, it is advisable to mount a comprehensive and well-planned effort to mitigate and remediate uranium mines and tailings, and decommission former mining roads that are not part of the motorized or non-motorized trails plan.

Enforcement of seasonal closures for wildlife or trail conditions is a difficult task and was a topic discussed during past public meetings. We have found that in other areas, while seasonal closures can be a useful way to limit impacts on wildlife during breeding seasons, or trail damage when trails are muddy, for example, they can be difficult to impossible to enforce. Collaboration with local BLM and CPW officials on an effective seasonal closure plan is necessary to ensure the health of wildlife habitats.

In addition to wildlife impacts, other biologic impacts to soils, plants, and water quality must be accounted for. The Sawtooth planned area is home to biological soil crust, and numerous thriving desert plants. Many historical mining roads cross this landscape and a thorough analysis of biological impacts must be taken if these roads are to see increased traffic, or new trails created.

While many of us enjoy the undeveloped nature of the BLM lands in the West End, increased recreation traffic brings a need for robust infrastructure. Trailheads with effective bathroom, trash, and parking facilities are vital to maintaining a separation of recreationists and the undeveloped BLM lands that will surround these trailheads.

A distinction must be made for the users for these proposed trails. Motorized and non-motorized users were welcomed in past public meetings, and it is important to distinguish the planned trails whether they be motorized, or primarily non-motorized trails. Regardless, the cumulative impact in the landscape must be assessed within the context of the many old roads that are currently formally or informally used for motorized travel and recreation.

Currently the southern edge of the proposed Sawtooth zone is along the Paradox Rock Art ACEC. If the Sawtooth trails passes close to this site it will inevitably increase traffic to these unique and vulnerable panels, some of which have already been defaced by uninformed

visitors. An effective plan through the BLM must be made to inform visitors of the important cultural resources present in the area.

Finally, provision of these proposed trail maps in GIS or .kmz format would allow stakeholders like us more opportunities to provide meaningful input and ensure that we are addressing any potential land use conflicts at the beginning of this process, rather than later, when it will be costly and difficult to correct errors.

We truly appreciate the opportunity to take part in this planning process and look forward to continuing conversations.

Sincerely,

Lexi Tuddenham  
Executive Director, Sheep Mountain Alliance

## Public Comments: West End Trails Online Public Comment Forum

**From:** DeeAnna Burbridge <[dburbridge@ymail.com](mailto:dburbridge@ymail.com)>

Message Body:

I would like a downloadable copy of the WestEndTrails Proposal. Thanks!

**From:** Mike Anderson <[miketelemark@hotmail.com](mailto:miketelemark@hotmail.com)>

Message Body:

I think the proposal is a fantastic idea. I appreciate the local input on wildlife corridors, private landholders and the chosen terrain for trail building which will provide high yield experiences that will add to word of mouth popularity and guarantee the success of the project. Thus will provide much needed revenue and visibility to the west end towns. My only suggestion is that some of the trail systems are designated motorized and others non motorized to limit user conflicts. Moto use is also well known to impact trail differently than mountain biking and hiking trails and will require different maintenance plans if they are to be enjoyed by all

Three user groups. Moab realized this around 2013 and the success of their non motorized trails have been a huge boon to their economy while at the same time reduced user conflicts on multi use trails. Great work everyone, and I would appreciate being included in any future correspondence or calls to action for trail work. Thanks again for the great work you are doing.

**From:** Zach Lentz <[zacharyclientz@gmail.com](mailto:zacharyclientz@gmail.com)>

Message Body:

I'm in full support of this project and know that it will contribute a lot to the local economy, as well as to the health and happiness of the community at large. Please let's make this happen! Thank you

**From:** Tom Murphy <[tmurphygunni@gmail.com](mailto:tmurphygunni@gmail.com)>

Message Body:

Appreciate it if ebikes are allowed.

**From:** Michael Doherty <[mpdoherty123@gmail.com](mailto:mpdoherty123@gmail.com)>

Message Body:

The need for well constructed Multi Use Trails is very relevant and timely. The user groups of Hiking, Mtn. Biking , Equestrian and Motorized OHV Users are excited to be able to use the resources available in these Public Lands.

**From:** Blake Johnson <[blake5565@gmail.com](mailto:blake5565@gmail.com)>

Message Body:

As a native Colorado resident I love this idea of expanding and adding more human powered trails. Mountain Bike destinations are becoming something of a desired attraction (see Bentonville, Arkansas). This eco friendly tourism is a terrific use of our resources and makes little impact on the environment. I would argue a positive impact on the environment as bikers are outdoors people and bring with them a respect of the land. There are too many ATVs running around unchecked on our public lands, especially in this area. It would be great to have this resource of the community

**From:** Tom Murphy <[tmurphygunni@gmail.com](mailto:tmurphygunni@gmail.com)>

Message Body:

Is the BLM helping to draft this plan. If so do they have a comment form on line? Thanks

**From:** Patrick Shehan <[patrickgshehan@gmail.com](mailto:patrickgshehan@gmail.com)>

Message Body:

Awesome to see this proposal! With Moab, Fruita and Junction usually pretty crowded it would be incredible to have new trail systems in the West End. With the rising popularity of mtn biking and climbing, I feel this would be a success in creating a sustainable West End economy. Given the terrain available, I could see the West End becoming a sought after mountain bike destination in as little as a decade. This article has some good points about Moab's development over the past three decades:

<https://www.hcn.org/articles/economy-moab-mayor-dave-sakrison-reflects-on-three-decades-of-transformation>

I'm confident the West End could mirror Moab's success to an extent!

"You could've shot a cannon off down Main Street and you wouldn't have hit too much," former mayor of Moab Dave Sakrison said about Moab in the mid 80s. Over more than three decades, Sakrison has both witnessed and actively contributed to making Moab the place it has become: a much visited, heavily Instagrammed destination whose popularity continues to grow with dizzying speed. When he first ran for city council, tourism — as a means to boost Moab's economy after the mining downturn.

**From:** David Barnett <[david.barnett@singletracktrails.com](mailto:david.barnett@singletracktrails.com)>

Message Body:

**From:** John B. Stewart <[jbsbldr@gmail.com](mailto:jbsbldr@gmail.com)>

Message Body:

This project will help maintain and build a strong sustainable economy for the town's of Naturita and Nucla. The impact of light recreation is minimal and can be maintained easily. I am strongly in favor of hiking and biking trails for the area. Thank you all for getting the project to this point. I look forward to building sustainable bike trails.

**From:** Kathy Noble <[knobleaia@yahoo.com](mailto:knobleaia@yahoo.com)>

Message Body:

The recent attempt by the Town of Naturita attorney to take away several citizens privacy and endanger their safety for a "river trail" has caused unnecessary hardship and a great amount of ill will. This is surely not the intent of the good people in the organizations involved. When walking on a "nature trail" why would one want to look into someone's backyard. There are other locations that would surely be more suitable.

**SAME AS ABOVE From:** Kathy Noble <[knobleaia@yahoo.com](mailto:knobleaia@yahoo.com)>

Message Body:

The recent attempt of the Town of Naturita attorney to take citizens privacy and endanger their safety for a "river trail" has caused hardship and a great amount of ill will; That is surely not the intent of the good people in the organizations involved. Why would one walking on a "nature trail" want to look into someone's backyard. There are other locations that would be much more suitable.

**From:** Chris Lehman <[cjlehman@gmail.com](mailto:cjlehman@gmail.com)>

Message Body:

As a Montrose County resident living near Buzzard Gulch, I can speak to the benefits of having well marked trails, clear access and user specific trails. The city of Montrose and Montrose County have benefited from the Buzzard Trail system and Sidewinder trail system, as many visitors come to the area to ride and hike. If these trail improvements were to come to fruition, my wife and I would visit often in the spring and fall seasons. We have made several trips to the RAT system and Thunder Mountain Trail system in the past year and would love to expand our adventures to other West End Trails. The described trail improvements would make along with camping options would make it an easier decision to head to Naturita and Nucla to mountain bike and hike.

I appreciate all of the work that has gone into this process to improve recreation opportunities in the area.

**From:** Rusty Scott <[rusty@timberlineacehardware.com](mailto:rusty@timberlineacehardware.com)>

Message Body:

As a homeowner in Nucla, I'm fully in support of all trail additions being proposed. I must say I'm very disappointed that all the area North of Nucla has been left out, because of wildlife concerns. I have lived and recreated in Western Colorado wildlands my entire life. There is no impact to wildlife. Unless they are being hunted, trapped or chased by dogs, the animals couldn't care less about people. This area is crisscrossed with roads from mining in the past. It only makes sense to utilize what is already there to enhance our outdoor activity options. We need the economic diversity. The West End is very remote, and we need multiple options if we want to draw visitors. Mt bikers in particular, will travel great distances for great trail/camping options.

**From:** Nancy Smith <[nancyva@sopris.net](mailto:nancyva@sopris.net)>

Message Body:

As an area resident, I would enjoy more designated trails. This proposal strikes me as well-thought-out, and could provide more opportunities without stepping on anyone's toes. The map kiosks would be wonderful. Also, in this new era of COVID-19, this area is seeing a huge increase in recreational use and dispersed camping. The lack of toilet facilities and trash management are big problems, so a little money invested in a few pit toilets and trash hauling (if feasible) would be money well spent.

**From:** Joanna Spindler <[joannahavana@gmail.com](mailto:joannahavana@gmail.com)>

Message Body:

Outdoor recreation of all kinds is the future of the West End! I look forward to the day when the economies of Nucla, Naturita and the greater Paradox area thrive on an influx of cyclists, climbers, hunters, boaters, and campers. A strong trail system will draw much-needed attention and appreciation to this wonderful area!

**From:** Mary Culver <[maggie50@gmail.com](mailto:maggie50@gmail.com)>

Message Body:

I support the proposal and commend West End Trails for their dedication to make lands accessible for hiking, biking and horse rides.

**From:** Thomas Mann <[tjmannfam@gmail.com](mailto:tjmannfam@gmail.com)>

Message Body:

Hello and thank you for this opportunity to comment on the west end trails plan. I live in Placerville co and have climbed, hiked, rafted, and enjoyed riding my motorcycle in the west end. I was pleasantly surprised to read that there was no intention to close any of the current motorized routes in the proposal. Admittedly there are many miles of old mining roads to explore in the proposal area but this is not really sought after terrain for most trail riding motorcyclists. Motorized trail riding is, like most outdoor activities, gaining popularity across the country and world. Just as the mountain bikers demand single track trails in beautiful areas we value the same experiences. There is also a rapidly growing popularity towards extremely technical trail riding for motorcyclists. These types of trails could be a huge draw to the area as there are just not that many extremely technical trails around. An example of one very popular technical trail would be "5 miles of hell" located in the San Rafael Swell area of Utah. Avid motorcyclist have been known to travel across the country to ride this 8 mile long trail and it gets more popular every year because of the increase in riders wanting that type of terrain. The planning area has huge potential for extreme trails that could also be sustainable. I fully support the addition of any motorized single track to the planning area and there are many local riders involved with the Public Access Preservation Association (PAPA) who are willing to help route, build and maintain any new motorized single track trails in the west end. ATV and SxS vehicles have also become very popular over the last decade. I think it would be wise to try and mitigate accidents by creating more single track trail miles for motorcycles. Finally, there is plenty of room for all of us to recreate the way we please in the west end and I would be thrilled to see different users tolerate each other a bit better than I've seen lately.

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**From:** Chuck Barrett <[Tmproper1956@aol.com](mailto:Tmproper1956@aol.com)>

Message Body:

After reading over the proposal I am pleased with the outcome. I think the two best locations have been chosen to study . While at the meeting on Sept 11 . I was concerned about the seasonal wildlife closure . One thing this area has over other trails in Colorado is a weather advantage. It would be a shame to close the trails when they have the ability to be used when others are snowed in .  
Wildlife do get accustomed to cyclists over time. I often ride on trails that whitetail deer are grazing and bedded down only yards from the trails with no concern as long as you maintain pace .

Overall I think this is a great opportunity to bring back the economy to this area and increase property values .

Thanks for all your hard work

**From:** Chris Muhr <[chris@allmetalswelding.com](mailto:chris@allmetalswelding.com)>

Message Body:

Thank you for sending the West End Trails Proposal. I'd like to in turn send you my adventure tourism concept called the Western Colorado Adventure Trail. For the past four years I've worked with and continue to work with various professors and student groups at Colorado Mesa University to develop a passport driven marketing system targeting mountain bikers, adventure motorcyclists, road bicyclists, and overland expeditionists, to entice them to visit several of our struggling communities on the western slope like ;Nucla/Naturita and Paonia/Delta along with about 20 other on the western slope.

Using the world class reputations of Fruita, Crested Butte and Durango, I propose using a passport system to compel adventure tourists to not only visit the hot spots, but to explore some of our more beautiful and unknown areas as well. It's the exposure of these well educated, high household income, entrepreneurial group which will not only drive tourism dollars to Nucla and Naturita, but also relocation of these younger, well educated people to these and other small communities that so desperately need economic diversity to survive. It's worked in Fruita, Crested Butte and is

currently working in Ridgway with the new Ridgway Area Trails (RAT Trails) and it can work in our communities that are losing their coal mining industries.

I have marketing strategies, demographic studies and phone application demonstrations already completed and ready to go thanks to the incredible support of CMU.

Please let me send you the power point presentation, or better yet, let me sit face to face.....or mask to mask with you and explain how I believe the West CAT Trail will make our area of western Colorado the 800 lb gorilla of adventure tourism.

Thanks so much for your time!!

Chris Muhr

Vice President, Colorado Mountain Bike Trail Association

**From: PJ Royer <[pj81423@yahoo.com](mailto:pj81423@yahoo.com)>**

Message Body:

Yes! We love trails!

**From: Elizabeth Stuffings <[estuffings@gmail.com](mailto:estuffings@gmail.com)>**

Message Body:

Both of the proposed trail systems rely to some degree on a partnership with Camp V. I think it would be good to better clarify this potential partnership in the proposal, especially since the camp is not yet established. It would be good for the reader and BLM to better understand what Camp V is, how they will be involved, and what sort of formal partnerships/contracts will need to be in place to utilize their property for parking, trail access, etc.

On page 12, it is mentioned that in theory the need for parking for the Flat Tops area will be small since people will be riding from their homes or accommodations. This doesn't take into account regional riders coming from Norwood, Telluride, Ridgway, etc. that will likely be on a day trip and require TH parking. The need could be larger than anticipated in the proposal.

The Sawtooth overview states that in-situ disturbances will be utilized for some portion of a trail system. At the January WETA meeting, USFS Trails Manager John Hidy stated that utilizing double track to create single track has problems and doesn't always work well from a building standpoint. Drainage was one specific issue that was brought up. At the same meeting, it was discussed that, in order to draw mountain bikers to the area, the focus needs to be on developing high quality single track. If economic development is key to the plan, two track and/or creating single track from an existing two track, won't entice large numbers of riders to the area—especially when there are relatively close single track options for riders to access (Moab, Grand Junction, Ridgway, Cortez, Dolores). While some will be interested in checking out typical West End adventure riding on old two track, to bring in the number of riders to effect economic change in the West End, I believe the plan shouldn't rely on decommissioning old roads and turning them into single track options.

Based on the concept trail maps, is it possible to determine how many miles of trail at the Flat Tops area would likely be subject to seasonal closures? A big draw to recreating in the West End is its great late winter and spring hiking and biking conditions. Pushing for building trails on tracts of land that will be closed during these times may not be the best use of the area's resources, especially if economic development is a key desired outcome.

It would be nice to have a more in-depth overview of the comments/discussions from the two public meetings and additional meetings that were had with specific interest groups and organizations—perhaps this can be compiled into an additional appendix. The current discussion in the proposal seems a little opaque and, when presented to the BLM, may not leave the reader feeling like all community and interest group comments have been addressed. It seems like the BLM wants to receive a proposal that has been thoroughly vetted by stakeholders to avoid any

obstacles when it comes to the implementation phase of the project. A more thorough review of the initial meetings and follow-up discussions would help achieve that.

**From:** Natalie Binder <[natalie@campv.com](mailto:natalie@campv.com)>

Message Body:

We are in complete support of the West Ends Trails Proposal and appreciate all the hard work that has gone into planning. CampV is in complete support of being a partner and will provide much needed camping and cabin rentals for outdoor recreation users. We feel the success of the project is an important cornerstone to our success and the ability to bring repeat recreation users to the West End Area. As our world changes, outdoor trails will become more important than ever and aid in much needed economic stability.

Thank you,  
Natalie Binder  
CampV

**From:** Kendal Smith <[kendaloak@gmail.com](mailto:kendaloak@gmail.com)>

Message Body:

I am in support of the building of additional trail systems near Naturita and Nucla so long as care is taken to build them right. The impact of the riders will be less if the trails are well done because riders tend to stay on trail if they are clear and designed in a way that they can keep moving. Also, I would want trailhead information about the uniqueness of Desert ecosystems to educate people on environment they are about to ride through and why it is important to respect it.

In the past, recreation was just a small piece of a community but now can be what the area is known for and bring in a significant amount of people if it gets "on the map" so to speak. Fruta is a great example of this and fully has embraced the biking scene.

**From:** James Fitzmorris <[jpfitzmorris@gmail.com](mailto:jpfitzmorris@gmail.com)>

Message Body:

The development of recreation in the west end is really the only economic hope that I can think of. At any rate the support of the county is needed, and the trails proposal is an excellent direction. Also Montrose county really needs to step up and do their part in controlling weeds ( and I do not mean marijuana ) in the west end.

**From:** Mike Skoko <[skoko306@gmail.com](mailto:skoko306@gmail.com)>

Message Body:

I think this is a fantastic proposal full of wonderful ideas. I feel that the West End is in the perfect position to capitalize on the unique environment (solitude, rugged yet accessible terrain and river access) to make it a recreation hotspot. I feel that working closely with the agencies to develop a solid plan and gain environmental clearances in a quick and responsible manner will allow the community to take advantage of both economic development and trail development grants. This type of development is both environmentally responsible and sustainable.

I feel that the WETA group's plan to first sign the existing "roads" is a great first step. To truly create an environment that people will travel to and spend money locally, there does need to be purpose built trails with a variety of terrain and difficulty that folks have been accustomed to. When it does come to trail layout/planning and construction, this should not be skimped on. Not getting appropriate trail crew can make or break an area, and this place is way too special for bad layout/construction.

Congratulations and I hope to ride, hike and camp by the river in the wilds of the West End while spending money in Naturita and Nucla.

**From: Interested Local Hiker <[prust01@msn.com](mailto:prust01@msn.com)>**

Message Body:

Small item - typographical error - "it's" is a contraction for "it is". Correct word for the cases within this proposal are "its", signifying ownership.

Can't figure out the six towns mentioned. I come up with Naturita, Nucla, Norwood, Bedrock, Paradox. What is the sixth town? Is it Basin? You may want to mention them to clarify.

Comparison to Fruita makes me chuckle. Fruita is a bedroom community for Grand Junction and most people who live in Fruita work in Grand Junction. Not personally aware of a single economic driver they used to have although my knowledge of their history is limited. They do indeed have a flourishing biking industry with many trail opportunities but they also are right off a major interstate, easy to get to, and close to Colorado National Monument, which also brings tourists. Getting the word out to those who frequent Fruita or Grand Junction trails will be beneficial to your plan.

I do wish you the best of luck in obtaining grants and improving trails and recreational assets for this area. Trailhead markings and parking areas do a lot to encourage public use.

Thanks for the opportunity to review this!

**From: jamie finney <[jafi0938@colorado.edu](mailto:jafi0938@colorado.edu)>**

Message Body:

Love this. Thanks for your hard work.

directional and mtn bike specific portions of trails will optimize traffic on the trails and better management of the hiker/horseback/mtn biker interfaces.

**From: Deana Sheriff <[dsheriff@choosewestend.org](mailto:dsheriff@choosewestend.org)>**

Message Body:

The proposal is well done. I would suggest a larger map at the beginning of the document to help orient the reader to the scale of the area, and help identify locations called out within the verbiage (i.e., Saucer Basin, Rimrocker Trail, etc.).

Good luck with the proposal! We're behind you all the way!

**From: Tony Adkins <[arapgllc@nntcwireless.com](mailto:arapgllc@nntcwireless.com)>**

Message Body:

I support the responsible development of trails for mountain biking and hiking in the Naturita South as a whole and in the Sawtooth area with one exception. The exception is the area between where the natural gas pipeline cuts North-South through the Sawtooths and roughly where the downdip projection of the Bitter Creek loop on EE22 meets Hwy 141.

This area is lightly marked by the intensive historic uranium exploration that is common NW of the Bitter Creek downdip projection. Which means it is relatively undisturbed. Because of the extensive Burro Canyon Formation caprock, deep, dark canyons are present that host aspens, Ponderosa pine, oakbrush and other vegetation indicative of higher elevations. Cliff and caves are also present. WETA has one hiking trail in this area, which I think is sufficient. Cross-country travel is also OK. Perhaps one mountain biking trail would be OK to show the nature of the caprock/canyons/cliffs to recreationalists, but I do not believe the area is suitable for high-intensity trail development such as a stacked loop system for bikes or other types of closely spaced trails.

**From:** Michelle Zunich <[shredbetty72@gmail.com](mailto:shredbetty72@gmail.com)>

Message Body:

I have rode these trails most of my life and I love them. I believe they are very important to bring in tourist travel to boost the economy in our beautiful area. Thank you to all the people that have worked so hard to keep these trails going.

**From:** Roy Karo <[lionhunter\\_syrup@yahoo.com](mailto:lionhunter_syrup@yahoo.com)>

Message Body:

This looks overwhelming. The Proposed trails look like spaghetti on the map. In my experience with trails around the Nucla area and particularly the National Monument and Grand Junction area, the best and most popular trails are ones with a destination. Aimlessly wandering around in loops and gnat infested trees is not fun--its boring and pointless. I understand the point of establishing a system of trails and exciting stuff but just hiking is not a very good attraction. Search each area for unique features and make a trail to those. Make one master loop with several side ventures. Bathroom facilities are a must! Too many trails and trailheads are littered with human waste.

Take a look at the North Fork of the Tabaguache, Indian Trail. It has amazing potential (6 waterfalls! a natural bridge! wildlife and it already is approved). Also, there are a few Anasazi ruins in and around the Nucla/Naturita area that would make an interesting reason to visit the area. Outlaw Mesa has some cool ghost towns and mining relics, too.

Restrooms and water! 60% of your visitors do not ride bikes; can't walk more than 2 miles and need to pee about every 30 minutes. Also, look at the RIMS app from Rocky Mountain Club for a monitoring and public involvement tool. I think this app has good potential for assessing problems and recording them. Check it out, you'll see what I mean. Just having a monitoring plan in place before you begin makes a lot of sense. I have a lot of interest and expertise to share, please let me help. Thanks, Roy Karo

**From:** david holbrooke <[dholbrooke@mac.com](mailto:dholbrooke@mac.com)>

Message Body:

Hi All -First of all, thanks for doing this important work on West End Trails. My family and I have been spending a LOT of time down there this spring and are working to buy some property in Naturita that abuts some of the land that you are looking at for trails. We are avid hikers, climbers and mountain bike riders so hope that this can all be developed. We very much believe in the Fruita model that you all mention in this proposal and think that this area could offer so much to folks who enjoy the outdoors. We even call it a mini-Moab given the landscape around there. What we hope is that there are dedicated trails to non-motorized use. Personally, I am fine with E-Bikes and would hope that there are lots of options for everyone but that those of us who are using non-emitting modes of transportation don't have to choke on other's exhaust. As happened in Fruita, if the trails emerge in a big way, there will be other enormous economic opportunities for the region. For instance, in Naturita, the diner Blondies is for sale and we hope that some outdoor oriented folks buy it and make that a cool spot for people just like the now-iconic Hot Tomato Pizzeria thrives in Fruita. Also, of course, a bike shop needs to open there as well which will become its own draw. We look forward to seeing what happens there and are looking forward to helping if we can. Thanks again and good luck with it all.

David

**From:** Rob Gowler <[robgowler@gmail.com](mailto:robgowler@gmail.com)>

Message Body:

I have recently spent about 6 weeks riding my mountain biking, exploring, camping, climbing, SUP'ing and generally just enjoying what the West End has to offer. As a mountain guide for over 25 years I am able to read maps and navigate comfortably, I am a very responsible camper as well...I don't mind driving between riding locations, and I also don't mind riding 50+ miles to avoid a car shuttle! But I am not the normal visitor to the area I don't think! In my time in the area I have seen lots of trailer campers, Vans etc with bikes in tow...many of which have kids bikes on the racks. I live between Moab and Ridgway and obviously spend a lot of time riding in those areas as well as travel all over the Western states riding, climbing and trail running. As noted in the West End Trails Proposal, people definitely want to be able to camp in an area that has easy access to trails.

Stacked loops are the most popular types of trail networks these days. 18 Road is a great example. 18 road doesn't have a massive amount of trails there, although it's fairly substantial, but what it does offer is dispersed camping as well as paid camping RIGHT NEXT TO the trails. The kids can go out and do a lap while the parents have a beer in the evening, or one parent can stay in camp and watch a toddler while the other rides. In Fruita, the Loma exit riding is quite substantial! People show up there for the day, ride, go to the Hot Tomato Pizza place, hit the Liquor store, get gas and firewood and return to 18 Road to camp...

The other type of trail that attracts a huge user group is predominantly down hill shuttle rides. The area already has a bit of this with sections of the Paradox trail...But areas like Palisade Colorado are spending a ton of time, money and resources building big downhill trails...

Right now, what the West End has to offer mountain bikers: a limited amount of single track and a lot of two track. While the two track often rides like single track, mountain bikers are a picky group and what they really want is purpose built single track!

Obviously the WE badly NEEDS signage in the NEAR future for existing routes, both for motorized and non motorized travelers. And, until a solution for camping is available, there needs to be education on camping etiquette and LNT (Leave No Trace). But this should be a priority to come up with a plan...

Organized Camping is just as crucial to having a concentration of trails in my opinion to attract visitors. If there is not a concentration of trails in Nucla, for example, visitors may not visit the town. Fruita spent all of their time and resources developing 2-3 distinct riding areas! 18 road, Loma and Rabbit valley.

Fruita is right on the I-70 Corridor, Moab is next to two major National Parks...The West End will probably never have the amount of visitors that Moab and Fruita have, but that will be the allure to spending time recreating in the West End...With a well thought out concentration of trails in and around towns, visitors will come!!

Rob Gowler

**From:** Jeffrey Hooks <[smh6123@centurylink.net](mailto:smh6123@centurylink.net)>

Message Body:

I'm more concerned about the availability of electricity because of all the power generating stations being retired and no resources to replace them then creating recreational opportunities that will just put additional strain on existing utilities and communities.

**From:** Jennifer Heidergott <[pintcal24@hotmail.com](mailto:pintcal24@hotmail.com)>

Message Body:

This is a great opportunity for the community. I hope/prey they know what could happen. I am a rock climbing recreator and have a hard time choosing to climb in Moab or Telluride because both locations are too touristy. It sucks to feel like your town has lost it's soul to tourism.

I like that this proposal is mostly focused on bike trails. Adding and making, jeep and utv trails, more attractive to the ohv community would really displace wildlife in winter, a vulnerable time for most species.

Last thing and it's too late, but this document mentions Paradox Trail under the motorized and ohv section. If you are referring to the Paradox Trail that starts off of 25 Mesa (Delta-Nucla) Road it is designated non-motorized.

Thanks

Jenn

**From:** Ken Lukaszewski <[kenlukaszewski@gmail.com](mailto:kenlukaszewski@gmail.com)>

Message Body:

The Flat Tops look wonderful especially for beginners as was mentioned.

Parking was mentioned at trail heads: Please consider folks driving in from communities around Naturita such as Norwood, Telluride, Montrose, Ridgway and Ouray. Maybe have a plan ready to expand visitor parking if needed years from now when the area succeeds in its development and notoriety.

I am especially glad to hear there will be more signage. This is very important for unfamiliar visitors and beginners. I like loop trails more than out and back. Maybe there are ways to run shorter loops within the larger loops for hikers that may include small children or beginner bikers.

Any insteps toward developing trails in Norwood area would be great.

**From:** Karen Murphy <[bratkaren@yahoo.com](mailto:bratkaren@yahoo.com)>

Message Body:

I support West End trails.

**From:** Phillip Robins <[highcountrybicycles@gmail.com](mailto:highcountrybicycles@gmail.com)>

Message Body:

Due to the poor appeal and lack of amenities in west end communities, trails need to out-do some of the best trails moab, fruita and grand junction have to offer. Simply cutting single track will be a complete waste of time and resources except to provide back yard access to the few riders that already exist in the area. To create something that benefits the entire community in way of increased visitation, intense trail planning needs to exist with input from top trail and park builders in the county. The money will be well spent, as the simple marketing of who and how the trail was built will entice visitation of the talented and passionate mountain bike communities of the western slope and utah, extending to the front range. Sleepy single track will have a reverse effect on visitation as riders will report back to their home communities how the trip to our west end wasn't worth it. Simple, family friendly trails already exist in this area so these trails need to be made special. We should consider building north shore features, made from metal and wood, to create an area trail flavor. These stunts will work well with the mining and industrial heritage of the region. There is also an opportunity to use features to span low areas and washes, providing a trail that circumvents wet spots, preventing erosion and making trail usage viable in seasons with snow and heavy precipitation.

**From:** Anthony Cooper <[pipedoctor@hotmail.com](mailto:pipedoctor@hotmail.com)>

Message Body:

The trails need to be open to off-road motorcycle use as well as hikers horses and mountain bikers.

**From:** Rob Story <[robstory@aol.com](mailto:robstory@aol.com)>

Message Body:

This is a fantastic proposal! Please make it happen.

**From:** Shawn Gregory <[shawn@icnolimits.com](mailto:shawn@icnolimits.com)>

Message Body:

Hello, Please accept my comments regarding the West End Trails Proposal.

It has been proven that an extensive mountain bike trail system provides a huge economic boost to communities by bringing in outside revenue. Having a great trail system also improves the health of the community by getting residents outside and active.

Where Naturita/Nucla can clearly benefit is providing trail recreation in the early spring when surrounding areas are snowed in. It is also important to have enough trail options to give a user different trail route choices over multiple days to ensure they stick around and spend money in the town.

The seasonal closure proposed is excessive and squarely blocks access to a majority of the proposed trails during the primary use season. I assume CPW and opposition groups have submitted various graphs and studies in an effort to justify seasonal closures blaming trail users for wildlife issues. It's important to remember that CPW is also interested in generating revenue through the sale of hunting licenses so some of that same wildlife can be pursued and mortally wounded later in the year. I'm also disappointed that so much public land is available in that area yet such a small portion is considered acceptable for trail systems.

If CPW is holding grant money hostage to get seasonal closures please consider alternative sources for trail construction funding to ensure a successful trail system is developed that has all the elements to benefit the surrounding communities and trail users.

Thank you for your time and effort.

**From:** Adam mosier <[oodie8@hotmail.com](mailto:oodie8@hotmail.com)>

Message Body:

Please consider the following:

- long term infrastructure plans. Ie; camping, parking, toilets, map signage, recycling, etc.
- for bikers: utilize areas for trails that are less likely to be shut down during portions of the year, due to animal habit or other user conflicts.
- long term goals of connecting trials to other communities (i.e.; Moab, dove creek, grand junction, telluride, etc.)
- encouraging user participation in design, construction, and maintenance of trails.
- for bikers: trails that are either flowy and fast or are technical and slower. When trails are inconsistent, it makes for a less enjoyable experience.

Thank you.

**From:** Pepper Raper <[cpepperr@gmail.com](mailto:cpepperr@gmail.com)>

Message Body:

I want to express my support for bolstering the trail systems in the West End. The West End has so much natural beauty it is a prime destination for outdoor activities. I especially want to encourage the creation of OHV and Motorized trails. A well marked system with designations of beginner, intermediate, advanced would be incredible!

**From:** Kent Ford <[wkentford@gmail.com](mailto:wkentford@gmail.com)>

Message Body:

Please don't overlook paddle trails! The San Miguel to the Dolores COULD be a trail all the way down to the Colorado River Confluence. However, this section: San Miguel - Green Truss Bridge to Naturita of 6 Miles is unrunnable except for serious adventurers at low flows, due to man made fences and diversions. This is a huge shame, as it interrupts the possibility of a 147 mile float from Placerville into the Colorado River and on into Moab, UT. It is scenic, starting to take on some Dolores feel, and certainly not crowded. However, there are two low-head dams, and many fences that cross the river posing serious threats to paddlers. We need to be working towards rehabilitating the TWO very dangerous low head dams to improve fish passage and navigability for boats. Currently they are unmarked and surprisingly tough to see. The fences are bad too. As you approach Naturita, don;t relax, as the ugliest fences (wooden pallets on heavy cable) are on blind corners. Please include this paddle trail in your work, and let me know if you have questions! Thanks for your project.

**From:** Lloyd Liebetrau <[Lloyd.Liebetrau@totalspeed.com](mailto:Lloyd.Liebetrau@totalspeed.com)>

Message Body:

I support the expansion of trail use in the area. It has many economic values. What the OHV community doesn't want to see happen is existing motorized trails and roads get converted to non motorized use. This area is an important destination for motorized as it is part of the Rim Rock trail and if done right could be a destination by adding and identifying more OHV trails in the area.

**From:** Mason Osgood <[vista@sheepmountainalliance.org](mailto:vista@sheepmountainalliance.org)>

Message Body:

To Whom It May Concern:

Thank you for the opportunity to comment on the trails proposal currently being developed by the West End Trails Alliance and Public Land Solutions in collaboration with many other community groups and individuals. Sheep Mountain Alliance took part in the open meetings held last fall in Nucla and truly appreciated being included in the open discussion process. We think it is critical to include stakeholders from the entire area who can help to inform the planning process with their and their members expertise, perspective, and knowledge.

First and foremost SMA wants to express its support for innovation of sustainable economic activities that will support communities not just in the West End, but throughout the entire region that we steward. We know that many communities are struggling right now in the midst of a global pandemic, an economic downturn, and at this time we think that it is more important than ever to evaluate the alternatives in front of us and make wise decisions that will allow for the continued protection of the landscapes, wildlife, watersheds and ecosystems that are more important than ever for our health and wellbeing. We believe that outdoor recreation and responsible recreation infrastructure are the future of the West End region.

We are concerned that many of the planned trails are in close proximity to wildlife habitat, such as critical deer and elk winter range, which intersect with the Naturita Flat Top planned trails area. As the planners heard at the meetings

last fall, wildlife concerns are paramount to local community members, whether they be ranchers or farmers whose land might be adversely affected by displaced wildlife or hunters who rely on healthy elk and deer herds for recreation and subsistence. We appreciate that the new maps reflect some of these concerns, and that trail plans in the Nucla area have been discarded.

However, as comments from Backcountry Hunters and Anglers, as well as consultation with Colorado Parks and Wildlife suggest, several areas of potential wildlife conflict still exist. While we acknowledge that trail planners and users may enjoy systems of looped trails for the convenience and varying skill levels they provide, stacked loop trails are particularly problematic for fragmentation of wildlife habitat, especially when they create a barrier for animals trying to access critical resources like forage or water. We ask that you refer to Craig Grother's specific comments for suggestions on how to mitigate wildlife impacts.

Many of the proposed trails either intersect with or are in close proximity to unmediated uranium mines and tailing piles, most notably in the Sawtooth planned area. A large amount of dispersed camping on these sites, and increased trail access seems likely to increase the traffic on these sites. How will public health and safety be protected in the instance of increased dispersed camping? And how will these sites in turn, which are often highly erodible, be protected from further degradation? Prior to building trails or at least concurrently, it is advisable to mount a comprehensive and well-planned effort to mitigate and remediate uranium mines and tailings, and decommission former mining roads that are not part of the motorized or non-motorized trails plan.

Enforcement of seasonal closures for wildlife or trail conditions is a difficult task and was a topic discussed during past public meetings. We have found that in other areas, while seasonal closures can be a useful way to limit impacts on wildlife during breeding seasons, or trail damage when trails are muddy, for example, they can be difficult to impossible to enforce. Collaboration with local BLM and CPW officials on an effective seasonal closure plan is necessary to ensure the health of wildlife habitats.

In addition to wildlife impacts, other biologic impacts to soils, plants, and water quality must be accounted for. The Sawtooth planned area is home to biological soil crust, and numerous thriving desert plants. Many historical mining roads cross this landscape and a thorough analysis of biological impacts must be taken if these roads are to see increased traffic, or new trails created.

While many of us enjoy the undeveloped nature of the BLM lands in the West End, increased recreation traffic brings a need for robust infrastructure. Trailheads with effective bathroom, trash, and parking facilities are vital to maintaining a separation of recreationists and the undeveloped BLM lands that will surround these trailheads.

A distinction must be made for the users for these proposed trails. Motorized and non-motorized users were welcomed in past public meetings, and it is important to distinguish the planned trails whether they be motorized, or primarily non-motorized trails. Regardless, the cumulative impact in the landscape must be assessed within the context of the many old roads that are currently formally or informally used for motorized travel and recreation.

Currently the southern edge of the proposed Sawtooth zone is along the Paradox Rock Art ACEC. If the Sawtooth trails passes close to this site it will inevitably increase traffic to these unique and vulnerable panels, some of which have already been defaced by uninformed visitors. An effective plan through the BLM must be made to inform visitors of the important cultural resources present in the area.

Finally, provision of these proposed trail maps in GIS or .kmz format would allow stakeholders like us more opportunities to provide meaningful input and ensure that we are addressing any potential land use conflicts at the beginning of this process, rather than later, when it will be costly and difficult to correct errors.

We truly appreciate the opportunity to take part in this planning process and look forward to continuing conversations.

Sincerely,

Lexi Tuddenham  
Executive Director, Sheep Mountain Alliance

**From: San Miguel County Board of County Commissioners <[bocc@sanmiguelcountyco.gov](mailto:bocc@sanmiguelcountyco.gov)>**

Message Body:

•P.O. BOX 1170 • Telluride, Colorado 81435 • (970) 728-3844 • [www.sanmiguelcountyco.gov](http://www.sanmiguelcountyco.gov)  
BOARD OF COMMISSIONERS  
HILARY COOPER KRIS HOLSTROM LANCE WARING  
May 29, 2020  
Public Land Solutions  
Submitted via internet comment form: <https://publiclandsolutions.org/westend/>  
RE: West End Trails Proposal, Naturita and Nucla, CO Recreation Asset Review: Trail Opportunities  
Dear Public Land Solutions,  
San Miguel County welcomes the opportunity to comment on a proposal that is the culmination of years of local and regional cooperation. We recognize that this project was initiated by local residents who identified the resources and opportunity to bring sustainable economic benefits to the communities in the west end of Montrose and San Miguel Counties.  
We understand that this project is in a pre-NEPA feedback phase and plan to participate in the subsequent BLM NEPA analysis. As a neighboring county with residents and businesses who have expressed interest in this proposal, we offer the following comments.

- We have heard and experienced the increased visitation to the Naturita, Nucla and Paradox areas this spring. We have heard from businesses and local residents that although they appreciate the visitors and the dollars they bring, the lack of public toilets (especially during the COVID-19 pandemic) is a growing area of concern. We suggest including public toilet facilities at the early stage of this proposal and that those facilities be as low maintenance and low cost as possible.
- The trail systems should consider big game habitat and mitigate or avoid impacts to wildlife resulting from trail use.
- Trails need to be constructed in an ecologically sustainable manner that utilizes proven best management practices.
- Trails should be aligned to protect sensitive plants and fragile soils, including biological soil crusts. With the increased visitation to the region and lack of awareness about the sensitive soils in the area, there is already significant natural resource damage occurring. Education and public outreach should be incorporated into the trail maps and messaging to reduce resource damage to these fragile ecosystems.

San Miguel County, Colorado

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- The proposal appears to contemplate parking and trailhead facilities on private property. The trail systems should be developed to be accessed by federal public land or require a permanent easement granted to the BLM for public access and trailhead development. Trails on public lands should not be allowed to become a private or commercial amenity.
- The Sawtooth Area abuts the Paradox Rock Art ACEC. Any trail system in this area should be configured to protect the important characteristics of the ACEC and its cultural resources.

While the trail project is being scoped in four areas proximal to Nucla and Naturita in Montrose County, roads in adjacent San Miguel County could receive increased use and impacts, especially the roads in Dry Creek Basin area. Our Road and Bridge Superintendent flagged the following concerns to keep in mind during project development to minimize conflicts in adjacent San Miguel County.

- Many roads on the west end of San Miguel County do not receive consistent maintenance and have not been improved to a condition that can handle low profile vehicles. The County does not currently apply dust control but with

increased travel it may become necessary to reduce air quality issues. This would be an unbudgeted expense for the County.

- Surface types on many roads are native and can quickly become impassable during inclement weather or during summer rainstorms. Visitors can become stranded and should be prepared to wait out conditions.
- Most roads do not receive winter maintenance. There are times during the early and late winter when the roads may appear passable but are not fit for vehicular traffic.
- Services are limited and response times for road repair can take longer than other parts of the County. This can have a negative impact on the response times of emergency personnel under certain circumstances.
- Road signs are limited and routes can become confusing at times. We ask that you work with counties to plan for the increased costs for road maintenance maps and signage.
- In San Miguel County, OHV's are only authorized on designated OHV routes. On all other County Roads, vehicles must be registered and recognized as "Street Legal" within the State of Colorado. Licensed vehicles in Utah or Arizona or any other state may not be recognized as "Street Legal" in Colorado. Adding, revising or changing any travel management plans on county roads will require Board of County Commissioner approval.

Finally, the communities of Nucla, Naturita and Paradox have a rich and highly valued history and culture. We want to see them thrive on their own terms and we support economic opportunities that they welcome and support. It is critical that the development of this recreational amenity continues to include broad representation of local stakeholders and is done in a way that benefits their communities as well as the users.

San Miguel County, Colorado

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Thank you for your efforts to date.

Sincerely,

Hilary Cooper, Chair; Lance Waring, Vice Chair; Kris Holstrom, Commissioner

CC:

Town of Nucla - [nucla1@nntcwireless.com](mailto:nucla1@nntcwireless.com)

Colorado Parks and Wildlife – Evan Phillips [evan.phillips@state.co.us](mailto:evan.phillips@state.co.us) West End Trails Alliance –

[westend@copmoba.org](mailto:westend@copmoba.org) Telluride Foundation – [info@telluridefoundation.org](mailto:info@telluridefoundation.org) West End Economic Development

Corporation – Deana Sheriff- [dsheriff@choosewestend.org](mailto:dsheriff@choosewestend.org) Colorado Plateau Mountain Bike Trail Association – [trails@copmoba.org](mailto:trails@copmoba.org)

Bureau of Land Management – UFO – [tsukharnikova@blm.gov](mailto:tsukharnikova@blm.gov)

Montrose County – [jwaschbusch@montrosecounty.net](mailto:jwaschbusch@montrosecounty.net)

**From: Cookie Loczy <[cookiel13@peoplepc.com](mailto:cookiel13@peoplepc.com)>**

Message Body:

Please take signage seriously. Your trail sign at Slaughter House has North facing South. Not sure if that is why we had a lost hiker, but it needs to be corrected.. The podium needs to rotate 180°. I have also been told that the current ATV trails are incorrectly marked.

**From: Tom Loczy <[gunnert@peoplepc.com](mailto:gunnert@peoplepc.com)>**

Message Body:

I'm against the plans the trails alliance has proposed. It been a long established effort of this group to promote single track trails on existing two track trails then closing the long established two Track for themselves. Thus eliminating motorized vehicles from the long established roads. It's a ongoing tactic they've used all over the area.

If people want to ride there bikes I have no problems with that on the existing roads.

I'm sure everyone that is in favor of these trails are saying we will share the trails but I've seen the effects to many times to trust them..

There are plenty of roads on Long Park created by the old miners that can be enjoyed by everyone not just a certain group.

**From:** Craig Grother <[craiggrother@yahoo.com](mailto:craiggrother@yahoo.com)>

Message Body:

West End Trails Proposal

Posted May 6, 2020

BHA comments May 30, 2020

Thank you once again for the opportunity to comment on the most recent West End Trails Proposal. We appreciate being included in previous public meetings and for your consideration of our comments in combination with the local CPW District Wildlife Manager on this plan for trail development on our public lands in the West End of Montrose County.

We are especially pleased to see that all plans for trail development on big game winter range in the Nucla East and Nucla North areas were completely dropped from the plan to sustain the past efforts of CPW and local landowners to resolve conflicts with local agricultural producers. We also appreciate you dropping previous proposals to build trails in Saucer Basin, Hieroglyphic Canyon, and limiting trail development to one connector trail between the proposed Camp V trail head and the South Sawtooth trail head. This modification will help prevent the further fragmentation of the few remaining areas that are relatively intact wildlife habitat.

We now offer the following comments and suggestions on this recent version of the proposal.

#### Naturita/Nucla Recreation Review: Current Outdoor Recreation Assets

It is unclear what the extent of the study area is for this section of the document. There are references to Montrose County, San Miguel County, and the upper section of the Dolores River near Dove Creek. The public lands and waters surrounding the towns of Naturita and Nucla provide numerous outdoor recreation assets, but those assets should not be overly exaggerated.

#### Hunting

Naturita and Nucla are situated most closely to GMU 61 and GMU 70. All of the proposed trails are located within GMU 70. Big game hunting in GMU 61 is managed by CPW as a quality hunting unit, and all elk and deer hunting is limited. Hunting elk in this unit is a premier experience that requires up to 19 preference points for a Colorado resident, and as many as 25 points for a non-resident hunter to draw a tag. Deer hunting also requires up to 6 preference points for a resident and 10 points for a non-resident. Most hunters who draw one of these coveted elk tags, especially non-residents, will book their hunts with local outfitters.

GMU 70 is a very popular hunting unit as well, and hunters from all over the Nation come to hunt the public lands in the West End, especially during the mule deer rifle seasons. Deer hunting is undoubtedly a significant outdoor recreation asset for Naturita and Nucla.

Other popular hunting opportunities near Naturita and Nucla include the spring turkey hunting season, and the desert bighorn sheep hunt in the Slickrock canyon of the Dolores River.

#### Fishing

We are familiar with rainbow, cutthroat and brown trout fishing opportunities in the rivers and reservoirs mentioned in the document, but not walleye or sunfish – interesting.

## Paddle Sports

We are very familiar with the lower section of the San Miguel and sections of the Dolores River from the confluence to Mesa Creek that are accessible from Naturita. In fact we have been working with the town of Naturita and the West End Development Corporation to improve public access to both sections of the river at the Naturita Town Park, Uravan Ball Park, and Bisquit Rock above Mesa Creek. Boaters from all over the West show up during the spring runoff to float these rivers and they need support from gas stations, grocery and liquor stores, shuttle companies, and campground or hotel facilities.

## Stakeholder Workshops

### Hunting

Our initial comments were primarily focused on avoiding key big game habitats in the proposed Nucla West and Nucla North areas, retaining remaining sections of relatively undisturbed lands in Saucer Basin, Hieroglyphic Canyon, and encouraging trail development in areas already impacted by numerous roads constructed by past mining activities. While this does improve hunting, it also conserves our wild lands and wildlife habitat.

## Recreation Asset Enhancement: West End Trails Proposal

In this section you describe both Trail Placement and Motorized Recreation for the Sawtooth and Naturita Flat Tops areas. Under Trails Placement, "Trails will take advantage of existing disturbances whenever possible while providing compelling mountain biking and hiking experiences". We strongly support this concept in this plan, and believe it is essential in limiting open road and trail densities to maintain wildlife habitat capability.

Under Motorized Recreation, "Existing open routes will remain open to motorized access". We intensely disagree with this statement, and request it be removed from this proposal. The West End Trails proposal is intended to be conceptual in nature, not a final decision. This may be your concept of what the eventual travel plan for this area will be, but that decision is exclusively under the authority of the Field Office Manager of the BLM Uncompahgre Field Office after completing their analysis under NEPA. There are many more environmental factors and consistency with management direction included in the recently revised Resource Management Plan that the BLM has to consider when making that decision. We don't support your conclusion on page 13 that this proposal is compliant with the current BLM Resource Management Plan for the region.

We believe that this statement on motorized recreation is misleading to the public and creates expectations that will likely become conflicts in the future. You need to be honest with yourselves and motorized users and say that some existing routes may be repurposed or converted to bike trails to meet the objectives of the BLM Resource Management Plan and this proposal.

In the Naturita Flat Tops area there is a map displaying a proposed seasonal closure from December 1 to April 30. In our experience, compliance with seasonal closures is minimal and unenforceable. The map shows existing roads in and adjacent to the proposed seasonal closure area which makes it unrealistic to implement. In addition, trails that are closed to mountain bikes are still used by hikers, trail runners, and skiers during the closure period. For those reasons we question the practicality of this mitigation measure, and we would anticipate year-round use throughout the entire polygon.

## Appendix A – Wildlife Analysis & RMP Compliance

The content of this analysis can be greatly improved. Please provide a narrative interpreting the CPW data on both elk and deer to better describe the wildlife resources, seasonal concentration areas, migration corridors, and other pertinent information. It would also be helpful to further explain the habitat values and efforts to resolve big game conflict resolution adjacent to Nucla to better explain the reasons these areas were dropped from consideration.

The items highlighted in your review of the current BLM Resource Management Plan are incomplete. The fact that this proposal is now located within the Paradox ERMA is one aspect of compliance. As previously stated, there are other applicable resource considerations and management direction that will also be considered under the NEPA process. For trails and wildlife those include such things as an analysis of open road & trail density, special analysis of habitat fragmentation, protection of T&E and special status species and their habitat, cumulative effects of recreation and other land uses.

#### Appendix B - Maps

The quality of the maps needs to be improved. They are not in focus and there are no legends to understand what the various colors of lines represent.

The connector trail from the Camp V trailhead to the Sawtooth trail system is not identified on any of the maps.  
Respectfully,

Craig Grother  
Craig Grother  
Regional Director - Central West Slope  
CO Backcountry Hunters & Anglers

Jesse Dudley  
Jesse Dudley  
Assistant Regional Director – Central West Slope  
CO Backcountry Hunters & Anglers

**From:** John Humphries <[Johntdog@gmail.com](mailto:Johntdog@gmail.com)>

Message Body:

As the owner of a San Miguel County bike touring business, Lizard Head Cycling Guides, I welcome the building of trails in the West End. During construction and in management if this trail network it will be important for the public lands administrators to permit guided outfitting on these trails. Since outfitters are out in the field and have a vested interest in protecting the landscape, guided mountain biking maintains a culture for both safe and responsible recreation. In this capacity, outfitters serve as trained medical 1st responders who can come to the aid of the general public and who serve as the eyes and ears for the public lands administrators.

In addition, during construction of any trail heads and parking areas, disturbance to all existing native vegetation should be minimized. Unfortunately, it has become standard during just about every trail head construction for the impact area to become far too large. Such disturbance to native vegetation leads to the inevitable growth of damaging invasive weeds at trailheads. To limit impacts during construction, the area to be developed must be clearly marked and any material brought in to be weed-free, to ensure that heavy machine operators are limited in their scope of disturbance. I am willing to participate further and to be contacted.

Keep on Rolling,  
John M. Humphries  
970.728.5891

**From:** Douglas Tooley <[douglas@motleytools.com](mailto:douglas@motleytools.com)>

Message Body:

Not much accessible detail in this report, but the general idea is good. I'm familiar with the Saucer Basin and the eastern end of the Sawtooths.

The Sawtooth area has been heavily impacted by mining. A balance of environmental restoration and historical preservation is needed.

Dispersed camping opportunities are large in the Sawtooths. Developing those areas on existing routes closer to EE22 should be part of the plan. This might take some road maintenance, I'm thinking the first 300' - but there may be opportunities farther in for a more social dispersed camping experience.

A usable trail map would be appropriate so the proposal could be checked on the ground and in detail. I have never been in the Flattops, but have visited other areas in the vicinity which are also suitable for trail development.

The area also needs cell/internet service, and this will be a big plus for the typical user.

**From:** Pete Davis <[PETEYD79@GMAIL.COM](mailto:PETEYD79@GMAIL.COM)>

Message Body:

The proposal laid out here is exceptional and will be an excellent cornerstone for developing the West End tourism economy. This area is poised to become very popular and this thoughtful proposal will help ensure a measured increase in traffic and utilization of the area's resources. I commend the efforts of WETA and all other entities that have coalesced around this very important effort. The West End needs this type of economy badly and I for one can't wait to utilize any new assets. Please consider this proposal to be the best way forward and see to it that it comes to fruition. Thank you.

**From:** Kelvin<[kelvin@veritassolar.com](mailto:kelvin@veritassolar.com)>

Hello Krystyna,

Overall I think this project is going in the right direction and is working very well to get input from all the stakeholders. I feel that to make the best decisions it is important to use the most accurate information available. To that end I have attached a few pages of the proposal with some markups that represent my comments.

Thanks,

Kelvin Verity

**From:** <[tcmurphy@crestedbutte.net](mailto:tcmurphy@crestedbutte.net)>

Thanks Krystyna, looks like a great plan. We're in Gunnison and understand the positive economic impact of promoting mountain biking and other outdoor sports.

You mention Fruita as a town that reoriented its economic drivers to mountain biking. Oakridge, Oregon is another such town that has done an incredible job of moving from the timber industry to mountain bike tourism.

Will the trails being built for bikes also be open to e-mountain bikes?

Thanks.

Tom Murphy

970.209.0486

## **Appendix A: Wildlife Analysis**

### Elk Migration

- Regarding potential conflicts with Elk habitat in these four Recreation Study Area polygons (Nucla North, Nucla East, Sawtooth Area, Naturita Flattops), none of the RSAs are affected by **Elk Migration Patterns, Elk Migration Corridors, Elk Summer Concentration Areas, Elk Summer Range, Elk Production Areas, Elk Limited Use Areas, or Elk Winter Range**.
- None of the RSAs are affected by **Elk Highway Crossings**, except a brief overlap on the northwest side of Sawtooth Area, about 1.5 northwest of the junction of SR 141 and CC Road. However, the portion of this RSA where it is crossed by SR 141 seems nonsensical so maybe that polygon is incorrect and doesn't actually cross SR 141 onto private property as indicated.
- None of the RSAs are affected by **Elk Resident Population Areas**, except +/- 890 acres of the northwest portion of the Sawtooth RSA in canyons descending towards the San Miguel River.
- All four RSAs are entirely affected by **Elk Severe Winter Range**.
- The Sawtooth Area RSA is not affected by an **Elk Winter Concentration Area**; the Naturita Flattop RSA overlaps +/- 160 acres with an Elk Winter Concentration Area at its southern edge; the Nucla East RSA overlaps +/- 2,160 acres with an Elk Winter Concentration Area over its western half; and the entire Nucla North RSA is affected by an Elk Winter Concentration.
- All four RSAs are entirely affected by **Elk Overall Range**.

### BLM Uncompahgre Field Office Resource Management Plan Revision

- The BLM's Uncompahgre Field Office Resource Management Plan (UFO RMP) Revision affects the RSAs in the following ways:
  - All four RSAs are in Coal Resource Potential Areas and all four RSAs are designated as Oil and Gas Potential High. All four RSAs are designated as "mostly Open to [oil and gas] Leasing With No Stipulations (timing stipulations may apply)." Some regions of the RSAs are partially zoned for Controlled Surface Use near roads and the towns of Nucla and Naturita.
  - Surface Disturbing Activities (i.e., mining, but presumably could also include trail building) are allowed as follows: approximately 400 acres in Nucla North RSA, approximately 1,500 acres in Nucla East RSA; approximately 200 acres in the Sawtooth Area RSA; and approximately 400 acres in the Naturita Flattops RSA. There are Active Uranium Exploration Sites in the Sawtooth Area RSA.
  - All four RSAs are entirely affected by grazing allotments.
  - I found no high conservation designations (ACECs, WSAs, LWC, etc.) in any of the four RSAs.
  - The entire Sawtooth RSA is within the designated as Paradox Valley Extensive Recreation Management Area (ERMA). None of the other RSAs are within ERMAs or SRMAs.
  - The UFO RMP revision's Travel Management provisions entirely affect all four RSAs (map below), and Travel Limited to Designated Routes. Approximately 1,500 acres of Nucla East RSA are affected by rights-of-way on its eastern and southern sides.
  - Visual Resource Management (VRM)<sup>17</sup> IV entirely affects Nucla North, Nucla East, and Naturita Flattops RSAs. Generally, a VRM IV objective means:

*To provide for management activities which require major modification of the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape can be high.*

*Management activities may dominate the view and may be the major focus of viewer attention. However, the impact of these activities should be minimized through careful siting, minimal disturbance, and repeating the basic elements of form, line, color, and texture within the existing setting.*

- This is the most permissive VRM class regarding allowable changes to the landscape.
- VRM II entirely affects the Sawtooth Area RSA. VRM II means:

*To retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.*

- This is the second-most protective VRM class regarding changes to the landscape.

## **Notes**

1. See <https://news.utexas.edu/2019/12/19/study-to-develop-a-new-economic-growth-model-for-rural-communities-in-west-texas/>
2. See <https://cfaes.osu.edu/news/articles/project-helping-ohio-communities-avert-bust-after-shale-boom>
3. See <https://extension.okstate.edu/fact-sheets/strategic-planning-for-economic-development-in-rural-areas-and-small-towns-of-oklahoma.html>
4. See <https://www.tristategt.org/nucla-station-retires-service>
5. See <https://tristate.coop/tri-state-announces-retirement-all-coal-generation-colorado-and-new-mexico>
6. See <https://www.nytimes.com/2012/06/29/us/energy-boom-turns-to-bust-in-colorado.html>
7. See [https://mltpa.org/images/downloads/fruita\\_economic\\_development\\_plan\\_june\\_2011-2.pdf](https://mltpa.org/images/downloads/fruita_economic_development_plan_june_2011-2.pdf)
8. See <https://www.choosewestend.org>
9. See [https://095f79d0-f003-49d2-8460-492ae48ef3a4.filesusr.com/ugd/21e8f9\\_927002860a074ba08a585fb9dd5dd69d.pdf](https://095f79d0-f003-49d2-8460-492ae48ef3a4.filesusr.com/ugd/21e8f9_927002860a074ba08a585fb9dd5dd69d.pdf)
10. See <https://cpw.state.co.us/Documents/Hunting/BigGame/HuntGuides/SWHuntGuide.pdf>
11. See <https://www.blm.gov/office/uncompahgre-field-office>
12. See <https://www.blm.gov/visit/search-details/272055/1>
13. See <https://www.fs.usda.gov/recarea/gmug/recreation/camping-cabins/recarea/?recid=81596&actid=50>
14. See [https://www.fs.usda.gov/wps/portal/fsinternet/cs/recarea?ss=110308&nav-type=BROWSEBYSUBJECT&cid=FSE\\_003738&navid=1102400000000000&pnid=1100000000000000&position=generalinfo&recid=32436&ttype=recarea&pname=Paradox%20](https://www.fs.usda.gov/wps/portal/fsinternet/cs/recarea?ss=110308&nav-type=BROWSEBYSUBJECT&cid=FSE_003738&navid=1102400000000000&pnid=1100000000000000&position=generalinfo&recid=32436&ttype=recarea&pname=Paradox%20)
15. See <https://www.hookandbullet.com/c/fishing-naturita-co/>
16. <https://mythcycles.com/2018/04/30/the-paradox-trail/?fbclid=IwAR2f-QD3mYfrXIHG-3f5vRk8T4gxDbu3do4mwjC1g00XGb-n0mtrX8-ztHnA>
17. See <https://www.blm.gov/programs/recreation/recreation-programs/visual-resource-management>

All Photos were submitted by Paul Koski except for the Kokopelli Trail in Fruita, CO.

Photo Credit: Fruita, CO <https://www.gofruita.com/thingstodo/kokopelli-biking-trails>