William D. Jochems

January 17, 2020

Shelly Grail Broadis

Recreation Manager

White River National Forest,

Carbondale, Colorado

 RE: Carbondale to Crested Butte 83 mile bike trail

Dear MS Grail Broadis,

 Thank you for providing a copy of the application by Pitkin County for approval to build a trail from Redstone to McClure Pass (Redstone-McClure) on property managed by the White River National Forest. I know that you have not yet started the scoping process, but I feel I must comment now, before you set boundaries on scoping, because how the boundaries are set, may have a significant affect on the Forest Service’s ability to conduct a complete and proper review, as required by the National Environmental Protection Act (NEPA).

 Pitkin County has asked the White River National Forest to approve an isolated segment, 7 miles long, plucked out of an 83 mile long trail project. The Carbondale to Crested Butte trail stretches through two National Forests, three Colorado counties, and four high mountain valleys. Not only is Redstone-McClure a small part (8%) of the whole, but it involves comparatively minor construction and utilizes existing roads and trails. If the Forest Service during its Environmental Assessment, is limited to those seven miles, the result might be a finding of no significant impact, which I in no way concede. If that finding, (FONSI in the jargon), were to be made, then the next step of review, the Environmental Impact Statement would not be required. Nothing would be considered south of McClure Pass or north of Redstone. No cumulative impacts beyond the seven miles would be considered, thereby sidestepping one of the main requirements of NEPA. This I submit, would be a grave mistake.

 The proposed trail north of Redstone contains up to 13 bridges back and forth across the Crystal River. By one of Pitkin County’s own estimates, the trail from KOA to Redstone, combined with Redstone-McClure would cost one hundred million dollars ($100,000,000). So the 7 mile segment in the application is part of a very large project. Nobody can spend one hundred million dollars, without a significant impact. Even if it is determined that the impacts of Redstone-McClure are not significant, an entirely different concern arises when Redstone-McClure is considered as part of the larger KOA to McClure Pass trail. The significant trail project north of Redstone will necessarily have a substantial impact on the segment in this application, Redstone-McClure. A reading of NEPA, and the related Code of Federal Regulations, would require the White River National Forest to focus on the larger picture, to assess the cumulative effect caused by this segment, and effect on this segment, as required by NEPA.

 The proposed trail south of McClure pass is within the jurisdiction of another agency, the Gunnison National Forest. but as you know, the White River National Forest is required to consider the actions of other federal agencies. The application does not provide any information about the trail south of the pass, so it is impossible to assess the impact of this segment on that segment, or that on this.

 The Forest Service is well aware of the problems arising from segmentation of a project into small parts and piecemeal review. These practices can make the cumulative environmental effect of the whole project impossible to assess, impossible to foresee. It was to avoid this problem that the federal NEPA regulations require a federal agency to look at the reasonably foreseeable extensions of what is immediately before it.

 The reason I write this letter is to urge the White River National Forest to require an Environmental Impact Statement, and view the Pitkin County application from the very start, *ab initio*, as a small part of a very large project. Please look up and down the trail, all the way down to Carbondale and all the way up to Crested Butte. Try to assess the cumulative environmental impact of the whole trail on these 83 miles of beautiful country.

Thank You,

William D. Jochems

Email copies to:

Scott Fitzwilliams, Supervisor, White River National Forest

Steve Child, Chairman, Pitkin County Commission

Gary Tennenbaum, Director, Pitkin County Open Space and Trails