

# *Crystal River Caucus*

*P.O. Box 870, Carbondale, CO 81623*

March 16, 2020

Scott Fitzwilliams,  
Supervisor, White River National Forest  
c/o Shelley Grail Braudis  
PO Box 309  
Carbondale, CO 81623

Dear Mr. Fitzwilliams,

On behalf of the Crystal River Caucus the Caucus Board of Directors is submitting the following scoping comments related to the Environmental Assessment of the Pitkin County recreation trail from Redstone to McClure Pass. The Crystal River Caucus is authorized by the County's Home Rule Charter as a recommendatory body to the Pitkin County Board of Commissioners. The caucus provides recommendations on land use applications and other matters of community interest within its area, which is the Pitkin County portion of the Crystal River valley.

We are concerned with the segmented approach of the County's proposal for an environmental assessment. The Redstone to McClure Pass segment is but a part of a much longer trail plan stretching from the KOA campground near Carbondale to Crested Butte. See <https://www.pitkinostprojects.com/carbondale-to-crested-butte-trail-plan.html>. The Caucus believes the NEPA process should include the entire trail corridor in order to appropriately assess the potential direct, indirect, and cumulative impacts to wildlife, riparian habitat, and stream health. The Caucus urges the Forest Service to recognize that the trail is the largest development project in our valley since the construction of Highway 133, and several studies have demonstrated potential significant environmental impacts.

Within the segment under discussion, two areas have already been identified as sensitive wildlife habitat: Bear Creek and McClure Pass (the old wagon road). The Caucus has been very consistent in recommending that the trail be located away from sensitive wildlife areas and instead be constructed within the highway corridor (see Attachment 1). As Crystal Valley residents, we treasure and advocate for the wild nature of our beautiful valley. Science and studies to date support our fiercely protective stance. Please see the attached letter written by 31-year veteran former District Wildlife Manager Kevin Wright (Attachment 2). In a more recent correspondence from Kevin to one Caucus board member he said the following, "We keep chipping away at wildlife habitat and at some point they need to take a look at the cumulative impacts from all projects and not just have an isolated eye on the one at hand. As I have always said and they refuse to answer, when is enough, enough?"

Also attached is the report of wildlife biologist Rick Thompson (Attachment 3). Thompson was hired by Wilderness Workshop to study the potential impacts of the proposed trail. Said Thompson, "The trail has the potential to affect about 875 acres of habitat if not constructed with best interests of wildlife in mind". Section 10.2 of the Appendices of the report shows maps developed by Colorado Parks and Wildlife of seasonal wildlife activity, including migration corridors, production areas, and important summer and winter ranges for 8 species. Those maps clearly indicate that both trail alignments proposed by the county will impact wildlife throughout the valley.

Potentially significant impacts to the Crystal River from trail and bridge construction contained in the trail plan could well escape any environmental review at all if the Forest Service NEPA review is limited to just the segment proposed for review. The river is clearly not a segmented environment. The County's Trail Study March 2018 Environmental Assessment itself identifies the potential for up to 14 bridges associated with its Trail plan, and states that "new bridge abutments could result in impacts to wetlands, riparian habitat, or stream function." In an

*Chair: John Emerick, Vice Chair: Bill Argeros, Directors: Stacy Bernot, Edie Engstrom, Margaret Hammel, Kate Hudson, Maciej Mrotek, Phil Youngman*

independent assessment by Mark Beardsley (Attachment 4) many of these bridges would have significant impact on the river.

The County has also identified the following potential impacts to aquatic resources from construction of the Carbondale to Crested Butte trail in their 9/28/2017 response to the Pitkin County Healthy Rivers Board (Attachment 5) where they say, "Based on this existing stream condition, the potential impacts of trail implementation within and along the Crystal River stream channel and floodplain stem from new structures or hardening (e.g., riprap, walls, bridge abutments, or piers) that further degrade or constrict the stream channel, or result in a significant loss of wetland and riparian habitat."

The County's detailing of potential impacts includes 1) up to about 75 acres of existing riparian vegetation that would likely be removed to make way for the trail bench, with little opportunity for revegetation and mitigation, and most of which would be adjacent to the Crystal River; 2) challenging trail design solutions along the narrow strip between the highway and the streambank would require about 11,300 feet (2.1 miles) of new riprap, walls, piers, or other hardened structures which would further incise and degrade stream function in affected areas; 3) new construction and excavation along the Crystal River streambank, and in some cases within the channel, would increase erosion and sedimentation and the potential for impacts to water quality and in-stream habitat.

Given all of the potential environmental effects of constructing the proposed Carbondale to Crested Butte Trail discussed above and in the attached documents, The Crystal River Caucus Board respectfully requests that the Forest Service evaluate the potential environmental effects of not only the Redstone to McClure trail segment, but also all connected and reasonably foreseeable future actions related to the County's planned construction of the entire Carbondale to Crested Butte Trail in the process of assessing the environmental impacts of the proposed action. If the Forest Service's initial environmental review identifies one potential significant environmental impact to any resource, riparian, river, wildlife or any other, the Caucus urges you to conclude that the issuance of a FONSI is not justified and the preparation of a DEIS is required. By segmenting the NEPA process, full assessment of cumulative impacts is not possible and a finding of no significant impact (FONSI) is more likely.

Thank you for your consideration of our comments and the documents we have attached.

Sincerely,



John Emerick  
Chair, Crystal River Caucus

Attachments:

- Attachment 1: Crystal River Caucus Trail Resolution, July 25, 2018
- Attachment 2: Kevin Wright – Wildlife Impacts: Crystal Trail Draft Plan, June 6, 2018
- Attachment 3: Crystal River Trail Wildlife Report 2017-07-09
- Attachment 4: Beardsley Crystal River Assessment, November 8, 2017
- Attachment 5: OST response to HRSB, November 28, 2017