



Colorado Chapter

1536 Wynkoop Street, 4B-1, Denver, CO 80202 | 303.454.3362 | www.rmc.sierraclub.org

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

3/16/19

Dear Mr. Fitzwilliams,

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club has more than 2.2 million members and supporters nationwide, including more than 110,000 Coloradans. Although we are comprised of a diverse population, the tie that binds us is our commitment to conserving those places, processes and organisms that will sustain our natural heritage with all of its biological diversity.

The Executive Committee for the Roaring Fork Group of the Colorado Chapter of the Sierra Club would like to submit the following comments as they pertain to the NEPA review of the Redstone to McClure Pass segment of the Carbondale to Crested Butte Trail. We are very concerned with the segmented approach as proposed by Pitkin County. In order to appropriately assess the potential direct, indirect, and cumulative impacts to wildlife, riparian habitat, and stream health, as stipulated by NEPA, this study should include the entire trail corridor. Potentially significant impacts to additional important habitat areas affected by the overall trail plan could well escape any environmental review at all if the NEPA is limited to just the segment proposed for review.

Within the segment under discussion (Redstone to McClure Pass), two areas of proposed trail construction have already been identified as sensitive wildlife habitat – the Bear Creek area and the old McClure Pass switchbacks. To date, wildlife scientists have been very consistent in recommending that the trail be located away from sensitive wildlife areas and instead be constructed within the highway corridor. In a report regarding potential wildlife impacts resulting from the proposed trail, wildlife biologist Rick Thompson says, "It would be best if the trail could follow the alignment of Highway 133 for the entire 20 miles. The human activity on the road already creates a "zone of influence" between 100 yards and a quarter mile that isn't used as wildlife habitat." A trail above the Bear Creek falls could further compromise 111 acres of habitat for elk, peregrine falcon, and countless additional native wildlife species. The old McClure Pass Road switchbacks area has also been identified to include 223 acres of habitat areas for elk, bald eagle, black bear, and moose.

The Colorado Chapter of the Sierra Club opposes the development of any new trails into intact landscapes because these trails contribute to the fragmentation and loss of native habitats and consequent loss of native species. That recreational trails disturb wildlife and can lead to habitat loss and declines is well established in the scientific literature. Many once common native species are on the decline in the Roaring Fork Watershed due to human induced habitat alteration and disturbance. Retired local wildlife manager Kevin Wright has been vocally opposed to development of the Carbondale to Crested Butte trail where it impacts habitat. Says Kevin, "When is enough, enough?"

Based on decades of credible scientific documentation, we believe that the environmental impacts of the proposed trail will significantly and negatively impact native wildlife. We oppose this development and respectfully request 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, we urge 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.

Respectfully Submitted,

Roaring Fork Group, Colorado Chapter of the Sierra Club.