

March 20, 2020

TWO SHOES RANCH

Scott Fitzwilliams, Forest Supervisor

c/o Shelly Grail Braudis

PO Box 309

Carbondale, CO 81623

Submitted via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=56913>

Dear Forest Supervisor Fitzwilliams;

Please accept this correspondence regarding the Notice of Proposed Action for the Redstone to McClure Pass Trail Project. After attending the open house on January 28th please review the following observations regarding the project:

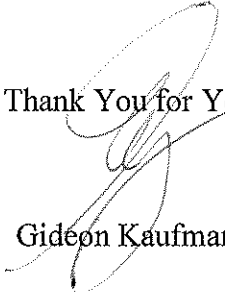
1. Consistency with the Forest Plan and Travel Regulations. This segment of the Carbondale-to-Crested Butte Trail will introduce a significant increase in human use and presence in area that currently sees little use. The existing trail is a narrow single-track that, according to the White River Forest Travel Management Plan, has been decommissioned. Chapter 2, page 30 of this plan states that the goal of decommissioning is to “*remove routes from the landscape and return them to a natural state*”. This proposed project does not do that and instead proposes improvements to the trail that will significantly increase the human presence in an area where little human interaction currently exists. This action could end up fragmenting the wildlife habitat known to exist along the McClure Pass wagon road and in the Bear Creek area. The Forest Service should explore alternatives that avoid if possible or mitigate impacts of the proposed trail. The Forest Service should describe how this proposed trail segment is consistent with the Forest Plan.
- 1) Stand Alone Trail. Although touted as a “stand alone” trail, one must consider the Crystal River Trail Study recently adopted by the Pitkin County Board of Commissions. The study clearly defines this project as one of several segments of a 63-mile trail from Carbondale to Crested Butte. As such, the cumulative impacts of the entire trail, not just this segment, should be analyzed thoroughly through this process, and the EA should determine that this trail segment stands on its own and is in fact an independent segment. In addition to cumulative impacts, the Forest Service needs to make sure the process and decisions made through it are the right ones, not just for this segment, but for all segments of the trail that cross federal lands. Decisions made for this segment will likely set precedent for future segments and therefore requires extensive and comprehensive study.
- 2) Lack of Alternatives Analysis. Other alternatives should be considered, especially since an alignment along the highway seems very feasible and would have less environmental impact. NEPA requires all reasonable alternatives to be evaluated, and this evaluation should be done with the criteria that reflect the Forest’s goals and priorities, not just the Proponents. Another possible alternative would be to construct to the trail to the subdivisions south of Redstone but leave the remaining section to McClure Pass in its current state. In addition to these alternatives, a “no action” alternative must also be considered.

- 3) Cumulative Impact Analysis. A comprehensive cumulative impact analysis is needed for both this section of the trail and the total Carbondale to Crested Butte Trail. What are the existing recreational opportunities in the area and how do they currently impact resources such as wildlife? How would the trail further impact these resources given the existing recreational use? How much recreational access is too much? Given the Proponents schedule and funding to complete the Pitkin County portion of the Carbondale to Crested Butte Trail, construction of the entire trail is certainly a “reasonably foreseeable action” and as such should also undergo a full impact evaluation before this trail section can be approved.
- 4) Recreation Impacts on Wildlife. According to many experts, the recreational carrying capacity of the Crystal River valley is reaching its limits. Increased recreation is creating fragmentation and many believe there is a direct correlation between increased recreational uses and the decline of the elk, deer, and bighorn sheep population in the Crystal River Valley. A growing body of research has revealed that even low-impact recreation such as hiking and cross country skiing can startle or disturb wildlife, forcing them to burn energy reserves or experience stress. More active recreation, such as mountain biking, fat tire winter biking, ebikes, or group treks have an even greater impact. Another finding was that trails create a “corridor of impact” wider than the trail itself: wildlife reacts to humans 100 meters or more away on either side of a trail, not just on the trail itself. The impact distance of social or side trails was even farther. Some areas of the Forest need to be completely off-limits in order to ensure that wildlife can relax and live without human intervention. In addition, human travel corridors should be compact and combined where possible. Placing the trail on an alignment near the highway would reduce the zone of human influence substantially. A full investigation should include a fragmentation analysis, determining indirect impacts such as social trail development, and as mentioned above, a cumulative Impact analysis.

Local groups have spent a lot of time and funds working to ensure the survival of the Sopris Bighorn sheep herd, which is in severe decline. This trail analysis should look at alternatives that do not negatively impact restoration options for the big horn sheep in this area. Human access to new areas and social trail development must be carefully analyzed. With regard to Bighorn sheep, it is known that a new human presence creates high levels of stress in the animals, causing changes in energy expenditure and promoting reduced survivorship through disease and predation.

- 5) Wait for publication of Watershed Biodiversity Study. The Forest Service should strongly consider deferring this project until the Roaring Fork Watershed Biodiversity and Connectivity Study is complete. The study will provide valuable data and resources which are essential to the review of this particular project by identifying high priority habitats and zones of existing and potential connectivity where conservation actions can be most effective. It is important not to limit the Forest Service review to a single trail alignment, but rather to look at the overall picture of the Crystal Valley as the Roaring Fork Watershed Biodiversity and Connectivity Study does. This study is a collaborative investigation involves a Science Team of key stakeholders: U.S. Forest Service, Bureau of Land Management, Colorado Parks and Wildlife, Aspen Valley Land Trust, Aspen Center for Environmental Studies, Aspen Global Change Institute, Roaring Fork Conservancy, and the Proponent, Pitkin County Open Space and Trails. The study will provide invaluable information to assist the Forest Service in its review of this project. The study will be the “best available science” for the protection and stewardship of the watershed. The study will help identify impacts on wildlife, which might occur if the current trail alignment is approved and is necessary for an accurate picture of a proposed trail’s impact on wildlife.

Thank You for Your Consideration,



Gideon Kaufman

cc Via Email:

Pitkin County Board of County Commissioners

c/o George Newman via email at george.newman@pitkincounty.com

c/o Greg Poschman via email at greg.poschman@pitkincounty.com

c/o Patti Clapper via email at patti.clapper@pitkincounty.com

c/o Kelly McNicholas Kury via email at kelly.mcnicholas@pitkincounty.com

Steve Child via email at steve.child@pitkincounty.com

Pitkin County Open Space & Trails - Trustees

c/o Graeme Means

c/o Howie Mallory

c/o Amy Barrow

c/o Michael Kinsley

c/o Wayne Ives

Pitkin County Open Space & Trails – Director

c/o Gary Tennenbaum via email at gary.tennenbaum@pitkincounty.com

Pitkin County Manager

c/o Jon Peacock via email at Jon.Peacock@pitkincounty.com