

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

Roaring *Fork* Audubon



Dear Supervisor Fitzwilliams,

Roaring Fork Audubon submits the following comments regarding the NEPA review of the proposed Redstone to McClure Pass segment of the Carbondale to Crested Butte recreational trail. Roaring Fork Audubon is opposed to Pitkin County's proposed trail alignment for three fundamental reasons: 1) Feasible alternatives to the proposed location have been identified which do not encroach into public lands and wildlife habitat; 2) Assessing only one small segment of a much larger trail development project does not adequately analyze the cumulative impacts to the Crystal River Valley from this very substantial development project; and 3) development-induced impacts to natural communities, including bird communities, will contribute to habitat loss and consequent declines in local wildlife populations.

1. Feasible alternatives to the Pitkin County's proposed trail location are present which do not result in loss and fragmentation of the public's National Forest lands. An engineering assessment of the Highway 133 corridor conducted by Newland Project Resources Inc.¹ concluded that a recreational trail could be constructed entirely within the Highway 133 corridor and thus would not need to encroach into wildlife habitat and public land.

2. Impacts of the entire trail system, not merely one segment of the trail, should be considered. Cumulative impacts of the entire trail system greatly exceed the impacts of just this one segment. Thus, the entirety of the impacts must be considered to accurately analyze the overall impacts to the Valley and its upland and riparian ecosystems. Impacts to upland ecosystems will inevitably alter stream and riparian ecosystems. Loss or alteration of riparian and stream systems will impact native wildlife that requires both riparian and upland ecosystems during their life history.

Evaluating the cumulative impacts of the entire trail development reveals that thirteen full-span bridges would cross the Crystal River to accommodate the trail. According to a report from hydrologist Mark Beardsley², these bridges confine the river by consolidating flows through spans that are typically narrower than the natural width of the valley and floodplain. He goes on to state that, regarding the impacts to riparian and stream health from the recreational trail, the bridges present the greatest risk of impacts to river health by the proposed trail.

3. The proposed Redstone to McClure pass trail alignment would encroach into two high-quality wildlife areas, Bear Creek and McClure pass switchbacks. Each of these areas provide habitat for a high diversity of native songbirds and raptors as well as native ungulates (elk and mule deer) that are all on the decline primarily due to habitat loss, alteration and disturbance. Each of these areas has been identified as habitat that is particularly important to native wildlife³. Bird abundance in North America has declined by almost 3 billion individuals since 1970⁴. Anthropogenic habitat loss, alteration and disturbance is the primary culprit of these declines. Decades of peer-reviewed scientific literature document the negative impacts that recreational trails have on bird communities through their introduction of human disturbance, fragmentation, and enabling the invasion of non-native species. Given the dramatic declines of native wildlife species throughout North America and in the Roaring Fork Watershed, protecting these last habitats from human development-induced disturbance is essential to maintaining biological diversity.

From Colorado Parks and Wildlife biologist to private consultants, every credible wildlife biologist, has voiced their opposition to Pitkin County's proposed alignment of the recreational trail through wildlife habitat.

In his report to Wilderness Workshop³, wildlife biologist Rick Thompson said, "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". He goes on to state that in the old McClure Pass switch area "there are important wildlife habitats (though none designated as critical by CPW) that are bisected by the switchbacks that could be negatively affected by increased trail use, including breeding birds and the elk, bald eagle, black bear, and moose habitats".

Kevin Wright, retired CPW District Wildlife Manager, has voiced his opposition to development of the Carbondale to Crested Butte trail where it impacts wildlife habitat. Regarding the Bear Creek and McClure Pass sections of this segment he makes the following observations and recommendations⁵:

"Bear Creek - this area contains elk winter range and most likely some limited production. It also contains bear denning sites. There is very little disturbance in a fairly high quality habitat. One cannot assume limited winter use as ERO states. Once the trail is built/advertised there will most likely be a substantial increase in use during winter and spring transition. This will negatively impact elk during winter and spring transition. This is an area there should be no dogs allowed during winter and spring transition if B alignment is selected. From a wildlife perspective, "A" (highway) alignment would have much less impacts. "A" (highway) alignment should be selected.

McClure Pass - This area contains some high quality habitat and elk winter range. Winter use by elk is limited depending upon the winter. It would be best to keep the disturbance along an existing highway disturbance corridor. "A" (highway) alignment would be preferred to minimize impacts".

Decades of scientific research document the negative impacts that recreational trails have on wildlife. Given the loss of habitat due to impacts of human development in the large majority of the Roaring Fork Watershed, as indicated by dramatic declines of elk and mule deer, maintaining the integrity of the remaining landscapes to provide protected habitat for wildlife is essential to their long-term viability.

Roaring Fork Audubon opposes Pitkin County's proposed alignment of the recreational trail through Bear Gulch and the old McClure Pass highway switchbacks. We recommend that the recreational trail be developed within the existing Highway 133 corridor. We urge you to conclude that a Finding of No Significant Impact is not justified. Rather, we urge you to find that the proposed developed must undergo an Environmental Impact Statement process.

Respectfully submitted,
Vice-chair, Roaring Fork Audubon

Delia G. Malone

REFERENCES

1. Newland Engineering Resources, Inc. 2019. Carbondale To Crested Butte Trail Independent Review of the Engineering Feasibility Report.
2. Mark Beardsley. 2017. Impacts of the Carbondale to Crested Butte Trail on health of the Crystal River EcoMetrics.
3. Richard W. Thompson. 2017. Crystal River Trail Preliminary Wildlife Analysis, Pitkin County, Colorado. Western Ecosystems, Inc., 905 West Coach Road, Boulder, Colorado 80302.
4. Kenneth V. Rosenberg, Adriaan M. Dokter, Peter J. Blancher, John R. Sauer, Adam C. Smith, Paul A. Smith, Jessica C. Stanton, Arvind Panjabi, Laura Helft, Michael Parr, Peter P. Marra. 2019. Decline of the North American avifauna. *Science* 366, 120–124.
5. Kevin Wright. 2018. Letter submitted to Pitkin County Open Space and Trails RE: Crystal River Trail Draft Plan.