



DATE: March 23, 2020

Scott Fitzwilliams, Supervisor, White River National Forest
Attention<shelly.grail@usda.gov>Shelly Grail Braudis
PO Box 309 Carbondale, CO 81623

Dear Supervisor,

I am writing as the Executive Director of the Watershed Biodiversity Initiative (WBI), an organization currently orchestrating the Roaring Fork Watershed Biodiversity and Connectivity Study (Biodiversity Study). As you know, the Forest Service is a key stakeholder in this study that was framed and is being guided by a Science Team made up of the US Forest Service, Bureau of Land Management, Colorado Parks and Wildlife, Pitkin County Open Space and Trails, Aspen Valley Land Trust, Aspen Center for Environmental Studies, Aspen Global Change Institute, and the Roaring Fork Conservancy.

My comments here represent WBI and do not presume to represent the agencies and organizations listed above; the Science Team. Our concern is that NEPA for the proposed trail should incorporate the findings of the Biodiversity Study to be defensible by incorporating the best available science.

The Roaring Fork Watershed Biodiversity And Connectivity Study takes a landscape-scale approach to identify high quality habitat for Bighorn sheep, elk, and deer as proxies for biodiversity generally. There is broad consensus among Biodiversity Study stakeholders that a landscape-scale approach provides the most defensible context for accomplishing biodiversity conservation in our 930,000-acre watershed as well as for assessing proposals such as the Crystal Trail.

The Biodiversity Study anticipates coming to a conclusion by February 28, 2021. The conclusions will be rendered on a landscape scale, the 930,000-acre Roaring Fork





Watershed. The Biodiversity Study is focused on elk, deer, and bighorn sheep because they are three well studied focal species with large habitat requirements and rich records of historical data.

There is broad agreement in the science community that a landscape-scale perspective can be far more instructive and useful to agency decision-makers such as USFS than narrowly focused studies that don't holistically consider the implications of an action on the greater landscape.

At the January 28 Forest Service open house in Carbondale regarding the Crystal River Trail proposal, I spoke with the consultants working on the NEPA analysis for the trail proposal. I understood that their analysis would be limited to the trail corridor, would not take a landscape-scale perspective, and would be completed in 2020.

A serious concern discussed within our organization (WBI) is that if the NEPA analysis and the Biodiversity Study are out of synch in timing, that both the Forest Service and WBI/The Biodiversity Study would be exposed to criticism; The Forest Service for not allowing time to incorporate a landscape-scale perspective from the Biodiversity Study that the USFS participated in framing, and WBI/The Biodiversity Study for not defending the importance of the Study for informed decision-making.

WBI's position on the proposed Crystal River Trail is to strongly recommend that the NEPA process include and be informed by the findings and conclusions of the Roaring Fork Watershed Biodiversity and Connectivity Study. Concluding NEPA in 2020 would not accommodate this recommendation, exposing both WBI and the USFS to criticism.

I appreciate your consideration of these concerns. I know we share an interest in the common good for our community, our visitors, and for biodiversity.

Sincerely,

Tom Cardamone, Executive Director, Watershed Biodiversity Initiative

