

Swan Mtn Project comments
Submitted electronically on 12/14/21

Dear Mr. Bianchi and Ms. Nettles

Please accept and consider the following comments on the proposed Swan Mtn Project as described in the Notice of Proposed Action (NOPA) on behalf of the Quiet Use Coalition and Rocky Mtn Recreation Initiative.

Our members have visited and are familiar with the project area, and traveled on some of the designated routes within the area.

Protect Wildlife Habitat from trail impacts

The latest Colorado Parks and Wildlife (CPW) species habitat GIS data indicates that there are elk production areas, elk winter concentration areas, elk summer concentration areas and elk winter range within the project area that require consideration.¹

Note that this newer 2021 GIS data appears to indicate different elk habitats than that recorded as occurring in these areas as captured in the 2002 White River Forest Plan in Table 3-6 at 3-63 and 64, and Figure 5 Elk Habitat Map 5 at 3-69 for Polygon ID numbers 39 and 40. Areas within Polygons 39 and 40 now are considered to contain extensive elk summer concentration areas, according to current CPW GIS data. Areas within Polygon 40 contain elk production (calving) areas according to that GIS data. The most recent elk habitat data must be used when considering new project proposals.

Campion Trail comments

It appears as though new trail is proposed to be constructed over 440 yards from existing trails in some locations, as depicted in Figure 2 of the Notice of Proposed Action (NOPA). This type of proposed new trail construction is well beyond the generally acceptable distance from the current trail that are considered acceptable as a minor trail reroute. We thus believe that these new segments of trail proposed to be constructed must be analyzed and evaluated separately, and not be considered as inconsequential realignments of existing designated trails.

The majority of the proposed new trail construction for the Campion Trail #9021 will occur in previously undisturbed CPW identified elk production area, summer concentration area, and winter range habitats located hundreds of yards from the existing trail. The impacts of adding new trail in these significant habitat areas must be fully considered.

We question numbers contained in Figure 4 of the NOPA, which suggest that the overall length of this trail will only increase by 1/10 of a mile. Figure 2 of the NOPA indicates numerous new trail segments

¹ Colorado Parks and Wildlife, 2021. CPW Species Activity Mapping GIS data for elk and mule deer. Accessed online December 2021 via <https://www.arcgis.com/home/item.html?id=804abf2794b346828eef285bffe9259> and <https://www.arcgis.com/home/item.html?id=e10b0db0167a4dde909357b5c13354f1>

are proposed to be constructed at distances well away from, and then additional distances returning toward, the existing alignment of this trail. These long segments appear to be longer less steep trail switchbacks replacing shorter steeper current trail segments. This suggests that the overall length of the trail will be increased significantly.

In addition, information on this trail posted on the White River National Forest website² indicates this trail is 2.4 miles long, not 2.7 miles long as stated in Figure 4. Regardless of the actual current length of this Trail, Figure 2 suggests that the overall length of this trail will increase significantly with the proposed new trail construction.

We have found that the actual lengths of purpose built trails constructed almost always are much greater than those lengths proposed in plans and decisions. Trail planners and construction crews tend to add extra deviations from proposed route alignments to avoid significant obstacles, include new trail features, and/or make trails more sustainable. All of this additional trail length adds up to fragment more habitat and increase the time during which humans are present in priority wildlife habitats when traversing those trails.

We are especially concerned about the addition of extra trail distance being proposed south of the existing trail near 39°32'59.49"N 106° 0'51.62"W. This new trail will be constructed within an elk production area that is also an elk summer concentration area and elk winter range. The presence of additional trail distance in these habitats will fragment more land within these areas, resulting in additional impacts to elk. A longer trail in these areas will require more time for users to travel over, increasing the time trail uses spend in these habitats and thus increasing their adverse impacts to elk.

We also have concerns about increasing the type and volume of use on this trail with proposed modifications. The existing steeper trail discourages some users, especially mtn bikers who may not have the skills or fitness to ride over the existing steeper trail. Mtn bikers generally consider this a difficult trail to ride due to the steep climbs.³ Creating new trail that is easier for mtn bikers to use will increase bike use on this trail. This increased bike use is likely to displace hikers. Bicycle use has been shown to displace elk further from trails than hiking use.⁴ Increasing bike use on this route will displace elk further from this trail, compressing the amount of viable elk habitat available in this area.

Numerous studies indicate that elk generally do not habituate to human use in the form of hiking or mountain biking, and that the presence of trails displace elk even when the trails are not being used. The designation of a new trail in this area will dramatically increase human use in this area resulting in year round displacement of elk from important habitat areas vital for their survival. Elk have learned to avoid and have been displaced from the area around the existing Campion Trail. Even if the existing trail is proposed to be decommissioned and rehabilitated, it may take years for elk to return to using that

² Campion Trail 9021 at <https://www.fs.usda.gov/recmain/whiteriver/recreation>

³ MTB Project 2021. Trail rating for Vomit Hill (Campion Trail). accessed online Dec 2021 via <https://www.mtbproject.com/trail/5726431/vomit-hill>

⁴ Wisdom, M. J., H. K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk response to trail based recreation on public forests. *Forest Ecology and Management* 411 (2018) 223-233

habitat. Decommissioning and rehabilitation may not prevent continued human use of that route and thus elk will continue to avoid the area around the current trail.

According to information on this trail posted on the White River National Forest website⁵, this trail is open to year round hiking use. There are no seasonal closures in place to limit impacts to wintering and or calving elk from use of this trail, as suggested as a guideline in the Forest Plan at 3-62. Studies indicate that hiking use displaces elk just as all other uses do, and the displacement of elk from any type of human trail use is greater than the different displacement distances of different uses.⁶

This new trail construction is proposed to be constructed in a 5.41 Management Area, to be managed with the primary emphasis on elk and elk habitat. We believe this proposal must emphasize preservation and protection of elk and elk habitat much more so than recreational user experiences that the proposed new trail construction on the east end of this trail appear to emphasize.

This proposed new trail constructions is counter to the 2021 Colorado Planning Trails with Wildlife in Mind document, which recommends avoiding, to the maximum extent possible, constructing new trails within elk production areas and elk winter range.⁷ US Forest Service Region 2 Trails Lead Chad Schneckenburger and South Zone Wildlife Biologist Melissa Dressen were members of the Task Force that developed this document, and they agreed to unanimous consensus and enthusiastic support for the document and the recommendations contained in it.⁸

That document also recommends limiting trail densities to one mile per square mile of elk production habitat, whereas this proposal will increase trail densities in that habitat by constructing new trail closer to the Hippo Trail 9015 and the Continental Divide National Scenic Trail.

The NOPA states that these proposed trail modifications are meant to avoid resource sensitive areas, but elk production areas are apparently erroneously not fully considered.

The NOPA also states that the proposed trail actions are meant to enhance watershed health. However, the current eastern segments of trail proposed to be relocated are all well over 700 feet from the nearest waterway and thus unlikely to directly affect that waterway.

⁵ Campion Trail 9021 at <https://www.fs.usda.gov/recmain/whiteriver/recreation>

⁶ Wisdom, M. J., H. K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk response to trail based recreation on public forests. *Forest Ecology and Management* 411 (2018) 223-233

⁷ Colorado Trails with Wildlife in Mind Taskforce. (2021) Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado. Pages 27 and 44. Accessed online December 2021 via https://cpw.state.co.us/Documents/Trails/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf

⁸ Colorado Trails with Wildlife in Mind Taskforce. (2021) Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado. Appendix D Accessed online December 2021 via https://cpw.state.co.us/Documents/Trails/Appendix_D_Planning_Trails_with_Wildlife_in_Mind.pdf

Elk are already heavily impacted by private land development and designated/dispersed recreational use in this area. It is vitally important to protect priority elk habitat by avoiding additional fragmentation and use in those areas.

Red Trail comments

Given that this new trail is to be constructed in a 5.41 Management Area where elk winter range is the primary emphasis, new trail proposals must consider elk impacts above other impacts.

Proposed relocation of the Red Tail Trail #9018 will move this trail from outside a CPW elk production area into the center of a production area. This relocation will significantly affect over 250 acres of this elk production area. Relocating this trail to a higher elevation as proposed will place the trail above, rather than below, the current trail. This will result in additional impacts to elk, as prey species generally react more strongly to potential threats that are above them as opposed to potential threats below them. Since vegetation units 114, 115, 116 and 117 are all proposed to be cleacut, the impacts of the sights, sounds and smells of trail use are likely to be more detectable by elk after almost all screening vegetation and the cover it provides is removed.

New trail is proposed to be constructed in CPW identified elk winter range, an elk winter concentration area and elk severe winter range. The relative benefits to wintering elk from relocating this trail away from Soda Creek and that riparian habitat to locations higher up the ridge are debatable. Yet is is undeniable that the new proposed trail will affect both elk winter habitat and elk calving areas, whereas the current location only impacts elk winter habitat.

The 2021 Colorado Planning Trails with Wildlife in Mind document recommends avoiding, to the maximum extent possible, constructing new trails within elk production areas, elk winter range, elk winter concentration areas and elk severe winter range.⁹ The new Red Tail Trail location fails to consider all four of those recommendations.

Similar to the Campion trail, elk have learned to avoid and are displaced by the existing Red Tail trail alignment area. Even if the existing trail is decommissioned and rehabilitated, it will take years for elk to fully reoccupy that habitat. The use of this segment of trail as the T114 temporary road will result in additional adverse impacts to elk that will linger longer and be more difficult to reverse.

Impacts to Soda Creek and the surrounding riparian habitat may be reduced by relocating this trail away from the Creek, but this area will continue to receive impacts from anglers, hunters, and others drawn to the Creek. It will be difficult to prevent continued use of the existing trail even if it is decommissioned and rehabilitated.

This trail is apparently not closed to winter use, as the Forest Plan Guideline at 3-58 suggests it should be.

⁹ Colorado Trails with Wildlife in Mind Taskforce. (2021) Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado. Pages 27 and 44. Accessed online December 2021 via https://cpw.state.co.us/Documents/Trails/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf

We also question how this trail distance can be proposed to be shortened from 2.8 miles to 1.4 miles as suggested by Figure 4. A straight-line distance between the end of the Red Trail at the Soda Ridge Trail intersection to the other end of the Red Trail at the Continental Divide Trail is almost 1.8 miles. Figure 2 does not suggest that the proposed new segments of this trail would reduce the distance of this trail significantly.

Soda Mine Trail Comments

The Soda Mine Trail #9126 is proposed to be extended into an elk production area whereas the present alignment is primarily outside of this area. Extensive additional distance of this trail is being proposed to be created in elk severe winter range. This is all in direct opposition to recommendations contained in Planning Trails with Wildlife in Mind.

New Soda Mine Trail is proposed to be constructed in CPW identified elk production areas.

While we agree with Figure 4 that the overall length of this trail will increase, we believe the extensive new trail construction proposed in Figure 2 suggests an increased length of greater than .48 miles.

We are not familiar with this trail and it is not included in any existing trail maps or reviews, so we presume that new trail connections are being proposed.

Trail recommendations

We recommend no new trail be constructed within elk production areas. Minor reroutes within 100 feet of existing trail should be considered instead of the extensive and lengthy new trail construction that is being proposed.

If new trail absolutely must be constructed in elk production areas, those segments of trail must have hard seasonal closures associated with them that prohibit all human use between May 15 and June 30 to avoid disturbance of elk calves and mothers.

Any new trail constructed within elk winter concentration areas or severe winter range must be seasonally closed to all users from December 1 through April 30.

New trails constructed in elk summer concentration and or production areas must require that dogs be on a leash at all time

Decommissioning and rehabilitation of any existing trail must include hard trail closure. Hard trail closures must include an order that specifically prohibits human use of those trails, installation of educational signage and structures (locked gates and associated fencing to deter gate bypass) and regular monitoring/enforcement of those closures.

New trail segments must not be opened for use until old trail segments are fully closed to human use and properly decommissioned and restored on the ground (including hard closure, recontouring, revegetation, etc.). It will require an equal or greater effort to effectively close and decommission existing trail segments than required to construct new trail.

New trails must not be approved unless a known and viable citizen group makes a documented commitment to construct, maintain, and comprehensively manage most aspects of the presence and use of those trails. The USFS does not have the capacity, staff or funding to comprehensively manage trails on their own. Comprehensive management includes many things beyond trail construction and maintenance. It includes management of things like sign installation and maintenance, monitoring, trailheads, trail related littering, dispersed camping, human waste, off leash dogs, conflicts, unauthorized route creation/use/control, closing/decommissioning old trail segments, etc.

If all this new trail construction is approved, some form of compensatory mitigation must be specified to balance the additional detrimental impacts that will occur to elk calving and winter range due to the presence and use of these new route. To better balance recreational use with wildlife, fair and equal compensatory mitigation should permanently close, decommission and rehabilitate a similar length designated trail that passes through elk production and winter concentration areas. Significant permanent habitat preservation and enhancement work that might increase and enlarge the effectiveness of other existing elk production and winter concentration areas might also be considered. These types of compensatory mitigation requirements are necessary to stabilize and reverse the decline of wildlife populations due to increased recreational use and trails. It will take these types of compensatory mitigation for the public to more fully understand the full costs of adding new trails in priority wildlife habitats, and to understand what is required to offset those costs.

Protect the CDNST corridor

The NOPA fails to consider fully consider retention of scenic integrity retention in the fore ground as viewed from the Continental Divide National Scenic Trail.

The proposed 250-foot distance from the CDNST for scenic integrity vegetation treatments does not fully capture the specified and defined one half mile (2640 feet) foreground as viewed from the trail.

While we support a proposal to improve scenic integrity and user experiences on this trail, and to apparently correct errors made in 2010 and 2012 vegetation treatments, we believe the project must fully consider all scenic resources along this trail.

The Continental Divide National Scenic Trail (CDNST) is within the project area. The area surrounding this trail must be managed to meet its nature and purposes, as stated in the Forest Service Manual:

‘Administer National Scenic and National Historic Trail corridors to be compatible with the nature and purposes of the corresponding trail.’

‘CDNST. The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor.

FSM 2353.42

“Manage the CDNST to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities.”

FSM 2353.44(b) (8)

The 2009 Continental Divide Trail Comprehensive Plan specifies USFS policy and direction for scenery and visual resource management along the trail.

That Plan states as policy that “The Forest Service will apply the Landscape Aesthetics – Scenery Management System to address visual resource management on National Forest System lands (Forest Service Manual 2380; Landscape Aesthetics: A Handbook for Scenery Management, Agricultural Handbook 701, 1995).”

CDNST Comp. Plan 2009 at 13 and FSM 2353.44(b) (7)

The Plan further requires that “The visual resource, as seen from the trail, must be considered... in specific project planning and design.”

CDNST Comp. Plan at 13.

Also:

“The one-half mile foreground viewed from either side of the CDNST travel route must be a primary consideration in delineating the boundary of a CDNST management area... The CDNST is a concern level 1 route..., with a scenic integrity objective of high or very high....”

FSM 2353.44(b) (7). See also USDA Forest Service, 2016 and CDNST Comp Plan at 13.

Scenic Integrity Objectives are defined as follows:

VERY HIGH (Unaltered) preservation

VERY HIGH scenic integrity refers to landscapes where the valued landscape character is intact with only minute if any deviations. The existing landscape character and sense of place is expressed at the highest possible level.

HIGH (Appears Unaltered) retention

HIGH scenic integrity refers to landscapes where the valued landscape character “appears” intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.”

(USDA, 1995)

Part of this scenic integrity direction is taken directly from USDA Forest Service, 2009, Management Policy and Direction, section B(4)(c)(1). This management direction is “to be used in the development of specific land and resource management prescriptions”. Id. at III E.

The Forest Service applied this direction in a “template for recommended forest plan components”. Two desired conditions therein state:

“The CDT is a well-defined trail that provides for high-quality, primitive hiking and horseback riding opportunities, and other compatible non-motorized trail activities, in a highly scenic setting along the

Continental Divide. The significant scenic, natural, historic and cultural resources along the trail's corridor are conserved. Where possible, the trail provides visitors with expansive views of the natural landscapes along the Divide. Viewsheds from the CDT have high scenic values. The foreground of the trail (up to 0.5 mile on either side) is naturally-appearing. The potential to view wildlife is high, and evidence of ecological processes such as fire, insects, and diseases exist."

USDA Forest Service, 2017, at 2.

A guideline therein states:

"To protect or enhance the scenic qualities of the CDT, management activities should be consistent with Scenic Integrity Objectives of High or Very High within the foreground of the trail (up to 0.5 mile either side)."

Id. At 3.

The 2002 White River National Forest Plan states as a guideline on page 2-35 that proposed activities should meet a scenic integrity objective of high in the foreground of the Continental Divide National Scenic Trail

The White River National Forest has no management area designated for its portion of the CDNST. That is no excuse for not applying the required protective measures for a congressionally designated National Scenic Trail.

All proposed vegetation treatments within one half mile of the CDNST that are visible from the trail must also meet a scenic integrity objective of high or very high. Significant portions of the proposed clearcut areas in treatment units 210, 211 and 212 should be managed as CDNST Treatment units, and not Hand Clearcut units, as those units are within one half mile of the CDNST and likely visible from segments of the CDNST.

It might be possible to clearcut vegetation within one half mile of the CDNST and retain high scenic integrity objectives, extra care and planning would be necessary to accomplish this.

Removal of trees in any clear cut areas adjacent to the trail remove vegetation normally viewed from the trail and expand the areas of land and vegetation visible from the trail.

Care must be taken so that cut tree stumps and/or cut trees are not visible from the CDNST, as these would detract from a naturally appearing landscape as viewed from the trail. Slash piles must not be located where they are visible from the trail. Prescribed burning of piles or vegetation should not occur where visible from the trail, as human set fires are not to be considered a natural ecological process.

Note that it is acceptable for evidence of ecological processes such as pine beetle killed or diseased trees to be visible from the CDNST

Properly reference the CDNST

The NOPA references the Colorado Trail, but that trail is not specifically identified on project proposal maps. The route of the Colorado Trail within the project area is actually coaligned and coincides with the

congressionally designated Continental Divide National Scenic Trail (CDNST). The federal designation of this National Scenic trail, and management direction for that trail, should supersede any other descriptions, names or management of other trails that are concurrent with the CDNST.

We thank you for your consideration of these comments.

Sincerely

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References

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