

September 25, 2023

Mr. Russ Bacon, Supervisor

Medicine Bow-Routt National Forests

% Brendan Kelly, Project Lead

925 Weiss Avenue

Steamboat Springs, Colorado 80487

Dear Supervisor Bacon,

I submit the following objection regarding the Draft Decision Notice and Finding of No Significant Impacts (FONSI) for the Mad Rabbit Trails Project. As acknowledged in my previous comment topics of importance to me have not been addressed to our satisfaction in the Final EA.

listed below, in addition to posing numerous questions.

- 1) **Elk Production Areas:** Recently remapped elk production areas are a major factor in the use and restrictions on public lands referenced in this EA.
 - a. Clarify the analytical framework and assumptions applied in the analysis of the effects to improve the transparency of findings around the CPW data used to redraw elk production zones between 2013 and this FONSI. I agree with DNR/CPW in regards to making public any and all available data as a part of the public record. CPW has resisted making their data around elk production zones public and has criticized USFS through Keep Routt Wild about cameras capturing elk on a production zone after the CPW defined June 15th. When the location of the camera is placed along with the date the calf elk were in a transition zone and not a production zone and the USFS closure on Buff Pass was appropriate. The currently proposed closures do not align with CPW production area dates and past documentation of calving beds studied in detail in the eagle vail area. It is not elk production areas that should be used to drive closures but the presence of elk calving beds.
 - b. Disregard biased data from local stakeholders and user groups used to define mapped elk production areas; A Keep Routt Wild Board member has been publicly boasting about helping redraw the maps to prevent trails.
- 2) **Rehab and elimination of trails prior to finishing ongoing studies:** Ongoing CPW studies around elk should be concluded prior to the rehab and elimination of proposed trails like MRP, Gunn Creek and Walton Rim. MRP, Gunn Creek and Walton Rim were the connections portion of the proposed trails and an important part of the proposal.
- 3) **Old HWY 40 Trail:** Old HWY 40 is shown to be an open trail in the current USFS plan in both text and in graphic form. There is no NEPA analysis showing it was closed and there are records


showing the USFS was not closing any trails based on the motorized planning process that was required nationwide. The EA does not evaluate the trails in the Ferndale area based on this trail being open. Please revise the analysis to show that trail as open and open it to the public for its use.

- 4) **Unauthorized Trail Construction from private lands:** Banning bikes off trail will do little to address one of the core issues this trails proposal was meant to address. The unauthorized construction of trails on USFS managed public lands. During the NEPA analysis of trails in the Steamboat Springs Trails Alliance proposal that was overwhelmingly supported by a public vote in 2013, USFS personal did not find any unknown trails developed by or for mountain bikes. The USFS did find a yet to be determined mileage of unauthorized trails from private land extending into the forest. USFS has ticketed some of these trail builders including a founder of Keep Routt Wild who was managing and residing at Conservation Lodge property at the time of the ticket for illegal trail construction. I didn't see anything in the EA that would address or even let the public know that this unauthorized trail construction was by anyone not using bikes. It was very clear what the trail system was built for that left the Conservation Lodge property in the Strawberry park area near the proposed Gunn Creek Trail. From the bullet holes in trees, the marks on trees where game cameras were clearly staged for a significant time, the ATV width tracks and log cuts, and the bones of big game animals, it is undeniable to think this was used for anything other than hunting or based on the photos of big game at salt licks on the private lands where the illegal trails originated a better term would be poaching in my opinion. USFS's lack of public acknowledgement of these facts has changed public opinion and skewed the comments it has received in relation to this Mad Rabbit trails project to anti-trail and specifically anti-mountain bike.
- 5) **Unauthorized Trail Construction from public lands:** These trails show a demand by the general public. While all the trails I know of were first used by horses and foot traffic as opposed to mountain bike specific trails
- 6) **Colorado Roadless Areas:** Trails are appropriate in Colorado Roadless areas and were not a part of the original discussion and analysis of designating the roadless areas because it was clear to the public that roadless areas were not preventing trails but roads, timber and linear construction zones. There is a lot of conversation around trails being a permanent fixture in Colorado roadless areas and the EZ clearly shows that trails can be rehabbed and are not permanent based on the plan to rehab many miles of trails in the project area. Not adding a properly planned and designed trail in a roadless area and especially a roadless area not the top tier is not what the Colorado roadless areas were meant to prevent. It is sad that some people and agencies are trying to expand roadless area restrictions without a through re-evaluation of the impacts of using the roadless rule to restrict trail construction in roadless areas.

It feels like the USFS has not been receptive to feedback and/or concerns from the authors of the Steamboat Springs Trails Alliance proposal. USFS personal used to sit down and discuss our concerns, but since Woodbridge has taken over, we have not been included or granted any meeting in person or over the phone and have tried several times to meet with our new USFS decision maker.

It is the above reasons that are my primary concerns and why I submit this objection. I would appreciate further discussion and clarification around the above issues that have all been noted to USFS in the past but have more recent and likely still emerging details as this project gets implemented and CPW finishes their local elk studies.

Sincerely,


Eric Meyer, Concerned citizen and co-author of the Steamboat Springs Trails Alliance 2A supported trails proposal.

CC:

Michael Woodbridge, Hahns Peak/Bears District Ranger, USFS