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March 28, 2024

re: Scoping on the proposed Eagle-Vail #2351 trail extension

The March 21, 2024 scoping notice asserts:

There is a need to address user-created trails in the project vicinity. There is currently a system of illegal trails made by members of the public, who are seeking recreational access from their homes to existing legal trails. This proposed connection will meet the current and future recreation needs of residents and visitors of Eagle County, and user created trails not utilized for the extension will be restored as part of this project.

The agency's proposal to create a new trail where selfish and irresponsible people have created a system of illegal trails will reward those individuals for bad behavior. It will encourage similar unlawful behavior in the future by individuals expecting the agency to eventually cave in and designate the illegal trails as lawful.

Creating a new trail is not the only way to deal with this problem, nor is it the most appropriate way. Other options that do not reward bad behavior include:

installing closure notices, fencing barriers, and terrain obstacles to prevent future use of the illegal trail system;

installing trail cameras to obtain photographic evidence of the individuals who continue using the unlawful trails despite the closure order;

increasing enforcement to prosecute those who engage in the unlawful conduct,

I am asking the USFS to implement these alternatives rather than rewarding the misconduct.

There are also concerns about the proposed location of the trail extension. I believe the National Forest lands immediate above the housing development are roadless and adjacent to the Holy Cross Wilderness. The Beaver Creek ski area has eliminated some of the roadless lands adjacent to this Wilderness, but there is a sizable patch between Minturn and Avon that appear to still be both roadless and contiguous with the Wilderness. These lands should be treated as roadless if they satisfy the agency's roadless inventory criteria, even if they have not been recognized in a prior roadless inventory ... or even if the USFS has removed them from the roadless inventory to facilitate future ski area development. If any roadless or potential Wilderness lands could be affected by the proposed project, an EIS should be prepared.

In addition, the scoping notice indicates the Forest Plan has designated the lands in question as Management Area 5.43 for emphasis on elk habitat. Creating a new trail through this MA appears contrary to the Forest Plan. At the very least, it would not be beneficial to elk or other species in the area and will, instead, result in more human disturbance.

Thank you for considering these comments.

DJ Duerr