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Organization: Roaring Fork Audubon

Title: Chair

Comments: February 22, 2022

Scott Fitzwilliams, Supervisor

White River National Forest

c/o Shelley Grail Braudis

Post Office Box 309

Carbondale, CO 81623

Re:Comments on USDA Forest Service Draft Environmental Assessment (DEA) for Redstone to McClure Pass Section of Carbondale to Crested Butte (CCB) Trail (Trail Project #56913)

Dear Supervisor Fitzwilliams,

The mission of Roaring Fork Audubon (RFA) is to speak for our wildlife that has no voice, especially our birds. With this important mission in mind, RFA and our more than 850 members support Alternative 1 - the No Action Alternative. Under the No Action Alternative, Pitkin County would not be issued a special use authorization (SUA) and would not construct the Redstone to McClure Pass Trail on the White River National Forest (WRNF). The No Action Alternative represents a continuation of existing conditions and current management actions. We humans in the Roaring Fork Watershed are slowly but surely chipping away at all the good habitat required by our native birds and other wildlife. We have paved, improved and developed habitat our birds require to survive, especially in the valley floors where the majority reside or use as part of their life cycle. Most of these birds are in decline; some are in steep decline. In the last 60 years, we have lost more than one-third of our birds. The single largest cause of this dramatic decrease is loss or alteration of habitat. Much of this is done in the name of recreation.

A common misconception is that, if a bird's habitat is impacted by trail development, the bird can just fly to an adjacent area to breed, roost and feed. This is not true. Suitable habitat is limited and is becoming more scarce as we honor recreation over conservation. Birds' territories in winter and especially in breeding season are heavily disputed and guarded; and, with habitat loss, this leaves many birds with nowhere to relocate and, often, no place to breed and survive.

If we don't vigorously guard prime habitat for all our birds, those in steep decline will not recover; and all others will continue to diminish.

Considering habitat loss due to human development or climate change, we firmly believe that the greatest threat to our waning bird populations is human indifference and lack of education.

RFA's goal is to raise awareness of our birds' plight and to provide education about the risk of losing what we do not protect. Our hope is that education will overcome indifference.

We have been conducting surveys along the Crystal River corridor, including the trail that winds its way up McClure's Pass, which is now rich in regrowth and abundant with native bird life, elk, bear, butterflies and small mammals. One photo is included. Regrettably, we do not have more at this time to show the impressive regeneration that has occurred. At present, most of it is a narrow, quiet trail that has little to no impact on the habitat with breeding birds in close proximity. Developing this narrow trail to accommodate bikers and hikers would cause immediate elimination of breeding habitat up to at least three feet on each side. Bike traffic would

affect at least another 50 meters on each side of the trail. This would cause an incalculable number of nests lost, thus another countless number of reproduction losses directly adding to the already sharp decline of our birds. There is much scientific evidence documenting that heavily used trails negatively affect bird nesting habitat.

As recreational development pressures mount, this short, narrow trail section becomes more important for the wildlife that call our valley home, especially for the birds that return to the same exact patch from as far away as Central America just to breed where they were successful before.

Our bird survey is included and was conducted with the Colorado Breeding Bird Atlas Survey protocol. The description of how the survey was conducted to avoid counting duplicate species is available on request. All species numbers represent singing males only and can be roughly doubled for species abundance. We also have a list of mammal and insect species observed.

This survey shows at least 45 species and is not complete. It was done to contribute to the Roaring Fork Watershed Initiative. We spent only one to two days per season in the area for three consecutive years. There are undeniably several more bird species present as year round residents, migrants and breeders that were not captured in one to two days per year of survey work. This same minimal survey revealed 23 species that are represented on at least one of the conservation organizations as noted on the attached survey spread sheet-- USFW's Birds of Concern, State of the Birds (The North American Bird Conservation Initiative (NABCI)) and Audubon's Species Most Vulnerable to Climate Change.

Although Coloradans may hold widely divergent standards about wildlife, the vast majority values animal welfare and wildlife conservation and protection. Most people also embrace a conservation ethic that prioritizes the ecological health of the entire community of life. Many do not realize the importance of protecting seemingly insignificant sections of habitat and how each piece of corridor is connected to the other. They may not know that promoting this type of development causes harm to wildlife. Ignoring that each invasion that triggers birds to lose breeding, roosting and feeding habitat sends a cumulative impact much like ripples in a pond, affecting all the species sharing this precious corridor.

Habitat preservation is what conservation organizations and environmentally trained government agencies must work on together to ensure that people realize their impacts have consequences. Roaring Fork Audubon has worked closely with the Forest Service on other projects and would enjoy collaborating with you on this.

Once people realize the importance of protecting our diminishing wildlife habitat, we believe they will support a trail that skirts the highway corridor rather than destroys existing habitat. The currently proposed trail up McClure's Pass will cause loss of wildlife and be one more place where quiet strolls to enjoy wildlife are not available to most citizens of our valley.

Sincerely,

Mary Harris

Mary Harris, Chair
Roaring Fork Audubon Society