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Organization:

Title:

Comments: See attachment

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Forest Service,

The following are general points of objection I have to the proposed Mad Rabbit Trails Project.

1-The trails have changed very little.

2-Most of the new trails are going to be built in the Long Park Road less Area.

3-Many of the proposed trails would be in elk calving areas.

4-Calving closures of snow of less than 12 inches as presented.

5- 49 miles of new non-motorized trails in Routt National Forest.

6-The EA violates multiple aspects of the National Environmental Policy Act.

7-The EA violates the Colorado Road less Rule(CRA).

8-The new trail segments overlap with sensitive elk production areas mapped by CPW as high priority habitat.

9-

The EA process itself because a [ldquo]more expansive environmental impact statement would reveal unforeseen possibilities for steering development away from areas of high biological and resources value, and avoiding conflict with other uses(DNR).[rdquo]

10-I have run trail crews for 18 years, partly for the Forest Service. I object to the Forest Service using an EA to reclaim illegal trails when that is part of their responsibility without the need for an EA.

See # 12.

11-There needs to be an EIS to evaluate the cumulative impacts in the entire project area that would require consideration of other alternatives.

12-I object to the Forest Service seeking to justify its decision by including the rehabilitation of illegal trails as an

offset/mitigation for the impacts of new Mad Rabbit trails.

13-The proposed actions would significantly alter the undeveloped character of a Colorado Road less Area and should require an EIS

14-Last year there was a historic winter kill of local ungulates who will be in more danger as they lose more habitat as result of the proposed recreational trail impacts in this area.

Detailed objections:

1- The Biological Evaluation states that parts or all of several trails would be in elk calving areas

2-In years when the snowpack lasted into calving season, there would be no closure while the snow lasted, and thus no protection for elk while calving was occurring. In early June in most years, snow is usually one foot or more deep.

3-If an area can't be closed during elk calving season, trails should not be built through it because calving is a critical time for elk.

4-The high trail density, greater than one mi/sq. mi, will create a high avoidance area for elk and in turn push elk further into the backcountry and deprive them summer range..

5-Most of the new trail development (48 miles) will be occurring in portions of elk production areas or summer concentration areas.

6-Trails 19, 20-22, and 30 will be open to human use during calving season.

7-The Biological Evaluation stated that flight distances elk will undertake in response to human bicycle use is about a mile. This is unneeded.

8- If an area can't be closed during elk calving season, trails should not be built through it because calving is a critical time for elk.

9-During years with late snow retention, trail use by bikes will create an area with declining elk populations. This is not acceptable.

10-Trails should be treated as roads. This would especially be the case if electric bikes are allowed. They are motor vehicles, and they may be worse for wildlife because they make less noise than other motor vehicles. The bikes will startle wildlife even more than jeeps, ATVs, etc. I see nothing in the project documents that specifically prohibits e-bikes. The EA needs to analyze the impacts of use of the proposed trails on habitat effectiveness.

13-The EA, Biological Evaluation and Biological Assessment does address the negative impacts to Canada lynx and does not takes those concerns into account. While lynx can tolerate some humans, they avoid such high-human use areas as proposed. I have seen several Lynx in the Mt Baker/Muddy Pass area in the past, but the compaction by snowmobiles has Foxes and Coyotes outcompeting the Lynx for snowshow hares. The Lynx are already impacted in the winter, the added bike trails simply compound the impacts year around.

14-The proposed project would mostly occur in the Long Park Colorado Road less Area (CRA) and create a high concentration of trails in the Ferndale. S. 40 corridor which would violate the Forest Plan guideline for semi-primitive recreation use.

15[mdash]The result of high use bike trails in a road less area will degrade soil, water, and air qualities

scenic quality, reduce diversity of plant and animal communities; impact habitats for threatened, endangered, proposed candidate, and sensitive species and primitive and semi-primitive non motorized classes of dispersed recreation.

16-The potential from forest fires due to climate change will also increase if this area is targeted for high density trails and recreational uses.

#### CHANGES TO THE EA:

1-This is such a big project that it needs an EIS to cover the extents of the impacts to wildlife.

2-Redraw the project so that no trails go through elk calving areas,

3-Trails open to bike use should be treated the same as motorized use in the calculation of habitat impacts and should be recalculated for habitat effectiveness values.

4-Survey the locations of the highest quality lynx habitat and ensure that trails do not go through this habitat nor fragment patches of good habitat by making travel between them difficult for lynx.

5-Make sure the trails can all be closed and will be closed during the calving season, to all human use, regardless of snow cover.

6-Because of climate changes impacting habitat and calving areas the poposal needs to provide more new habitat and less terrain for human uses.

Thank you for your consideration of these objections,