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First name: Aryeh

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Organization:

Title:

Comments: Mad Rabbit Trails Project

Attn: Objections

Russell Bacon, Reviewing Officer

USDA Forest Service,

Medicine Bow-Routt National Forests and Thunder Basin National Grassland

2468 Jackson Street Laramie, WY 82070-6535

CC: Brendan Kelly, Project Lead

Michael Woodbridge, District Ranger

Hahns Peak/Bears Ears Ranger District

925 Weiss Avenue

Steamboat Springs, Colorado 80487

To Supervisor Bacon, and all others it may concern.

While I am glad to see the result of FONSI to the latest Mad Rabbit NEPA, I object to a number of items that I previously commented on but that were not addressed in the latest analysis.

1. I do not believe that there is any evidence to support a seasonal closure of the Ferndale area. During the initial planning of this project, the Steamboat Springs Trails Alliance (SSTA) founders met numerous times in 2012 with local Colorado Department of Wildlife officers Jim Haskins and Daniel Dobson. They repeatedly stated that the Ferndale to West Summit area of Rabbit Ears Pass was the most appropriate area for a concentrated trail system in regards to wildlife and that there were no elk calving beds in the area north of highway 40. This area was of particular interest because of its southerly aspect and the opportunity for an early spring opening. CPW has provided no evidence or data to support a change to elk calving areas. Data that is not provided to the public for review should not be used in this analysis or in any decision making regarding calving areas of seasonal closures. The solution is to not have a seasonal closure until legitimate data is presented, and reviewed, to support such an action.

2. The Walton Rim Trail was a signature trail of the SSTA trails proposal and had massive public support. It would be a world-class trail for all user groups. It was never properly evaluated nor were satisfactory reasons given to justify its removal. So many trails have been removed from the original SSTA/2A trails proposal, that was massively approved by the voters, that we may not be meeting current trail needs, much less future ones. The Walton Rim trail should be considered for future development. One solution would be to shorten the trail alignment by moving the south end of the trail to the end of road 296 or to one of the northern points of proposed trail 21. Please reevaluate options for the Walton Rim Trail.

3. I do not agree with creating a restricted use area for one user group. This is discriminatory and shows a bias against a particular user group. Although cyclists are the least likely user group to leave the trail, creating a policy that discriminates against wheeled use but allows equestrians, hikers (with dogs), hunters and commercial cattle and/or sheep grazing, seems near sighted at best. Horses, cattle and sheep arguably do significantly more damage to landscapes than bicycles. The solution is to not implement a restricted use area and trust that the new area trails will be built well enough and with adequate progression as to attract the vast majority of cyclists, and other users, so that restrictions are not necessary.

4. There are many trails with historical use that are scheduled to be decommissioned. With a vastly growing population this is a nearsighted decision. Particularly trail 308, that is an old road bed, has historical hunting, equestrian, hiking and cycling use and is sustainable as is. As commercial grazing is allowed in this area, I believe that all user groups should have access to this historic trail, and any other historic trails in areas where commercial grazing is permitted.

Thank you for the continued opportunity to provide input to this project.

Sincerely,
Aryeh Copa
Signature attached