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Organization:
Title:
Comments: Comment Letter Attached

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USFS added letter text from attachment for coding purposes:

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Thank you for the opportunity to provide our National Environmental Policy Act (NEPA) scoping comments for the North Valley Trails (NVT) project.

We have found the Gunnison Ranger District[rsquo]s (GRD) NVT project and NEPA materials well organized and easy to use. We especially commend the Interdisciplinary Team (IDT) for its comprehensive consideration of a wide range of complicated factors.

Sincerely,

Robert Goettge

Kathy Norgard

Crested Butte South, CO

Critical Analyses to Perform in the Environmental Assessment (EA)

Reno Divide Road Parallel Motorized Trail Analyses

Safety Analyses

We have reviewed the process that is being followed by the Aspen-Sopris Ranger District (ASRD) - White River National Forest in its efforts to improve safety and reduce congestion problems on the Lead King Loop. We have read that one of the Aspen-Sopris Ranger District[rsquo]s first steps was [ldquo]engaging the Forest Service[rsquo]s Denver-based regional office to help out with a fresh study of safety conditions on the Lead King Loop.[rdquo] As a result, one of its next steps was development of a Road Safety Assessment for the Lead King Loop road

With the above as background, we believe it is essential for the Gunnison Ranger District to likewise produce a Road Safety Assessment for Reno Divide Road as a critical analysis to be performed in the NVT Environment Assessment (EA). Then Gunnison Ranger District (GRD) will know the current collision risks on Reno Divide Road.

Critically we believe it is essential that the NVT NEPA Environmental Assessment (EA) analyze improvements in

user collision risks and other safety metrics which would result from the Safety improvement actions suggested by the Road Safety Assessment. Each major improvement action, or group of actions, should be postulated as additional Reno Divide Road safety improvement actions and included in one or more additional GRD alternatives, including but not limited to the Preferred Alternative.

This will provide the EA with a full array of analyzed actions (including No Action) to compare with NVT[rsquo]s proposed Reno Divide Road Parallel trail action.

For comparison with the no action alternative (and other actions as described below) there needs to be analyses of the safety characteristics of the proposed Reno Divide Road Parallel trail. We believe it is absolutely essential that the GRD have the services of one or more experts in conflict-based safety analysis of mixed use motorized single-track trails. For these analyses the GRD must provide scenarios of use for the Parallel trail including use mixes, average and peak use volumes and other critical parameters. Overall safety characteristics for these analyses should be compared to the no action and other alternatives postulated as described above and published in appendices to the Draft Environmental Impact Statement (DEIS).

Purpose and Need Comments

The stated purpose for the Reno Divide Road Parallel Trail is:

[ldquo]Move non-motorized users off busy roads and onto trails to reduce potential vehicle collisions and congestion and to enhance user experiences[rdquo].

The IDT refinement states:

[ldquo]DOES THE TRAIL MEET THE PURPOSE AND NEED?

Yes. The IDT determined that this proposed trail would meet the Purpose and Need, because it would connect existing trails and move non-motorized users off a busy road reducing the potential for collisions and congestions while enhancing user experiences.[rdquo]

Comment 1: There is no stated [ldquo]Need[rdquo] identified by the Forest Service to move motorized users off busy roads. A non-motorized designation for the Reno Divide Road Parallel trail would continue to meet the stated need for moving non-motorized users off busy roads and onto trails. There is no stated [ldquo]need[rdquo] for this trail to be motorized in the NVT Projects stated Purpose and Need.

Comment 2: In the refinement, the IDT claims this trail would [ldquo]move non-motorized users off a busy road reducing the potential for collisions.[rdquo]

First, only a USFS Road Safety Assessment can determine what the potential for collisions is on Reno Divide Road. We believe that GRD transportation specialists could provide important perspective and expertise on the potential of collisions. The public would benefit from seeing the specialists[rsquo] conclusions as an addition to the Road Safety Assessment.

Second, the IDT has also not considered that the proposed new travel route could have greater potential for collisions than the road. (See comment 3 below)

Comment 3: The Reno Divide Road Parallel is proposed to be a motorized trail. The proposal would move non-motorized users (equestrian, hikers, and mountain bikers) off a Forest Service road to compete with e-bikes and motorcycles on a 2 foot wide, 3 mile long, single track with 1500[rsquo] vertical change. The Forest Service has not made a valid case for why the proposed motorized Reno Divide Road Parallel trail would [ldquo]reduce the

potential for collisions while enhancing the experience of non-motorized users.[rdquo] We know many hikers would rather be on a road than a busy motorcycle trail.

A comprehensive analysis of the safety of both the existing Reno Divide Road and the proposed Reno Divide Road Parallel trail must be conducted to decide between the new trail as a second, alternate route or keeping the existing road as the only route, possible with safety improvements.

Wildlife Analyses

Analyses identified by the IDT

In the Refinement of the Proposed Action document the IDT has identified (1) concerns related to wildlife and (2) Preliminary Wildlife Issues identified for Analysis. We believe each of these is very important. Analyses identified during scoping and associated assessments must provide critical evidence for decision making, even in cases when no significant impacts are identified from analyses.

As such we urge the Forest Service to address all identified concerns related to wildlife and perform all identified analyses listed in the Preliminary Wildlife [ldquo]Issues Identified for Analysis[rdquo] sections of IDT[rsquo]s REFINEMENT document.

Effects of Trail Use Frequency and Other Characteristics

One key metric for analysis of wildlife disturbance is trail density. Trail Density is described in detail on pages 224-225 of the DRAFT GMUG Forest Plan Revision DEIS Vol 1. As shown above, trail density is the primary metric suggested for use by the IDT to understand impacts to wildlife from recreation trails. We support the trail density analyses cited in the IDT Refinement. They represent an important step in wildlife management for Gunnison County.

However, trail density reveals only the potential for disturbance. It does not measure or predict the potential amount, extent, and severity of disturbance. Analyses of travel-based recreation[rsquo]s impact on wildlife must also consider the frequency, severity, geographic distribution of disturbances. The Forest Plan Revision, DEIS (Vol1, pp 224-225) describes these effects:

[ldquo]Depending on the mode of travel and frequency of use, big game species may be disturbed or displaced from using habitat adjacent to roads and trails when human use occurs.[rdquo] (p. 225);

And

[ldquo] . . . impacts to wildlife could include reduced wildlife security areas, reduced connectivity causing changes in species distribution and movement patterns, habitat impacts (new routes could add vectors for invasive plants), and species avoidance depending on frequency and timing of route use.[rdquo] (p. 224)

A full assessment of the amount of disturbance from a specific trail or trail configuration depends on (1) the size and geometry of trails, PLUS (2) the amount of actual and expected frequency of use. Trail density metrics address item (1), but by themselves do not include the effects of higher or lower trail usage rates. We suggest that NEPA analyses of NVT impacts on wildlife provide a reasonable coverage of the variables in the supporting assessment. The IDT has defined excellent coverage of item 1.

For item (2), the effects of frequency of trail use on wildlife disturbance, we suggest using recent research results from studies conducted in Gunnison County by wildlife (especially ungulate) ecologists based in Gunnison County. The results provide clear levels for estimating disturbance effects at different distances and at different

frequencies of trail use. The following are excerpts from the results.

[ldquo]With continual growth in recreational trail use, it is becoming increasingly complicated to balance demands for outdoor recreation opportunities with wildlife habitat conservation. To better understand how Rocky Mountain elk respond to trails, this project deployed remote cameras to determine ungulate usage responses with regards to various trail parameters.

[ldquo]Our cameras showed a higher likelihood of encountering elk as a function of increasing Euclidean distance to trails. An interaction between Euclidean distance and traffic volume showed elk respond negatively to increased traffic at closer distances to trails while higher recreation volumes corresponded with an increase in elk encounters at the farther distances.

[ldquo]With outdoor recreation increasing throughout the mountain west, our results underscore the need for strategic trail planning (i.e. reducing trail network sprawl) and the value of ample security habitat for elk.[rdquo]

We recommend analyses of NVT[rsquo]s wildlife disturbance impacts using the techniques described in the referenced study (and/or other science), and trail use volumes (for all type of trail users) in combination with trail density. The Forest Service should have available for these analyses both (1) actual recent observed of current values of trail use volumes and (2) estimated changes in use volumes following proposed NVT actions including additional parking. These use rates must cover ALL trails effected by the proposed NVT changes (trails and parking), not just the additional trails proposed. All connected trails, either directly connected to NVT trails or within a 20 mile trail distance should be included. The 20 mile limit may seem large, but NVT connects trails available for use by both motorcycles and e-bikes. Volumes should be available for the baseline (no NVT action) and for each proposed action for the cumulative effects. The analysis of cumulative effects should address the direct impact and the sum of current plus future NVT effects on trail use volumes.

The effects of NVT changes will be widespread. The recent Scoping comment from the Gunnison Wildlife Association (GWA) has particular relevance for analyses of effects on wildlife:

[ldquo]. . . we worry that the development of new trailhead (ed. Tent City) infrastructure and designation of additional parking space will have the unintended effect of attracting even more trail users than at present. This would result in a need for additional expansion in the future, thus creating a cycle of continuous incremental development of trails and associated infrastructure. All of this results in continued encroachment of human recreational impacts upon wildlife and their habitat.[rdquo]

We agree with GWA[rsquo]s point completely. We maintain that the indirect and cumulative effects of Tent City must be evaluated to accurately assess the environmental impact of the proposed NVT project on wildlife, especially big game. Please include analyses of these effects in the NVT EA.

Finally, different modes of backcountry recreation result in different amount of travel along trails. Thus, a typical mountain bike use will travel fewer miles than a typical motorcycle (or e-bike) use but more than a typical. Accurately forecasting wildlife from estimates of future use based on [ldquo]Forest Visits[rdquo] must differentiate among the types of visits.

In summary, NVT analyses of potential for impacts on wildlife will not be easy. Accurate analyses will depend upon accurate and complete data, well thought out assumptions, often complicated data analysis techniques. We suggest the Forest Service consider calling upon available qualified and unbiased volunteers in the North Valley to assist with these important tasks. One possible source of [ldquo]volunteers[rdquo] could be graduate degree students at Western Colorado University.

Travel Route Safety Analyses

Safety concerns have been identified by the proponent and the Forest Service for several travel routes. We believe that understanding and quantifying safety issues and devising solutions should be a critical and integral part of the NVT EA. We urge the GRD to carefully consider data collection and analyses techniques used for the Lead King Loop to produce data critical for valid assessment of NVT alternatives.

We believe it[rsquo]s important not to rush when evaluating road safety issues. We urge the Forest Service to obtain all data required for complete, expert evaluations of road safety issues and mitigation alternatives identified by the road safety studies, the NVT proposal, and Forest Service transportation experts. Please do not skip data collection and analysis steps identified by Forest Service engineers, even if these activities cause changes in NVT NEPA schedules. Similarly, please prioritize the importance and scheduling of formulating and evaluating alternatives that will mitigate any safety issues identified as critical.

Transportation Analyses

The proposal would increase parking capacity at two existing areas along Brush Creek Road at the Brush Creek Trailhead Parking Area and the Tent City Day User area. The proposal does not indicate expansion estimates in terms of number of vehicles parked. But even increases of a few hundred vehicles would lead to non-negligible increases of average daily traffic counts on lower Brush Creek Road at Skyland and non-negligible cumulative effects on average daily traffic congestion. While the effects on peak hour traffic counts at lower Brush Creek Road at Skyland may be modest, these modest increases in volume may lead to significant increases in congestion especially for left turning traffic from Brush Creek Road onto southbound Highway 135 and from southbound 135 onto Brush Creek Road.

We recommend as part of NEPA EA analyses that the Forest Service develop estimates of the increase in traffic caused by the two expanded parking areas on Brush Creek Road. (The Forest Service should submit a draft management plan with the DEIS for the new areas that includes, among other information, estimates of parking for autos, trailers, etc.) Then combine these estimates of traffic volume (from Gunnison County and/or Colorado Department of Transportation (CDOT)) not related to the increased parking. Finally, analyses should be performed by the Forest Service or others to produce the incremental and cumulative effects on traffic congestion resulting from the new/expanded NVT Brush Creek Road parking traffic. Because the effects can be highly nonlinear, the analyses should provide for a range of alternatives.

Upper Cement Creek Trail to Crystal

We request that the Forest Service (GRD or other division) conduct a Road Safety Assessment of the Upper Cement Creek Road to Crystal as one of the critical analyses of its NVT Environmental Assessment. Only with a professional scientific safety assessment can the Forest Service and the public support the Forest Service statement that [ldquo]The mixed use on the existing road the trail would parallel is not a safety concern this far up Cement Creek[rdquo].

Alternatives for consideration and analysis

The table below presents the alternatives of NVT actions we would like to see evaluated as part of the NVT EA. We have defined two alternatives, G-N X and G-N Y, shown between the No Action Alternative and the GRD[rsquo]s Preferred Alternative. One important note: for the Reno Divide Road action we expect that no matter which alternative finds approval in the NVT project, the GRD would continue with necessary repairs not requiring NEPA approval or even changes which would require another NEPA project.

For each of our alternatives we expect to see the results of each of the analyses defined above. We expect to see the same for the No Action Alternative, the preferred alternative, and any other alternatives that become part

of the NVT Environmental Assessment no matter from what sources.

TABLE (See Letter Submission): Table showing two Alternatives added by the authors and named Alternatives G-N Alt X and G-N Alt Y