

February 22, 2022

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Re: Comments on the Draft Environmental Assessment on the Redstone to McClure Trail

Scott & Shelly,

Thank you for hosting the WRNF Open House on the Redstone to McClure Trail. I found it to be very helpful in formulating this response. Of the posters presented, as well as your Draft Environmental Assessment (EA), I found the “Summary of effects” interesting, if not extremely disconcerting. As was made clear at the open house, this is not a referendum on the Crested Butte to Carbondale Trail, but rather only comments on the Draft EA.

At first blush the EA gives the impression that there will be minimal to negligible effects on the wildlife, if any at all. However, upon careful inspection, as well as discussions with some of the Forest Service employees in attendance, it became clearly apparent that there needs to be further studies on the potential impact of a bike and pedestrian trail in this area. In fact, in the Forest Service’s own words there could be “potential cumulative effects” of “unknown magnitude”! This finding alone should give the FS pause for concern and clearly warrants further studies in the form of an Environmental Impact Statement (EIS).

The idea of an off road bike trail down from McClure pass sounds like a great thing for those who enjoy off-road mountain biking, but what about the potential cumulative effects? It is easy to foresee that this trail will be extremely popular and will in all likelihood draw enthusiasts from all over Colorado , if not the world, as it becomes well known.

The Draft EA does not address the cumulative impacts of concern to me and an EIS clearly needs to be done for the following reasons:

- 1) Solely analyzing this portion of the trail from Redstone to McClure Pass is contrary to the Draft EA’s required cumulative impacts analysis of the entirety of the Carbondale to Crested Butte Trail (CCB trail);
- 2) The Draft EA fails to analyze a reasonable range of alternatives as required by NEPA;
- 3) The Proposed Action of the Redstone to McClure Pass trail is not consistent with the 2002 White River National Forest Plan required by the National Forest Management Act (NFMA);

- 4) This Draft EA seems to be justifying a predetermined outcome as is evident from the assessment previously done by Pitkin County hired expert and which has been copied almost verbatim by the USFS;
- 5) The USFS has not addressed the concerns voiced by retired longtime local Colorado DOW officer Kevin Wright. Kevin spoke specifically to the quality of habitat in the Bear Gulch and Old McClure areas and testified to the significant negative impacts to wildlife that trail development in those areas would pose;
- 6) The Draft EA does not analyze aquatic resources and fishes. Clearly, proposed trail construction, accompanying parking areas, and increased visitation by trail users will have significant and detrimental impacts to these resources;
- 7) The Forest Service has neither considered nor analyzed the reasonable range of alternatives in its Draft EA as legally required by NEPA;
- 8) The Draft EA neither includes an analysis of the projected use from the Redstone to McClure Pass trail, nor does it include the current recreation use in the area;
- 9) The Draft EA does not address ebike use or the potential for commercial bike companies to haul loads of customers to the top of McClure pass for a downhill ride;
- 10) The Draft EA neither thoroughly address the impact on elk, Canadian Lynx, Peregrine falcons, or bighorn sheep, nor is there mention of numerous other species certain to be impacted by trail development ;
- 11) The Draft EA does not address monitoring, enforcement, fines, adaptive management, habitat fragmentation and the cumulative impacts that are sure to result from the collective actions that will take place over time.

As written and investigated, it is the humble opinion of the undersigned that the proposed action not only violates the National Forest Management Act, it is not in harmony with the White River National Forest Plan. Accordingly, it would be arbitrary and capricious for the Forest Service to make a Finding Of No Significant Impact (FONSI) for this Proposed Action.

“If you build it they will come.” And come they most certainly will. And *when* the closures are disregarded (*not if*, as has been demonstrated time and time again) then the wildlife will have no choice but to leave, and one of the few remaining natural areas in our small and beautiful valley will be lost forever.

Respectfully and sincerely submitted,
s/ *Bill Argeros*
William G. Argeros