

Data Submitted (UTC 11): 2/22/2022 6:18:57 PM

First name: Suzy

Last name: Meredith-Orr

Organization:

Title:

Comments: February 20, 2022

To Whom It May Concern:

I write in opposition to the proposed Redstone to McClure Pass trail project.

The draft Environmental Assessment is primarily human-centric. Is it designed to benefit recreation and to address an heretofore unknown need for "trail connectivity." As the draft EA states on page 59, this will bring "substantial cumulative benefits to trail-based recreation" and would "increase the overall level of development" in the Crystal Valley.

The Crystal Valley is already a fragile place worthy of protection from the impacts of increased visitors and recreators. As this proposal points out, wildlife are already experiencing a decrease in habitat. The existing challenges to wildlife in the Crystal Valley should be addressed before considering any plans for increased human activity.

Increased use creates increased impacts on wildlife. The proposed natural surface trails are located in summer bighorn range as well as winter elk range. Some animals use the area year-round. We already see how expansion of human disturbance has disturbed elk populations and habitat, and how fire-suppression efforts and development have created poor winter habitat.

While the proposed winter closure may appear beneficial, its success depends on cooperation from users, some of whom may not agree with the need for such restrictions. Other winter closures in the valley aren't successful at enforcing restrictions on dogs. Given the financial limitations of the USFS, how will a winter closure be enforced?

Of secondary importance is the potential for conflicts between user groups beyond what currently occurs on the existing trails. The proposal will bring increased use to two fairly unknown, sleepy trails. It will transform what has been a tranquil hiking experience to one of tension as hikers will need to be on the lookout for bikes speeding around blind corners or over ridgelines. Hikers and equestrians could be displaced by the increase in mountain bike traffic.

While the paved section of trail proposed from Redstone to two miles south would provide a needed safe amenity for those living in that area, that trail could be implemented without proceeding with the off-road trail proposed between Hayes Creek and the top of McClure. Locating the trail within the highway ROW would avoid environmental impacts in the Bear Creek area and would also move road bike traffic off of 133, which has long been a safety concern for many residents of the valley.

Finally, of major concern is language in the EA that refers to the Carbondale/Crested Butte Trail as almost a done deal. Phrases like "a reasonably foreseeable action," "foreseeable projects," and "the Crystal River Trail segments north of Redstone would be implemented in phases between 2022 and 2040" indicate that plans are moving forward that would create additional impacts of environmental concern in the Crystal Valley and beyond. If the plan is, in fact, to connect two distant communities with bike trails, then the complete project should be addressed in one EA. Breaking a substantial proposal into tiny bites cannot reveal the full picture of how various ecosystems will be impacted and does not allow the public to have a complete picture on which to make informed comments.

Please withdraw this proposal and proceed with an environmental assessment that addresses the CCB trail in its

entirety. Wild areas are increasingly rare and long-term changes proposed for them must be backed by rigorous study of potential environmental impacts. Possible alternatives with less impact on wildlife may be available. There is no rush to push through this seven mile section now. Please reconsider, step back, and give us all the chance to see the big picture.

Sincerely,  
Suzy Meredith-Orr