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USDA Forest Service, Rocky Mountain Region

ATTN: Reviewing Officer

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Subject: Redstone to McClure Pass Trail Project Objection

To whom it may concern,

On behalf of the Crystal River Caucus, I am submitting the following objections regarding the Draft Decision Notice and Finding of No Significant Impact for the Redstone to McClure Pass Trail Project (DDN) released by the USDA Forest Service on January 23, 2023. The Crystal River Caucus submitted comments on the USFS Draft Environmental Assessment (DEA) on February 18, 2022, as well as a scoping comment letter dated March 16, 2020.

In both of those letters, the Caucus expressed concern about a potentially segmented approach to consideration of potential impacts associated with the entire Carbondale to Crested Butte (CCB) trail. The DDN makes it clear that we are indeed facing a segmented impact assessment, since the Redstone to McClure Pass trail is a relatively small segment of the CCB. Particularly concerning is the lack of consideration of impacts for the portion of the planned trail to the north of Redstone. While Pitkin County might not have made a final decision of the exact route, the details of Alternative A (along Highway 133 on the west bank of the Crystal River) and Alternative B (on the east side of the river on existing trails and roads) are well documented in the County's Trail Plan and acknowledged in the DEA. There is no doubt that this is a reasonably foreseeable future action, also acknowledged in the DEA (pp. 5 and 17), and in the Final Environmental Analysis (FEA, released January 2023) on p. 67.

Both Alternatives for the trail north of Redstone contain a number of anticipated impacts documented in the Caucus comments on the DEA, including removal of riparian vegetation, construction of new hardened structures to support the trail, and up to 14 bridges that could impact wetland, riparian, or stream function. These are all cumulative potential impacts and should be considered with the proposed trail between Redstone and McClure Pass. Approving the Redstone to McClure Pass segment without an analysis of the cumulative impacts of other segments violates CEQ regulations (40 CFR 1502.27(b)(7)). The Forest Service could issue a Programmatic EIS for the CCB trail and conduct environmental assessments for different segments of the trail and stay in compliance with NEPA.

The DDN states that "The Crystal River within the project area is eligible for Wild and Scenic River designation, as directed by the 2002 WRNF Forest Plan. The river within and adjacent to the project area is recognized to have recreational Outstandingly Remarkable Values (ORVs). The Proposed Action would benefit recreational ORVs in the project area." The DEA states clearly that because the 2002 WRNF Forest Plan (Forest Service, WRNF) designated the Crystal River corridor as eligible for Wild and Scenic Rivers Act (WSR) designation as a Recreational River, the Forest Service Plan directs that the Crystal River corridor within the CCB project area be "managed to protect and perpetuate" the Crystal River corridor in its current condition so that its recreation river qualities are not diminished." (Trail Project DEA p. 59). Given the potential impacts to aquatic resources of the Crystal River, confirmed in the County's approved December 2018 Final Trail Plan (pp. 49 - 53), as well as in

Appendix B of the Plan (the March 2018 Crystal River Section Environmental Review prepared by ERO Resources, pp. 19 - 23), the FEA's conclusion that the cumulative impacts of the reasonably foreseeable action of the County approved buildout of the CCB would result in "cumulative benefits" to the Crystal River's Forest Service-confirmed Outstandingly Remarkable Values (ORVs) (Trail Project FEA, p. 71) is not supported by the facts already in the record.

In its comment letter on the DEA as well as in its March 2020 scoping letter, the Crystal River Caucus expressed its concern about the potential for project impacts to wildlife and highlighted two areas that have already been identified as sensitive wildlife habitat: Bear Creek and McClure Pass (the old wagon road). The Caucus also expressed its concern for cumulative impacts from the full CCB buildout, including the potential for increased use to increase already existing disturbance and habitat fragmentation for certain identified species by expanding the network of interconnected trails.

From 2018 to 2021, Pitkin County OST placed trail cameras along the Rock Creek Wagon Road (Bear Creek) and the Old McClure Pass Road (FEA pp 45 - 47). Based on the data gathered by the trail cameras, the average number of passes per day along the Rock Creek Wagon Road was 3.4 hikers or runners, 1.5 dogs, and 0.02 bikers, and for the Old McClure Pass Road 3.3 passes per day by hikers or runners, 1.8 dogs, and 0.2 bikers. Since many of the people using these trails are on an out-and-back trip, a single person or dog is likely counted twice (FEA, p. 46). With a developed trail and additional public parking, many more people are going to be drawn to the area. The caucus is skeptical that wildlife impacts would be insignificant and believes that a Draft Environmental Impact Statement must be prepared for the project that fully evaluates all potential direct, indirect, and cumulative impacts not only from the Proposed Redstone to McClure Trail project, but also from the entire, approved CCB Trail Project.

A piecemeal approach to any recreational trail in the Crystal River Valley will cause irreparable harm in our valley that will only grow worse over time. The forest service should be using a holistic approach that considers a recreational plan for the entire valley. An EIS should be a fundamental requirement before any future development is proposed, especially for bike trails that almost universally will result in "bandit trails" through the forest. All other reasonable alternatives should be studied and undertaken before constructing a trail through one of the last places in the valley that is a refuge for so many animals.

Thank you for your consideration of these comments.

Sincerely

John Emerick
Chair, Crystal River Caucus