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Comments: The 1998 Forest Plan that anchors much of the planning for the Mad Rabbit Trails Project is woefully out of date. The National Forest Management Act states that a Forest Plan must be revised every 15 years. A 25 year old plan cannot be used as a substitute for an EIS.

Many of the trails are proposed to be located in Colorado Roadless Areas. The Colorado Roadless rule states, "Proposed actions that would significantly alter the undeveloped character of a Colorado Roadless Area require an Environmental Impact Statement (EIS)." Though brought to the Forest Service's attention, there is nothing written in the entire EA about this requirement. The massive numbers of tourists this project is planned to attract will clearly alter the undeveloped character of the Long Park Roadless Area.

The Forest Service proposes to close and rehabilitate 36 miles of illegally created trails to attempt to compensate for impacts associated with the new trail building. This is inappropriate for several reasons. First, the Forest Service has allowed unsanctioned trails to persist on forest lands in derogation of its administrative duties. This could have been easily authorized with a Decision Memo. An EA is not needed. Stepping up to do its job now should not be credited as "mitigation" for yet additional impacts of new trails construction. Second, it is arbitrary to make an equivalence between the closing of undocumented trails with rare usage on one hand, and trails proposed for high-volume tourism on the other. This is not backed up by any research included in the EA; human disturbance to wildlife is dependent on the frequency and type of activity, not purely the length of a trail. The Forest Service has not performed any traffic analysis on either the trails proposed to be decommissioned, or on the newly proposed trails. Third, using the removal of illegally created trails as a mitigation allowing for new trails to be built creates perverse incentives for the unauthorized trail builders.

The Forest Service claims that the impacts from Mad Rabbit are minimized because a majority of trails are located within 1 mile of an open road. They claim this is recommended by two research papers, Wisdom 2018 and Wisdom and Johnson 2019. Neither paper discusses the topic. Additionally, even if the papers did recommend such a placement, "open roads" in those papers refers to unpaved Forest Service roads open to the public, not paved roads. Paved roads and even interstate highways have been shown to have a smaller disturbance distance to elk, deer, and other ungulates than recreational trails. The research behind this can be read [here](#).

The Mad Rabbit EA states that the Colorado Guide for Building Trails With Wildlife in Mind is one of the key documents guiding their planning and evaluation. However, they did not come close to following that guide. The Guide has a theme of Avoid, Minimize, and Mitigate. They did not avoid placing trails in elk calving areas, though they could have by placing trails to the south of US40. They did not minimize the impacts of trails that are in those areas. Over 14 miles of trails cross elk calving areas without the recommended seasonal closure from May 15 to June 30. Even those that do have a seasonal closure are contingent on snow levels being 12 inches or less. There is no documentation on how this is derived or measured. This modest snow level does not deter a cow elk seeking a place to give birth. Mitigation is not even proposed, but would consist of a financial transfer to CPW for habitat improvement elsewhere.

There are no maintenance or enforcement plans associated with Mad Rabbit.

The project is part of an overall trails proposal explicitly designed to attract 180,000 incremental summer visitors to the Steamboat area, each staying on average over 4 nights. Prorating for the portion of the project represented by the Mad Rabbit Trails Project adds over 1700 summer visitors per day, impacting local housing and increasing the density of users on the entire trail network. The Forest Service did no planning or estimation of the impacts of

this number of visitors.

The Colorado Roadless Rule is clear: "Proposed actions that would significantly alter the undeveloped character of a Colorado Roadless Area require an Environmental Impact Statement (EIS)." Yet, despite the explicitly stated purpose of attracting a huge number of tourists, no EIS is planned.

Additionally, Roadless Areas are designed for primitive or semi-primitive recreation. This is defined as meeting a maximum of 15 other parties over a day. The traffic on these trails will far exceed this metric.

The Final EA minimizes the impact to elk. It does not mention that the local E2 Bears Ears elk herd has suffered dramatically this past winter. CPW has stated, "The Severe Winter Zone is an area known for some of the largest elk herds in the nation, and severe winter conditions have resulted in high elk calf and above-average cow mortality. Survival rates are the lowest CPW has ever documented and below what CPW previously thought possible in elk."

The Forest Service used an obsolete habitat effectiveness model from 1983 to measure elk habitat effectiveness that doesn't include impact from trails, just roads. They state in the EA, "There is no change in habitat effectiveness from the no action related to the Mad Rabbit proposal. Trails are not part of the calculation for habitat effectiveness." They used an old model that doesn't consider impact from trails to evaluate a project consisting nearly completely of trails.