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Comments: In my objection to the currently proposed USFS Mad Rabbit project I am highlighting important points from the DNR and CPW November 23, 2022 letter regarding this project.

I object to the USFS proposed Mad Rabbit Project for the following reasons:

The proposed trails overlap with sensitive elk production areas (high priority habitat) as mapped by CPW. Most of the new trails are within the boundary of a designated Colorado Roadless Area (CRA). Completion of this project as proposed would set a dangerous precedent, as it would be the first project with this density and negative environmental impact in a Roadless Area and within high priority/sensitive elk habitat. Given the accelerating effects of climate disruption, it is vital that the USFS start taking greater care to avoid negative impacts to large swaths of previously protected and undeveloped areas. The extreme climate disruption that we can expect in coming decades will lessen optimum wildlife habitat. The location of most of the proposed trails will accelerate that impact.

Although Highway 40 does run through the proposed Mad Rabbit area, the Long Park Roadless Area and the Ferndale area are not currently heavily impacted by human activity. That will change if this proposal goes forward. There are areas of Rabbit Ears Pass that are already impacted where this type of trail density would not have such a great an impact. Currently recommended best practices are to to avoid development in previously unimpacted areas, and to concentrate this kind of development in already impacted areas. The plan which is in process through the Routt Recreation Roundtable, made up of stakeholders from throughout Routt County, will support the policy of concentrating this kind of development in already developed areas. For these reasons and others, this proposal is not "sustainable recreation".

While there may not be any provision excluding trails within Roadless Areas, trail development of this density and type definitely does not fit the description of semi-primitive or primitive. The number of trips on these trails will cause wildlife to move out of them and eliminate the semi-primitive and primitive nature of these areas.

I question the validity of proposing "mitigation" as a solution to the impacts on wildlife that will result from this MR project. If wildlife is pushed out of this area, it will likely simply be forced into less desirable areas, just as wildlife has been and continues to be pushed out of high priority habitat due to human encroachment. There are many reasons why wildlife congregate in these areas and not in others.

I object to the fact that the MBRNF has not adequately studied the impacts of the MR proposal on a level that is both detailed enough, comprehensive enough, or current enough as described in the DNR/CPW letter. Considering all the likely impacts of this project, as the DNR/CPW letter asserts "...there is also a strong case to be made for pursuing a more holistic, landscape-level environmental analysis to take stock of the outdoor recreation outlook in the wider Routt National Forest." The Medicine Bow - Routt National Forest needs to stop making piecemeal decisions such as the Mad Rabbit project until it has looked at the cumulative impacts it will have on the broader forest health. Also quoting the DNR/CPW letter, "...implementation-level planning tools such as the current environmental assessment impose arbitrary limitations on analyses, and are tethered to previous decisions that sometimes distort the accuracy of findings. With respect to the current process, we have flagged our concern that the Terrestrial Evaluation is restricted to applying outdated methodologies for assessing habitat effectiveness and other indicators that were approved in the 1998 Forest Plan, even though more accurate recent models are presented." There are too many unanswered questions about potential negative impacts to proceed with this project. It demands that an Environmental Impact Statement be completed before proceeding.

Due to long-term shortages of personnel, the Medicine Bow- Routt NF does not have the staff to adequately monitor, manage, and enforce activity on the proposed trails in the Long Park Roadless Areas and the Ferndale downhill mountain bike park. There is no reason to expect, given past history, current practice, and these existing personnel shortages, that the MBRNF will be able to prevent abuses in these areas with adequate monitoring or enforcement.

The Ferndale development will be directly off of the heavily traveled Highway 40, which will certainly result in very high use due to ease of access and frequency of travel. There will be slowing and turning automobiles going up and coming down the highway, which is posted at speeds of more than 50 miles per hour. What is the level of threat to public safety from a heavily used bike park being accessed from the steep incline on this heavily used highway? For these reasons the Ferndale trailhead location is very problematic.

There are far too many concerns, conflicts, and questions about the Mad Rabbit Projects' potential harm to the Long Park Roadless Area and the High Priority Habitat for elk and other wildlife, for this project to proceed. At the very least, an Environmental Impact Statement and more thorough and comprehensive research needs to be completed to address potential shortcomings and problems before the Mad Rabbit Project can proceed.