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Organization:

Title:

Comments:

To: Forest Supervisor Russ Bacon

Re: Mad Rabbit Trails Project, objection comments

Sept 23, 2023

Dear Forest Supervisor Bacon,

We submitted comments in the comment period of the Mad Rabbit Draft EA. We are therefore qualified to submit objection comments, and these are related to our initial concerns.

We have significant issues regarding the Mad Rabbit Trail System EA findings. We object to the FONSI (Finding of No Significant Impact.) We believe that finding should be retracted and an EIS performed across the project area.

The central purpose of creating Mad Rabbit was to bring tens of thousands of visitors to the area, as stated in the SSTA (Steamboat Springs Trail Alliance proposal), of which Mad Rabbit is one part. Prorating the visitor projections from that proposal leads to approximately 1700 incremental visitors daily using 42 miles of trails. There was no analysis of the number of daily trail users on the proposed trails in the Final EA (FEA). Without a trail traffic analysis, the USFS cannot determine whether the proposed project poses significant impacts on our wildlife and the environment. Without this evaluation there can be no determination on whether the traffic meets the criteria for semi-primitive recommendation as specified in the Colorado Roadless Rule. Such recreation is limited to a maximum of 15 encounters with other parties per day. This is a key aspect where the evaluation is insufficient.

Furthermore, a GIS (Geographic Information System) analysis that Rocky Mountain Wild and Keep Routt Wild performed finds a 3900-acre loss of habitat, and the location of more than 14 miles of trails in elk production areas without seasonal closures. Both create significant impacts. We strongly object to the creation of new trails without appropriate seasonal closures and additional and adequate enforcement. The FEA stated there is no change in elk habitat impact related to the Mad Rabbit proposal, but trails were not part of their calculations. The USFS used an inappropriate model for evaluating habitat impact for a project whose primary purpose in the construction and use of new trails. The FONSI should be withdrawn, and an EIS performed using models that take into account the impact of trails.

Trails in the Long Park Roadless Areas, and in elk calving areas continue to be a major concern. Trails need to be designed to be compatible with the undeveloped characteristics of any Colorado Roadless Areas. All trails should be designed with Colorado's Guide to Building Trails with Wildlife in Mind. The Mad Rabbit proposal violates numerous aspects of this guide. The Guide has a theme of Avoid, Minimize, and Mitigate. The Mad Rabbit proposal does not avoid placing trails in elk calving areas. It did not minimize impacts by instituting seasonal closures for all trails when it created trails in elk production areas.

We believe the current Mad Rabbit proposal also violates the numerous NEPA and Colorado Roadless Area procedures. 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." Though we

brought this specific issue to the USFS' attention in our previous comments, the Final EA does not mention nor evaluate this criterion. The large number of daily tourists expected to use these trails will clearly alter the undeveloped character of the Long Park Roadless Area, yet the FEA has no mention of this issue. Therefore, the Final EA is insufficient, the FONSI should be withdrawn, and a proper EIS needs to be performed.

We are aware that Mad Rabbit is the second phase of a more comprehensive trail network, described in the SSTA proposal. The Buffalo Pass Trails Project was phase 1, and Mad Rabbit is Phase 2. This is well known, reported in the press, and published in USFS Newsletters distributed to members of the Routt Recreation Roundtable during Mad Rabbit discussions. Yet, the USFS has chosen to evaluate both projects separately and independently with their own EA, violating NEPA processes. These are connected actions and must be evaluated together in a single NEPA process.

The USFS is relying on an out-of-date 1998 Forest Plan, which is another reason an EIS should be used to analyze these areas. This is well beyond statutory requirements that Forest Plans be updated at least every 15 years, making it invalid to justify a FONSI. According to District Ranger Michael Woodbridge, at the EA presentation meeting at CMC on Oct. 27, 2022, the planning process to update the Forest Plan will not be started until 2024 and will likely take at least 3 years from that starting point to complete. Major projects should not be started until the Forest Plan is updated, or an EIS is performed for this area.

We have lived in Steamboat since 1982, and in our home near Elk Park Trail for 37 years. We hike, ride our horses, and backcountry ski primarily in the Rabbit Ears and Buffalo Pass areas, so we know these areas well. Marilyn is on the Routt Recreation and Conservation Roundtable, as the Equestrian representative, and has participated in the Mad Rabbit discussions since 2018. We have been actively involved throughout the Mad Rabbit process, so this is not an issue that is new to us.

Due to all of these issues, we respectfully request that the FONSI be withdrawn, a decision of No Action be made, and a comprehensive EIS be performed over the project area that includes Mad Rabbit, previous actions, and reasonably foreseeable future actions.

Sincerely,

Mark and Marilyn McCaulley