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Comments: I am writing in objection to the USFS Draft Decision Notice and Finding of No Significant Impacts (FONSI) re the Mad Rabbit Trails Project. I submitted comments during the Draft EA Comment Period in November, 2022 and have listed those comments below for reference.

My objection to the USFS Draft Decision and FONSI is not because I simply don't like the outcome. Rather, it is clear that none of the comments I made during the Draft EA Comment Period (pasted below) were addressed. Accordingly, the USFS should retract the FONSI, select a decision of No Action and move forward with an EIS.

Thank you for your consideration.

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November 2022 Draft EA Comments:

I am writing in opposition to the draft Mad Rabbit Trails Project proposal, dated October 24, 2022.

I believe that developing the project as described would be detrimental to local wildlife and their habitat. This project is proposed in the habitat of the E-2 Bear's Ear elk herd, the second largest elk herd in Colorado-the second largest in the world. The proposal represents substantial threats to this elk herd (and other wildlife), as well as the Long Park Roadless Area. I believe the USFS has failed to consider the cumulative impacts that the Mad Rabbit Trails Project will have on elk, other wildlife and their habitat, particularly in the wake of other recently completed trails projects in the area (Buffalo Pass Trails Project, for example). Furthermore, it is my understanding that the USFS is relying on an outdated Forest Plan (dated 1998) to consider cumulative effects on wildlife/habitat. With this in mind, the Mad Rabbit Trails Project deserves an EIS (Environmental Impact Statement) if the cumulative effects of this proposed project are to be appropriately identified.

Additionally, there are several other aspects of the Mad Rabbit Trails Project that the USFS should consider:

-The USFS has not extensively evaluated less impactful alternatives, including placing trails on other already developed public lands or moving the trails outside of species calving areas and summer range, or to the south of US 40. All of these alternatives were brought to the USFS's attention. Not considering these alternatives further is counter to Colorado's "Planning Trails with Wildlife in Mind." Also counter to Colorado's "Planning Trails with Wildlife in Mind" is the dense set of proposed trails near US40 in the area known as Ferndale. This portion of the project results in over 3 linear miles of trails per square mile of elk habitat, violating the 1 linear mile of trail per square mile of habitat metric specified in Colorado's "Planning Trails with Wildlife in Mind." And, yet another blatant violation of Colorado's "Planning Trails with Wildlife in Mind" exists in the project's failure to place seasonal closures on proposed trails in elk calving areas. There are 21 miles of proposed Mad Rabbit trails in acknowledged elk calving areas that will have no seasonal closures at all. Peer reviewed research has shown a 5% probability of mortality of an elk calf each time it is disturbed, which can occur as far as 1500 meters away from mountain biking activity.

-The USFS has not performed any traffic analysis on either the illegal trails proposed to be decommissioned, or on the newly proposed trails. The mechanism proposed in the project-the removal of illegally created trails as a mitigation allowing for new trails to be built-creates very problematic incentives for unauthorized trail builders (now and in the future).

-The previous development of the nearby Buffalo Pass Trails Project has led to elk abandoning nearby areas, effectively leading to habitat loss for the E2 herd. This is reflected in the observed population and recruitment

decline of the GMU14 resident elk herd. I have personally observed a dramatic decline of elk numbers in the area following the Buffalo Pass Trails Project.

-The Mad Rabbit Trails Project is supported by a 1998 Forest Plan, which utilizes an obsolete 1983 Elk Habitat Effectiveness model. This model is clearly an outdated tool-one that even excludes any impacts from recreational trails! Modern models rely on spatial analyses that the USFS has refused to perform, though using the most up-to-date science is required in NEPA guidance.

The Mad Rabbit Trails Project poses enormous and irreversible risks to wildlife and their habitat. The USFS should prepare an Environmental Impact Statement that includes the entire region from Mount Zirkel Wilderness to Sarvis Creek Wilderness areas to qualify the cumulative impacts of all recent projects in the region. This would include the previously constructed trails in the Buffalo Pass area, recent ski area expansion, and proposed road improvement projects.

If the USFS is unwilling to proceed as such, the project should not move forward.