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Organization: Northwest Colorado Chapter, Great Old Broads for Wilderness
Title: Co-Leader
Comments: We are writing to object to the Mad Rabbit Trails Proposal and to request that the Forest Service retract the FONSI for this project and commence a full Environmental Impact Statement (EIS).
An EIS is required for any project that would "significantly alter the undeveloped character" of a Colorado Roadless Area. Although we brought this concern to you in the letter we signed and submitted in November 2022, the Forest Service has not addressed this issue anywhere in the final EA.
The project still proposes trails in elk calving areas without requiring adequate seasonal closures. "Mitigation" in the form of financial payments to CPW for habitat improvement will not do anything to protect the affected elk herd. Similarly, closing existing illegal trails is in no way a substitute for building new trails in sensitive wildlife habitat.
Again, we respectfully request that you retract the current EA and begin a full EIS.