

Data Submitted (UTC 11): 4/14/2024 4:56:31 PM

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Comments: I am writing as a member of the Eagle County Community Wildlife Roundtable, as well as an employee of Backcountry Hunters & Anglers to provide public comment on the proposed adoption of a social trail in Eagle/Vail that connects to a larger trail system. After reviewing the project details and its potential impacts, I am concerned about the trail's location in severe elk winter range and its proximity to production areas. These are sensitive habitats for elk, and any disturbances in these areas can have significant negative consequences for the wildlife and ecosystem.

There are very few remaining refuges for elk and mule deer during the times in which they are most vulnerable. According to CPW the E-16 herd is at a calf:cow ratio of 36:100. CPW staff has warned that ratios below 45:100 are unsustainable with a very low chance of rebounding. It is of the utmost importance that we maintain habitat connectivity and integrity in these critical areas.

While I recognize that this proposal is a lesser of two evils project, it is the obligation of the USFS and surrounding land managers to enforce and manage illegal trail creation and use. Formalizing the adoption of social trails can set a troubling precedent, suggesting that creating unauthorized trails may lead to formal adoption over time, bypassing standard procedure. This approach undermines the integrity of our trail systems and could encourage further unauthorized trail construction. Considering the location of this trail I highly doubt its construction would pass a comprehensive NEPA assessment. Instead, I urge the USFS to strictly enforce regulations regarding unauthorized trails.

If the adoption of the social trail moves forward, I strongly recommend a no net habitat loss policy at the very least. This policy would involve the decommissioning of another trail that fragments critical habitat. By balancing trail adoption with habitat restoration, the USFS can help mitigate potential negative impacts on wildlife. An example of a social trail to reclaim is the A-10 trail, a 17-mile loop that significantly fragments elk and mule deer habitat.

While the proposed trail may be justified due to its proximity to a housing development, it is essential for our mountain community to recognize that all residents should not expect nor do they need direct trail access from their backdoor. There is an abundance of existing trails available, and prioritizing habitat protection over backyard access is crucial. Should this project be approved, the trail should be built as close to the housing development as possible to minimize disruption to wildlife with appropriate seasonal closure applied and enforced.

In conclusion, I urge the USFS to carefully consider the long-term impacts of this project on wildlife and habitat. Additionally, being more critical and strategic at a landscape scale across land ownership as far as how and where recreation is provided and how it interfaces with wildlife and habitat. I believe it is in the best interest of the agency and its stakeholders to adhere to the principles of no net habitat loss and conserving critical habitat for big game.

Thank you for considering my comments. I hope the USFS prioritizes the health of the ecosystem and wildlife in its decision-making process.

Sincerely,

Brittany parker