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March 12, 2020

Scott Fitzwilliams

c/o Shelley Grail Braudis

PO Box 309

Carbondale, CO 81623

Re: U.S. Forest Service NEPA Review of the Redstone to McClure Pass Trail Segment of the Carbondale to Crested Butte Trail proposed by Pitkin County - Supplemental Comments

Dear Mr. Fitzwilliams,

I am writing as a concerned citizen of Pitkin County and resident of the Crystal River Valley in order to supplement my January 17, 2020 comment letter with respect to the environmental review that the Forest Service has initiated, pursuant to its obligations under NEPA and associated regulations, of the Redstone to McClure Pass Trail Segment of Pitkin County's planned Carbondale to Crested Butte Trail.

In my January 17, 2020 comment letter, I respectfully urged the Forest Service to evaluate the potential environmental impacts of Pitkin County's entire trail plan, including all proposed alternatives, approved by the County Commissioners in December 2018 (<https://www.pitkinostprojects.com/carbondale-to-crested-butte-trail-plan.html>), as connected and reasonably foreseeable future actions related to the County's planned construction of the entire Carbondale to Crested Butte Trail, not just those associated with the Redstone to McClure trail segment. I emphasized my particular concern with the potential for significant cumulative impacts to the Crystal River and its associated riparian areas resulting from the trail and related bridge construction along much of its length up the Crystal River Valley.

Through this supplemental letter, I am submitting evidence to the Forest Service of the potential for impacts to riparian and aquatic resources that have already been identified both by Pitkin County and its own consultants, ERO Resources, in the County's December 2018 Carbondale to Crested Butte Trail Plan ("Final Trail Plan"), and by an independent stream and riparian scientist, Mark Beardsley. Copies of their reports are attached to this comment letter. Their findings are summarized below.

There is substantial evidence of the potential for the Pitkin County approved trail plan, including all of the alternative alignments that it contains, to have considerable negative impacts on the long term health of the Crystal River. Both Open Space Staff and independent consultants have confirmed, in the documents described below and attached hereto, that construction of the Trail, based on the Trail alternatives considered in the approved Plan, including the Recommended Alignments, has the potential to cause significant aquatic and riparian impacts.

1. In a September 28, 2017 letter from the Pitkin County Healthy Rivers and Streams Board (River Board) to OST staff (attached), the River Board requested that Open Space and Trails provide information about likely aquatic and riparian impacts. Potential trail impacts that concerned the River Board included:

- \*Potential to cause bank hardening;

- \*Anticipated total acres of native riparian and upland plant habitat disturbed by construction;

- \*Potential for increased channelization of the Crystal River;

- \*Identification of probable sedimentation and drainage locations, materials suspended, and volumes;
- \*Potential impacts to wetlands;
- \*Identification of any trail segments with in-river construction, as well as any proposed management plan to mitigate anticipated short and long term impacts of any of the above riverine topics.

2. In its response to the River Board (attached), OST summarized potential impacts to aquatic resources by Alignment Alternatives (Alignment A - the "Highway" Alignment, on the east/ river side of Highway 133 along the bank of the Crystal River, and Alignment B - on the east side of the Crystal River, following existing trails and roads). These potential impacts are confirmed in the County's approved December 2018 Final Trail Plan (pp. 49 - 53), as well as in Appendix B of the Plan, the March 2018 Crystal River Section Environmental Review prepared by ERO Resources, pp. 19 - 23. (Note that the County does not address impacts to water resources in its own section of the Environmental Review of the Trail, but rather under a section titled "Vegetation Resources."). Language below quoted from pp. 19, 21-23 of Appendix B of the Final Trail Plan (emphasis added):

"New impacts to stream habitat resulting from the trail alternatives could result from the following:

- \* Installation of additional narrow bridges, which would further constrict the floodplain
- \* Installation of piers, retaining walls, riprap or other hardened structures along or within the streambed, which would further constrict stream morphology and function and result in increased channelization
- \* Removal or fragmentation of high-quality floodplain riparian habitats due to trail construction and hardening
- \* Further dissection of floodplain connections due to new construction"

"Summary of Instream and Riparian Impacts

The impacts of each alternative (if implemented over the entire length of the study area) on instream and riparian habitats along the Crystal River are summarized below.

#### Alternative A

Alternative A follows the existing alignment of SH 133 for its entire length. During the field review, limited native vegetation was observed in the highway right-of-way. Anticipated impacts from Alternative A include the following:

- \*Existing riparian vegetation would likely be removed to make way for the trail bench, with little opportunity for revegetation and mitigation.
- \*Assuming a narrow trail disturbance width of up to 15 feet from centerline, the trail would disturb up to about 75 acres of vegetation throughout the corridor, most of which would be adjacent to the Crystal River.
- \*Challenging trail design solutions along the narrow strip between the highway and the streambank would require about 11,300 feet (2.1 miles) of new riprap, walls, piers, or other hardened structures.
- \*New hardened structures would further incise and degrade stream function in affected areas.
- \*New construction and excavation along the Crystal River streambank, and in some cases within the channel, would increase erosion and sedimentation and the potential for impacts to water quality and in-stream habitat. While these impacts would be reduced by construction timing, best management practices (BMPs) and engineered solutions, the location and extent of this impact would elevate the risk of impacts.

#### Alternative B

Assuming that a 25-foot area would be the limits of disturbance from the center of the trail, about 50 acres of ground disturbance would occur from construction. This would be an over-estimation for either trail alternative, as both segments follow existing trails and roads for almost their entirety. Anticipated impacts from Alternative A include the following:

- \*Several small areas of wetland and riparian vegetation would be disturbed during construction.
- \*A larger extent of wetland and riparian vegetation in the Janeway North area (about 0.35 acre) would be impacted.

\*Assuming a wider trail disturbance of up to 25 feet from centerline, the trail would disturb up to about 120 acres of vegetation throughout the corridor, most of which would be in upland locations.

\*Increased drainage and sedimentation would occur along the length of the trail during and immediately following construction, potentially impacting water quality and in-stream habitat. Construction BMPs and the vegetated buffer distance between the trail alignment and the Crystal River in many areas would reduce these impacts.

## Bridges

Fourteen potential bridge locations are identified in the study area. Some are new structures, while others are adjacent to or replacements of existing bridges. To the extent that trail alignment options utilize bridges to switch between Alternative A and Alternative B segments, new bridge abutments could result in impacts to wetlands, riparian habitat, or stream function. However, the location, extent, and significance of these impacts is not known at this time, since the exact location and span length of new bridges has not been determined."

Note that there are 13 new bridge structures proposed by the Final Trail Plan (pp. 176-179).

3. In Mark Beardsley's Report on the impacts of the trail on the Crystal River titled Impacts of the Carbondale to Crested Butte Trail on the Health of the Crystal River, November 8, 2017 (attached), Beardsley found that bridges presented the greatest risk of impacts to river health by the proposed trail. He concluded that 8 of the 10 new bridges proposed would have "high to very high levels of impact to the river because they cross at areas where the river has active floodplain and wider riparian area. . . . Building bridges in these locations would likely involve channelizing and armoring segments of the river and filling portions of active and functional floodplain with native riparian vegetation."

Photographs in the Beardsley report (Figures 1-17) clearly demonstrate the narrowness of the Crystal River Valley and the proximity of proposed trail alternatives to riparian, river bank and instream areas.

His report concluded the following regarding the risks to river health associated with any trail construction up the Crystal River Valley (emphasis added):

"This segment of the Crystal is generally a very healthy river, and special care is needed to protect it. Building a new trail up the valley will introduce long-term impacts to river health, and these impacts will be difficult or impossible to reverse in the future. It is important to weigh these sacrifices to river health, alongside other environmental impacts such as wildlife, vegetation and wetland, and cultural resources, against the social benefits of a trail. River impacts are especially important in this case, and considering these impacts when planning a project as big as the Carbondale to Crested Butte Trail is critical in order to minimize the amount of permanent damage to a healthy river that, itself, provides great social benefits."

To summarize, the County's own concerning conclusion regarding the potential impacts of trail implementation on the Crystal River is that "new structures or hardening (e.g., riprap, walls, bridge abutments, or piers) would further degrade or constrict the stream channel, or result in a significant loss of wetland and riparian habitat" within and along the Crystal River stream channel and floodplain. December 2018 Final Trail Plan, p. 52. Moreover, it is very significant that the stream and riparian scientist who led the assessment of river health for the Crystal River Management Plan in 2016, Mark Beardsley, has determined that the Crystal River is generally a very healthy river, and that building a new trail up the valley "will introduce long-term impacts to river health that will be difficult or impossible to reverse in the future." Because of that, Mr. Beardsley concludes that considering these impacts is critical to minimize the amount of permanent damage to a healthy river. Mark Beardsley, EcoMetrics, Impacts of the Carbondale to Crested Butte Trail on the health of the Crystal River, November 8, 2017.

If the Forest Service NEPA review is limited to just the segment that the County has proposed for review, there is a very real likelihood that these potentially significant impacts to the Crystal River from the trail and bridge construction contained in the trail plan would escape any environmental review at all. The river is clearly not a segmented environment. Moreover, there is no question that the County's Trail Plan contemplates the construction of the entire trail over an approximately 20 year time period. That is confirmed by the December

2018 Final Trail Plan which Pitkin County Open Space and Trails provided the Forest Service with a link to in its May 24, 2019 request for NEPA review. See Trail Phasing Schedule, Final Trail Plan, p. 262.

As noted above, potential impacts to aquatic resources are identified by the County both in the December 2018 Final Trail Plan and in the March 2018 Crystal River Section Environmental Review prepared by ERO Resources, Appendix B of the Plan (March 2018 updated). It should be noted that the County has addressed impacts to water resources in its Environmental Review of its Trail Plan under the section titled "Vegetation Resources" because it appears that the County has chosen not to investigate or address the potential impacts of its approved Carbondale to Crested Butte Trail to the Crystal River as a separate category of impacts. In addition, the County used "Evaluation Criteria" to evaluate and make recommendations for trail alignment that did not include consideration of Water Resources. The Evaluation Criteria used were: Environmental Factors (limited to Wildlife, Vegetation/ Wetlands and Cultural Resources), User Experience, Engineering and Cost. Final Trail Plan, p. 59.

In light of the potential for significant direct, indirect and cumulative impacts to the Crystal River and its associated riparian areas resulting from the trail and related bridge construction along much of its length up the Crystal River Valley, I reiterate my concern that Forest Service issuance of a FONSI for the small trail segment project which the County has asked it to approve will allow the whole Trail project, which the County has committed to move forward with, to be divided up into multiple actions, "each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." *Thomas v. Peterson*, 753 F.2d 754, 758 (9th Cir.1985). Because that would seem to violate the bedrock principles and goals of NEPA, to which the Forest Service has committed (40 CFR §1500.2(f)), I again respectfully request that in the process of assessing the direct, indirect and cumulative environmental impacts of the County's "Proposed Project" - the Redstone to McClure trail segment, the Forest Service evaluate the potential environmental effects of the County's planned construction of the entire Carbondale to Crested Butte Trail.

Given all of the potential riparian and water resource impacts, discussed above and documented in the attached, of the entire approved Carbondale to Crested Butte Trail, including its reasonably foreseeable alternatives, as well as the potential impacts to wildlife, vegetation and other resources that have been Identified by the County and others, I urge you to conclude that the issuance of a FONSI is not justified and that the preparation of a DEIS is required.

Thank you for your consideration of these supplemental comments.  
Sincerely,

Katherine Hudson, Resident of the Crystal River Valley

Cc:Kevin Warner  
District Ranger  
White River National Forest, Aspen-Sopris Ranger District  
620 Main Street  
Carbondale, CO 81623

Attachments:

Healthy Rivers and Streams Board 9-28-17 letter to Pitkin OS&T re River Impacts

County Response to HRSB re Carbondale to Crested Butte Trail Study

Beardsley Assessment of Impacts of Carbondale to Crested Butte Trail on Health of the Crystal River November 2017 (pp. 1-24)

Carbondale to Crested Butte Trail Study - Crystal River Section Environmental Review March 2018 (updated)  
(Appendix B to Carbondale to Crested Butte Trail Plan December 2018) (pp. 1-2, 17-24)

Carbondale to Crested Butte Trail Plan December 2018 - Final (pp. 1-2, 49-53, 59-60, 176-179, 262-263) (not  
attached because of file size)

Pitkin County 5-24-19 Request for Forest Service Review of Carbondale to Crested Butte Trail Proposal -  
Redstone to McClure Pass Segment