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Comments: From attached letter:

Comments on NVT Environmental Assessment Draft1May 2023Bob GoettgeWild Gunnison ValleyReno Divide Road ParallelI oppose development of this trail because of its negative effects on Wildlife, especially Elk.Below are my reasonsReno Divide Road ParallelDirect and Indirect EffectsPage 43-44[Idquo]Proposed trail would improve the recreation opportunity for mountain bikers and motorcycles by effectively substituting single-track trail for a primitive road for nearly the entire length of NFSR 759.[rdquo]I agree with this assessment.But I note that the EA mentions that the proposed trail may be less safe for users than the current trail. I agree that it may become less safe as use increases and the possibility of crashes increases.Page 44[Idquo]The proposed trail is unlikely to increase use of the area. It would simply absorb some of the use that is currently occurring on the road.[rdquo]I totally disagree. I think the new parallel single track trail with no ATVs will be a magnet especially for E-Bikers. The total of use of the old plus new trail will double or triple current singletrack use.Direct Effects - Page 95[Idquo]Edge (1982) found that elk use of preferred habitats was greatly reduced within 500m of human activity. This could reduce elk viability in the impact area by discouraging use in preferred habitats and pushing them into more marginal areas.[rdquo]This is key. As use increases of the new parallel trail, use will also increase on other trails in the area. The area of negative influence of the caused by the new trail will be large considering the many miles of downstream trails with an avoidance zone width of 1 km or more.Page 95Rocky Mountain Elk (Cervus canadensis nelson)-MIS2[Idquo]Determination:May adversely impact individuals, but not likely to result in a loss of viability in the Planning Area. Elk inDAU E-43 are currently meeting herd objectives. Additionally given the relatively high existing routedensity for most of the proposed option area, it is anticipated that elk are currently avoiding the projectarea during the primary seasons of use (June-October). [Idquo]I totally disagree with this determination and its greatly flawed reasoning. Elk avoid human activity ontrails not trail density. Although there is high route density there is relatively low activity.But the proposed new parallel trail will greatly increase use, particularly considering the boomingpopularity of ebikes.[Idquo]Rocky Mountain Elk (Cervus canadensis nelson)-MISSeasonal overlap of the proposed action with migration routes, calving, and preferred summer foragehabitats exists in the proposed option.Direct and Indirect EffectsDirect impacts to this species include vegetation removal and fragmentation of habitats. Additional trailsand users may impact this species.This can reduce overall available forage and refugia for Elk.[rdquo]Cumulative ImpactsP 95-96[Idquo]For proposed action, there is a remote possibility of cumulative effects to the Rocky Mountain Elk fromincreasing recreational trail demand and future trail proposals in the area. [Idquo]It[rsquo]s not a remote possibility. It is certain that the proposed action will increased recreational traildemands on Reno Divide Trail and many other miles of connected trails.[Idquo]Additionally, elk reproduction may be impacted by proposed trail options of Reno DivideParallel, Bear Creek and Doctor Park reroute and decommissions, and Upper Cement Creek to Crystaldirectly overlap with calving areas providing reduced opportunities for recruitment; however, these arelikely already impacted due to presence of roads.[rdquo]Again [ndash] its road proximity + activity that Elk learn to avoid, not solely the presence of roads. They are notalready impacted.Cumulative Impacts - General3The Reno Divide Parallel Trail should be the subject of an Environmental Impact Analysis.Cumulative Impacts All Sensitive and MIS SpeciesPage 95[Idquo]Past, present and reasonably foreseeable future actions that have cumulatively affected, and that will likely cumulatively affect, wildlife resources within the project area are related to development of public and private lands. This includes activities such as: mining, cattle grazing, timber harvest, travel management and recreation.[rdquo]I agree 100%. In support I quote CPW[rsquo]s Kevin Blecha from the Crested Butte News:[Idquo]Blecha traced the appeal of large game animals to hunters and to conservationists and said despite the high value Gunnison County residents and visitors place on having the wild ungulates here, their presence on the Gunnison Basin is in jeopardy due to several critical factors: long-term drought, cheatgrass invasion, lack of wildfire/forest regeneration cycles, new sprawling residential development, increasing recreational pressures and increasing highway traffic.