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Organization:

Title:

Comments: Mr. Russ Bacon, Reviewing Officer

Atten: Objections

USDA Forest Service

Medicine Bow-Routt National Forests and Thunder Basin National

Grassland

2468 Jackson Street

Laramie WY 82070-6535

Hahns Peak-Bears Ears Ranger District Atten: Mad Rabbit Trails Project 925 Weiss Drive

Steamboat Springs, CO 80487

Re: Mad Rabbit Trails Project

Kindly accept this correspondence as my objection to the draft decision notice and finding of no significant impacts for the Mad Rabbit Trails Project.

The problems created by the 44 miles of non-system illegal bike trails is entirely the result of the FS's failure to police the development and use of the trails. The FS has even rewarded the biking community by converting some illegal trails into legal trails as occurred on Buffalo Pass. The implication of the decision is that the FS will continue with this same lack of enforcement unless Mad Rabbit is constructed. The threat is not subtle. Not only is making such a threat an illegitimate basis upon which to justify the construction of biking trails in areas protected under the Colorado Roadless Rule (CRR), it also exposes that the FS staff handling this project is incapable of conducting the unbiased analysis required under the CRR and NEPA.

The analysis failed to include alternative locations for new biking trails outside of areas protected by the CRR, While the FS may have felt

constrained by keeping with only those the trails designated for funding under the 2A ballot measure, the source of funding is not the part of the required legal analysis. The analysis required under CCR and NEPA are not limited by the funding source. The alternatives not included within the 2A funding source were not given the consideration required by law.

As provided in my prior comments, the construction of linear roads intended for fast moving mechanical travel in areas protected by the CRR will significantly alter the undeveloped character of the CRAs. Under the CRR, the FS may not proceed without a full environmental impact statement. Moreover the FS's cumulative impacts analysis failed to adequately address the effects and impacts of all past, present, and reasonably foreseeable actions, which include (i) all bike trail projects in the Steamboat Ski Resort, Emerald Mountain, Spring Creek, and Buffalo Pass, and (ii) the expansion of parking on Rabbit Ears for snowmobile use.

While this cover letter constitutes a concise statement of my comments, please refer to my prior comments and objections in the letters I previously submitted on this project dated November 23, 2022, June 6, 2019, and November 18, 2018, copies of which are enclosed. Those letters, together with the enclosures submitted with those letters, are incorporated herein, for my complete comments.

I am submitting these comments based on my letter to the Forest Service, dated December 16, 2016, and the email from the Forest Service on October 22, 2018. I understand that an interested person for notice and appeal purposes.

Encl.