



Mad Rabbit Compromise Proposal Summary

Keep Routt Wild

June 9, 2022

OVERVIEW and HISTORY

Keep Routt Wild has offered a compromise proposal for the Mad Rabbit Trails Project based on the 2019 preliminary proposal from the US Forest Service. This proposal offers increased recreational opportunities for motorized and non-motorized recreation while minimizing the impact to wildlife and preserving Colorado Roadless Area characteristics. The proposal is summarized below, and reflects the historical and ongoing communication from Keep Routt Wild to the US Forest Service and Colorado Department of Natural Resources.

Since the compromise proposal is based on the 2019 USFS preliminary proposal, we have referred to the USFS trail segment numbering in that proposal. It is likely that the trail numbering for any new proposal would be different. Therefore, it is important to translate the trail numbers referenced below to the trail numbers of any new proposal. Additionally, to understand the specific reasoning behind our recommendations and proposals, it is advantageous to read our detailed comments to the Forest Service regarding the 2019 preliminary proposal, where we have included a trail-by-trail analysis. Those detailed comments may be found [here](#).

Later in the comment period, we submitted a second set of comments to the Forest Service regarding the 2019 proposal. This related to the purpose and need of the Mad Rabbit Trails Project. During the comment period Keep Routt Wild had acquired new public information, an analysis of Steamboat Springs trails by IMBA (International Mountain Bicycling Association). Here, IMBA assessed the trails in the Steamboat Springs area and prioritized the most needed mountain bike trail improvements. None of those were included in the Mad Rabbit preliminary proposal. We also found that all eight recommendations from IMBA could be met without a single excursion into a Colorado Roadless Area.

Keep Routt Wild's second set of comments may be found [here](#).

The Steamboat Springs mountain bike trails analysis from IMBA may be found [here](#).

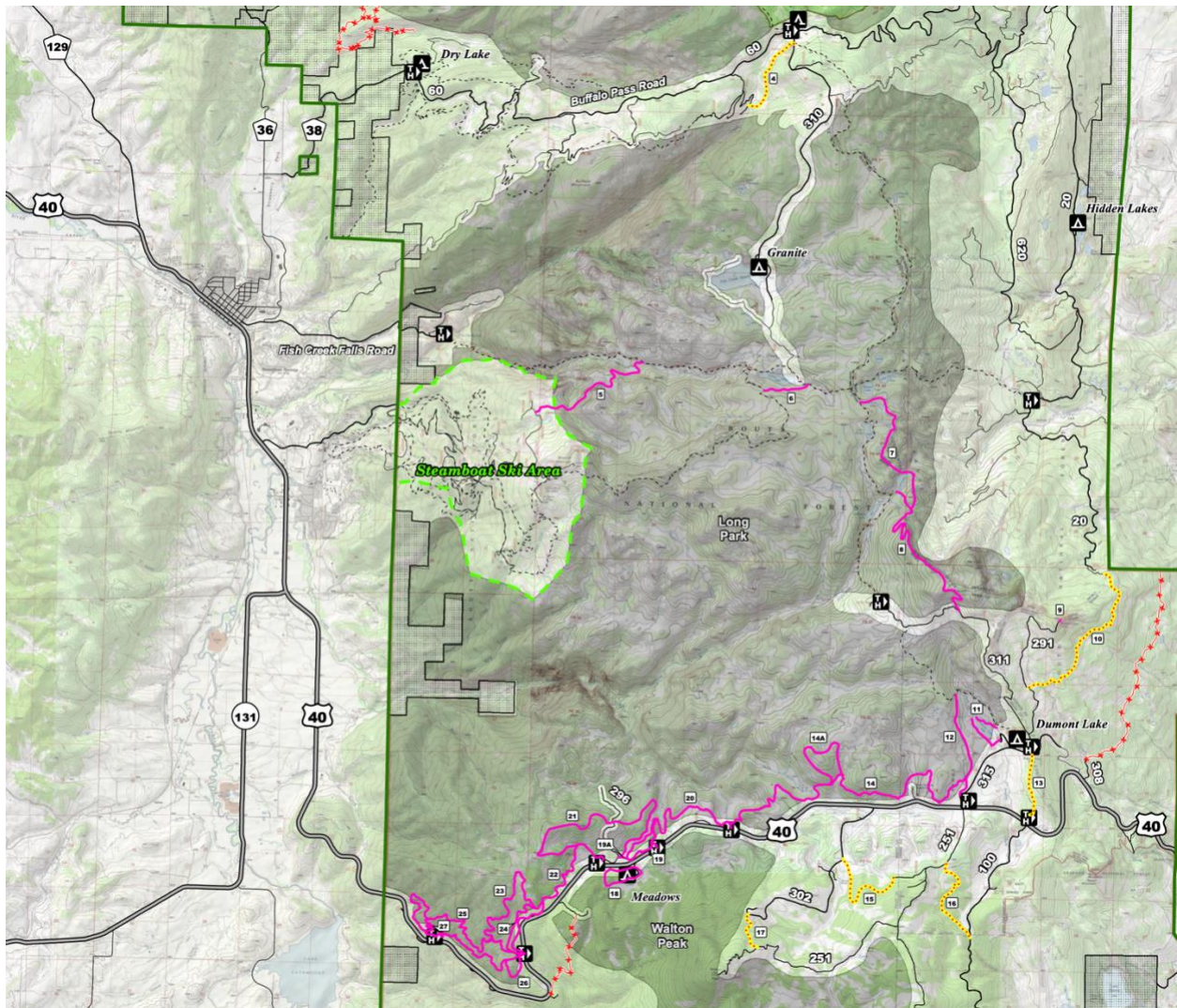
After we submitted the above comments related to the 2019 preliminary proposal, new information was released by CPW (Colorado Parks and Wildlife). Specifically, CPW updated mapped elk production areas due to data collected from radiocollared elk. A map of the updated elk production areas combined with the Mad Rabbit preliminary proposal can be viewed [here](#). This new data shows many of the proposed trails north of US40 are in elk calving areas. We have since recommended moving these trails to the south of US40. This would move

those trails outside of CPW-indicated elk production areas and also move some trails outside of the Long Park CRA.

KEEP ROUTT WILD COMPROMISE PROPOSAL

The trail-by-trail compromise proposal uses these trail segment numbers from the USFS July 2019 preliminary proposal: [2019 Mad Rabbit Trail Segments](#)

A map of the 2019 Mad Rabbit Trail Segments is also shown below.



TRAIL-BY-TRAIL COMPROMISE SUMMARY

Mad Creek: We agree with the brushing in of unauthorized trails and have volunteered to organize a volunteer effort to do so.

OHV Trails (shown as yellow with black dots): We endorsed all OHV trails except Trail #10, which is problematic due to its connectivity. This connectivity will dramatically increase OHV traffic through elk summer range and should be eliminated.

New Non-Motorized Epic Trail along US-40: We endorsed this concept with some modifications in our 2019 comments. We now believe routing it on the south side of US40 should be preferred to avoid the newly indicated elk calving areas. This also moves several trails outside of the Long Park CRA.

Details are:

-We support a singular connected trail to the south of US40 to provide, both, short trail use and longer epic trails experience, particularly when connected to existing trails north of Dumont Lake via the Dumont Lake entrance road. Related to that are the following specific trail proposals:

-Trails 19, 19A, 20, and 14 are the essential components to an epic trail experience. We support the purpose of these trails, but they should be moved to the south of US40. This removes them from CPW-indicated elk calving areas as well as the Long Park CRA. We have recommended this for some time. To our knowledge, no investigation of this alternative has been performed by the Forest Service. Since it is impossible to start construction of Mad Rabbit trails this year, summer offers an opportunity to investigate a southern routing with minimal impact to the Mad Rabbit schedule. We believe that investigation of this alternative is compelled under NEPA.

-Trail 21 routes too deeply into the CRA and traverses elk calving areas. It should be eliminated.

-Trail 14A is a loop deep into a CRA and traverses an elk calving area. It should be eliminated.

-Trail 12 is unneeded, intrudes into a CRA, and should be eliminated or routed adjacent to the Dumont Lake access road.

Campground Trails (Trails 18 and 11): We endorse the trails at Meadows and Dumont Lake. However, the planners need to be very careful of trail impact at the Dumont Lake inlet and outlet due to the wetlands there.

Continental Divide Trails: Adding Trails 7 and 8 will create loops that will lead to a) increased user conflict, b) altering the undeveloped characteristics of the Long Park CRA, c) creating islands of habitat loss and fragmentation in elk summer range, and d) increased maintenance costs. There should be no loops along the CDT. However, if the USFS prefers another location

for the CDT, we have no objection to moving the single CDT to another location while obliterating the previous trail. We created a conceptual drawing of this in our 2019 comments. Since the 2019 proposal, the Continental Divide Trail Coalition has proposed yet another alternative routing of the current CDT in this area. This is a reasonably foreseeable action under NEPA and severely complicates the alternatives. We highly recommend taking no action regarding trails connecting to the CDT until this is resolved.

Long Lake Bypass: We have no objections to Trail 6, the Long Lake Bypass.

Fish Creek: Trail 5 is very problematic. First, there is no current user conflict on the current Fish Creek trail, bringing the purpose and need of this trail into question. However, the new trail connects to the ski area and brings new users into an area of the Long Park CRA not currently impacted by humans. It also represents a NEPA connected action with the Ski Area Expansion in that area. It should be eliminated.

Ferndale/Trails west of West Summit: This dense network of trails (Trails 22 through 27) is problematic and should be eliminated. These are trails are a) high density (4.9miles/sq-mile), b) difficult to enforce trail closures, c) include elk calving areas, d) heavily impact the undeveloped characteristic of a CRA, and e) have severe parking issues. The expected user densities of these trails are likely to exceed the limits of primitive and semi-primitive trails, and thus exceed the user density defined for Colorado Roadless Areas. Please note that the Colorado Roadless Rule states that any development that significantly alters the undeveloped characteristic of a Colorado Roadless Area automatically triggers an EIS.

The above summary is simplified. Please refer to our original comments for details of our analysis.

The above comments focus largely on wildlife and Colorado Roadless Area characteristics. There are also some significant process issues related to NEPA and the Colorado Roadless Rule. Please find at the link below a letter from our counsel, Robert Randall of KKR, to the Forest Service detailing some of the process issues presented by the 2019 Mad Rabbit proposal.

Thank you for your consideration.

Sincerely,
Keep Routt Wild

RESOURCES

The following documents are linked below.

[Mad Rabbit 2019 Preliminary Proposal Map and Trail Segment Numbers](#)

[KRW Comments to 2019 Mad Rabbit Preliminary Proposal](#)

[KRW Secondary Comments to 2019 Preliminary Proposal Regarding Purpose and Need](#)

[IMBA Study Referenced in Secondary Comments](#)