



COLORADO

Parks and Wildlife

Department of Natural Resources

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Chad Stewart- District Ranger
United States Forest Service
925 Weiss Drive
Steamboat Springs, CO 80487

ATTN: Mad Rabbit Trails Project

Dear Mr. Stewart,

Thank you for the opportunity to provide input on the Mad Rabbit Trails Project (MRTP) located in the Hahns Peak/Bears Ears Ranger District (Routt, Jackson, and Grand Counties, CO). Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and comment on projects that may have impacts on wildlife resources and associated recreational opportunity.

The MRTP includes Proposals A and B. Proposal A includes approximately 79 miles of trail and Proposal B includes approximately 68 miles of trail. Additionally, the Buffalo Pass Trails project, which was implemented in 2016, is located in the near geographic center of the MRTP proposal. The Buffalo Pass Trails Project (BPTP) is nearing completion with approximately 40 miles of trail in total. The 2015 Forest Service Trails Master Plan was developed to guide summer motorized and non-motorized trail planning in the District. The future desired condition identified in the plan includes the need to be within natural resource and management capacity; to provide for a full range of experiences, opportunities, and accessibility levels; and to not require additional direct maintenance or infrastructure costs to the district. An important component of this plan is balancing the needs of today with the needs of the future while at the same time recognizing the limited and sensitive natural resources available to sustain recreational activity.

We realize the many functions the United States Forest Service (USFS) lands provide including important recreational opportunity in North West Colorado. With an increasing human population in Colorado expected to grow to eight million people by 2040, resource management requires thoughtful planning and development of recreation on our public lands to engage and inspire future generations of Coloradans and visitors alike. The majority of population growth will occur along the Front Range, with many of these citizens traveling to destination locations to recreate on our public lands. Broader access and a variety of recreational opportunities will help increase understanding and awareness for how outdoor recreation affects natural resources.

Outdoor recreation is one of the greatest drivers of Colorado's economy and is one of the fastest growing activities in the state. Developing new trails that serve a variety of outdoor recreational users can help bolster local economies and play an integral part in allowing local



businesses and governments to thrive in rural areas of North West Colorado. Destination locations such as Steamboat Springs can benefit from improving existing trails and creating new trails in the surrounding National Forest that will provide opportunities year around, for different user groups, and for people of all ages and backgrounds.

As mentioned previously, understanding and awareness for how outdoor recreation affects our natural resources is also an important component of future trail development. With the expansive growth of our human population throughout Colorado, there are ever growing needs and demands on our limited natural resources. In addition to connecting people to the outdoors, CPW is also responsible for conserving wildlife and habitat to ensure healthy sustainable populations and ecosystems. While these two goals may at times appear contradictory to one another, finding a balance may be possible as there are ways in which we can minimize, mitigate, or avoid these impacts.

In an effort to provide the USFS with input on the MRTTP we will breakdown our comments into four sections; trails recreation and wildlife, landscape scale cumulative effects of development, small scale effects of trail development with an analysis of proposed trail segments, and strategies for minimizing, mitigating, and avoiding impacts.

Trail Recreation and Wildlife

Outdoor recreation associated with trails influences a variety of wildlife species in multiple ways. Impacts to wildlife from trail use are often negative and are associated with increased direct disturbance and displacement from optimal habitats due to avoidance of human activities. Increased movements to avoid human activities result in more energy use. Higher energy demand effectively decreases the carrying capacity of an area (Taylor and Knight 2003) and increases stress on individual animals. Many wildlife species also avoid areas of human disturbance completely, which decreases the amount of available habitat (Taylor and Knight 2003). Cumulatively, this leads to both immediate and long-term effects on individual animals and populations by decreasing the available energy for winter survival, growth, and reproduction, reducing the fitness of wildlife, and by displacing wildlife into marginal habitats (Miller et al 2001, Anderson 1995). Many wildlife species that are negatively influenced by trail recreation often times will not become habituated to recreational use.

Bird species have shown a diverse reaction to trail development and the associated recreation. One study in Colorado demonstrated that in forest and mixed-grass prairie ecosystems, generalist species were more abundant and specialist species less common near recreation trails (Miller et al 1998). Specialist species are often listed as species of special concern, threatened, or endangered, since these species are dependent on specific habitats and are less adaptable to habitat modification. Several of the forest bird species mentioned in the study, which are found in greater numbers farther from trails, are present in the MRTTP area. These species include western wood-pee-wee, chipping sparrow, and Townsend's solitaire. Other studies have documented greater nest predation near trails, which can decrease local bird populations (Miller et al 1998, Gutzwiller 1995).

Elk frequently do not adapt well to trail based recreation. Elk increase their daily activity levels and movements in the presence of mountain biking and hiking which reduces the time spent feeding or resting (Naylor et al 2009, Wisdom et al 2004). This increased energy demand occurs simultaneous with decreased forage intake and displacement to areas with poorer quality forage. The net result is a decrease in body condition, which affects the chance of

individual health, survival and reproduction (Bender et al 2008). Where trail construction is proposed, displacement of elk from USFS lands to adjacent private lands may occur, which can lead to an increase in agriculture/wildlife conflicts. Elk that reside in the project area during the late spring, summer, and fall migrate west to lower elevations. Some of these animals will migrate to the western sides of Routt County and to Moffat County. Others will migrate to lower elevations between high-density human developments (Steamboat Springs), or onto agricultural lands south and north of Steamboat Springs. In Jackson County, elk will migrate to lower elevations to agricultural lands. Elk in the southern parts of the project area migrate from Jackson and Routt counties into Grand County north of Kremling.

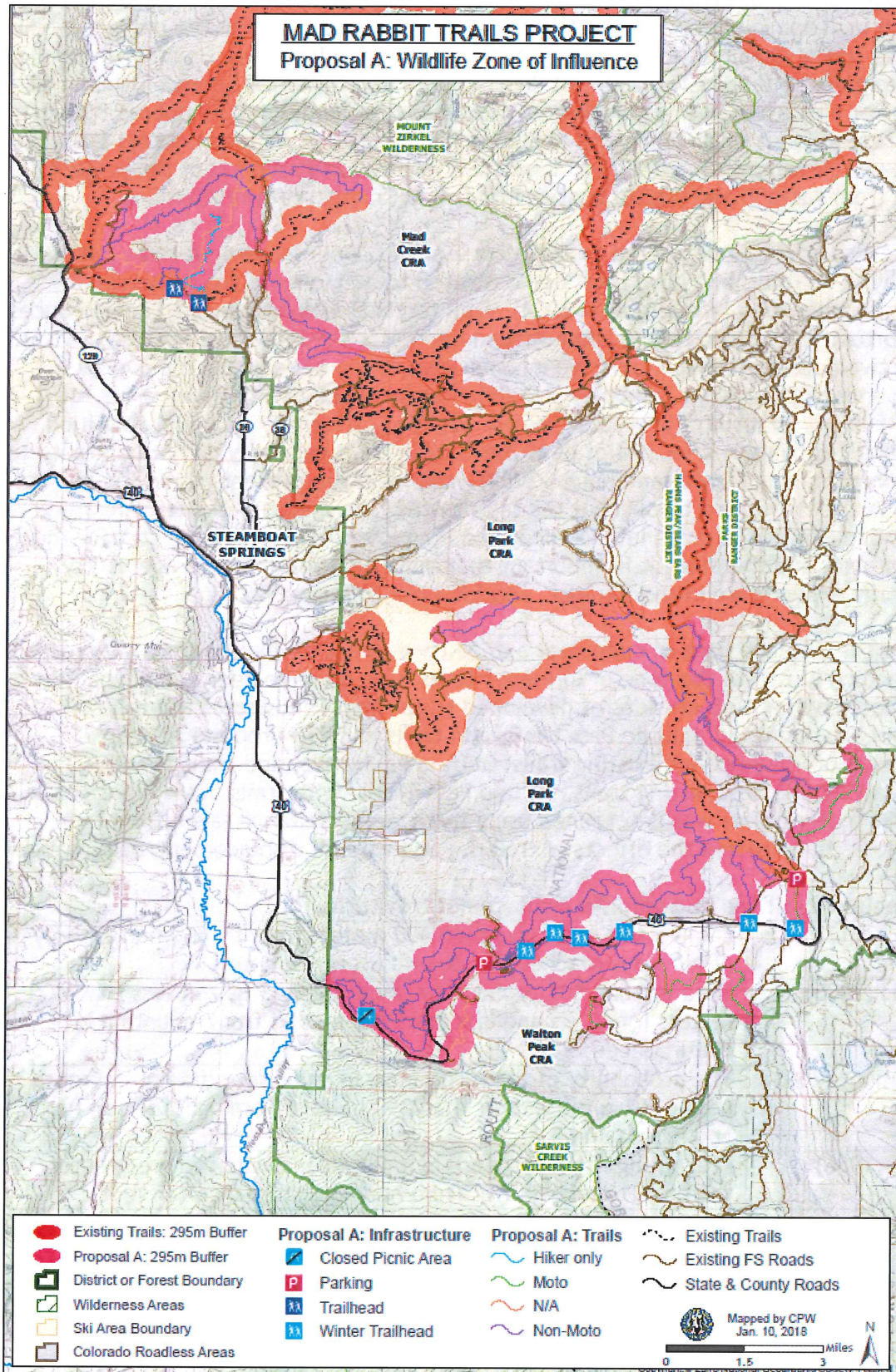
Mule deer are also adversely impacted by trail development. Deer movement rates during the day, especially in the morning, have been demonstrated to be higher in the presence of mountain biking and hiking (Wisdom et al 2004). Trail recreation disturbance to deer reduces foraging opportunity. Reduced forage and nutrition decreases the individual health, survival, and reproductive potential, which can have a cumulative effect of reducing the overall population (Bergman et al 2014, Bishop et al 2009). The presence of a dog with a recreationist is likely to result in a greater area of negative influence, including amplified avoidance distances by mule deer (Miller et al 2001). Mule deer generally do not habituate to hiking or mountain biking (Taylor and Knight 2003). Mule deer are present within the project area starting in the late spring throughout the fall months. The majority of deer migrate great distances west to Moffat County in late October and November. The energetic cost for these movements is high, and therefore it is important that mule deer maximize forage ability, minimize energy expenditure in the summer, and fall prior to migration.

To summarize the displacement of mule deer and elk away from developed trails we created three maps, which illustrate the zone of influence trails have on mule deer and elk habitat by using a 295 meter buffer on both sides of developed trails. Map 1 illustrates the zone of influence from existing trails, Buffalo Pass trails, and trails in MRTP Proposal A. Map 2 displays the zone of influence for existing trails, Buffalo Pass trails, and trails in MRTP Proposal B. Map 3 combines existing trails, Buffalo Pass Trails, with trails in MRTP Proposals A and B. The 295 meter buffer was determined using the average distance taken from four research projects that studied the effects of trail use and wildlife displacement/disturbance.

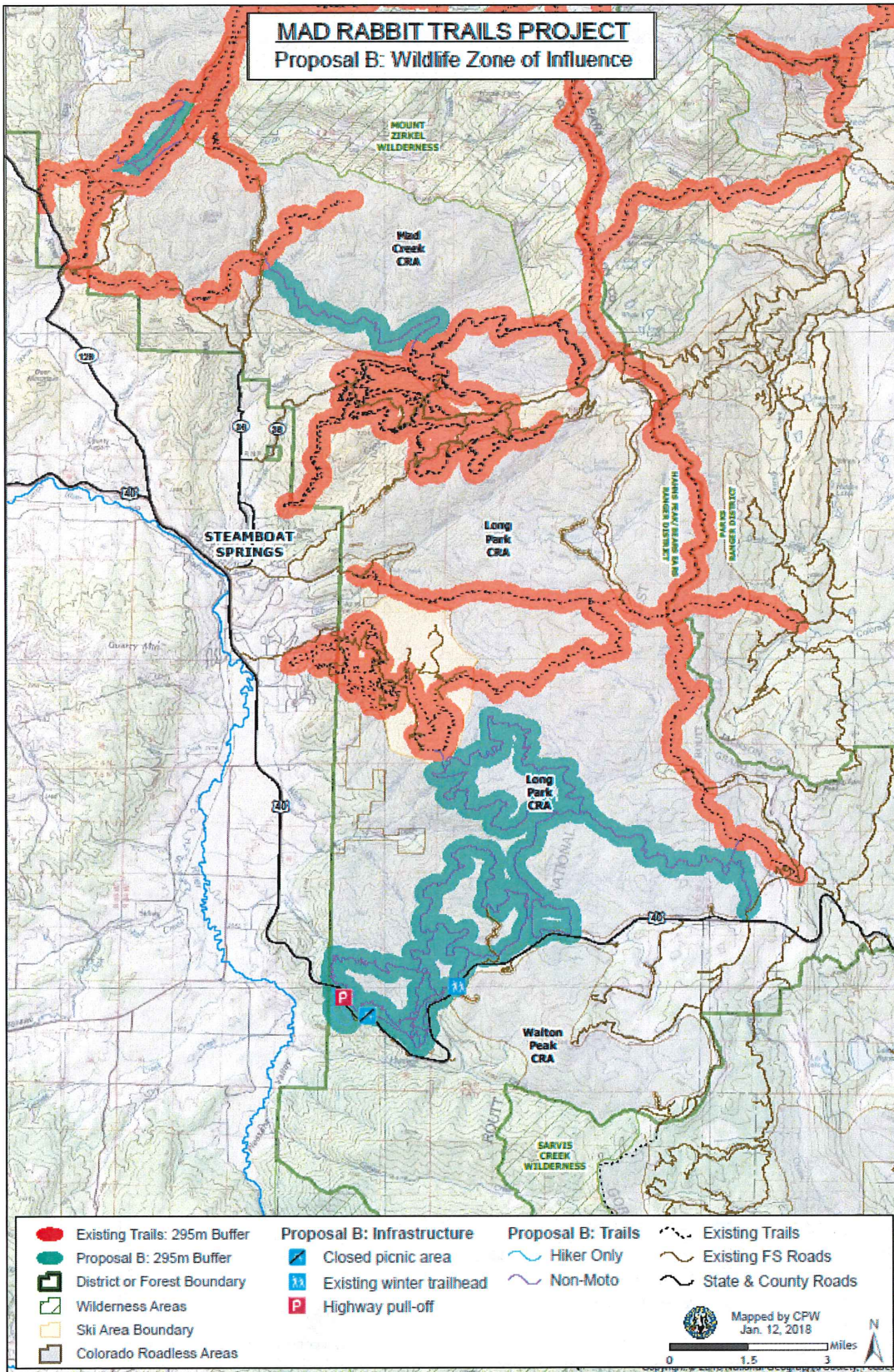
Table 1. Effects of trail use and wildlife displacement/disturbance.

Rogala et al. (2011)	Elk avoided areas less than 400 meters from trails when activity of all types reached one to two users per hour.
Wisdom et al. (2005)	Greater than 50% probability of elk taking flight at less than 400 meters for ATV's and less than 200 meters from mountain bike disturbance.
Taylor and Knight (2003)	The probability of flight response in mule deer did not decrease below 70% until greater than 390 meters from trail use (on foot and mountain bike).
Freddy et al. (1986)	Preventing flight response by mule deer would require greater than a 191 meter buffer from human disturbance (on foot).

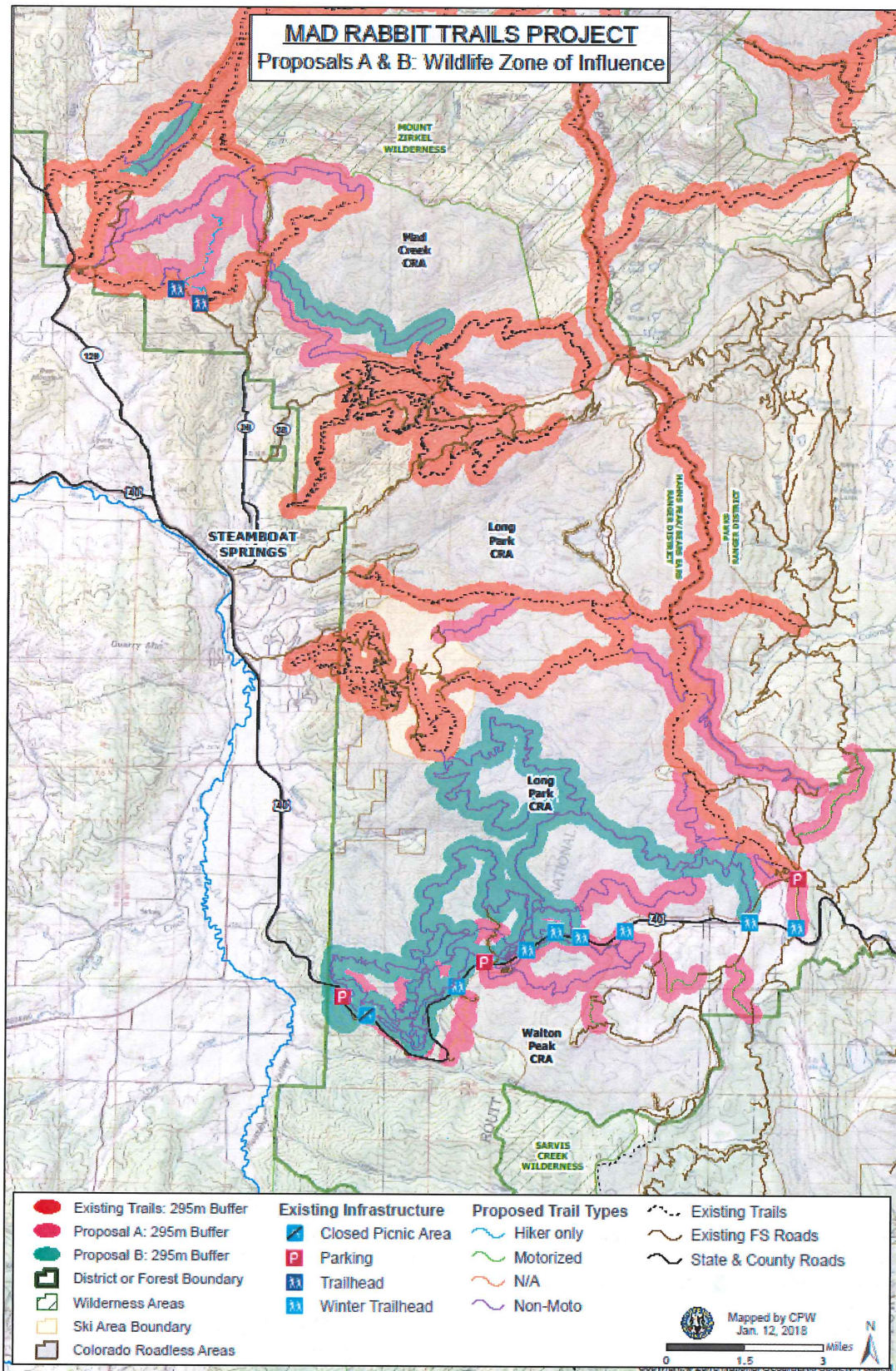
Map 1. Existing Trails, Buffalo Pass trails and trails in Proposal A within MRTP area:



Map 2. Existing Trails, Buffalo Pass trails and trails in Proposal B within MRTP area:



Map 3. Existing Trails, Buffalo Pass trails and trails in Proposal A and B within MRTP area:



From this research and GIS analysis, we summarized the effected acreage in Table 2. which describes the total disturbance created by current and proposed trail development within the MRTP area.

Table 2. Summary of effected acreage using 295 meter disturbance buffer.

<u>Using 295 Meter Buffer - Effected Acreage</u>	
Existing FS Trails (including Buffalo Pass)	33,758 Acres
<i>* Within the scoping project area</i>	
A + Existing Total	48,133 Acres
B + Existing Total	44,502 Acres
A: NEW Disturbance	14,375 Acres
B: NEW Disturbance	10,744 Acres
A: % change from existing disturbance	42.58%
B: % change from existing disturbance	31.83%
A: New Disturbance in CRAs	9,086 Acres
B: New Disturbance in CRAs	9,482 Acres

Landscape scale cumulative effects of development

The MRTP spans approximately 19 miles from south to north from U.S. Highway 40 to the Mount Zirkel Wilderness Boundary and Mad Creek. From the west to the east approximately 16 miles. There are proposed trails in concentrated areas located in the Rocky Peak Area, Mad Creek Colorado Roadless Area, linkages to Rabbit Ears and Rocky Peak from Buffalo Pass, Long Park Colorado Roadless Area, the area south of the Steamboat Ski Resort and north of Highway 40, concentrated use along the U.S. Highway 40 corridor and around Dumont Lake.

Trails range in elevation from approximately 7,000 to 10,500 feet MSL across a variety of ecological systems including mountain shrub communities, riparian wetlands, montane forests, and subalpine forests. Numerous wildlife species including nesting songbirds, raptors, elk, mule deer, moose, pronghorn, black bear, mountain lion, bobcat, American marten, dusky grouse, waterfowl, and a variety of other small mammals and mesopredators occupy these lands seasonally and in some cases year around

Given the scale of these proposals, we should take into consideration existing activities on the landscape as well as surrounding areas. Within the MRTP there is year around recreation including hiking, skiing (downhill and cross country), snowmobiling, camping, hunting, fishing, snowshoeing, motorized trail activity, and public land grazing. In surrounding areas outside of the project area there is high density human development along the Yampa River in Steamboat Springs, Steamboat Ski Resort, ranching and farming operations to the west along the Elk River corridor, to the west and south of Steamboat Springs, and on the east side of the Continental Divide in Jackson County.

With all of the competing uses of our public lands and with an already sizeable human footprint outside of the project area we must consider how development within the project area will effect wildlife resources not only inside the project area but outside as well. Routt and Jackson Counties have a rich agricultural history, which continues today and is an important component of our local economy along with the livelihood of our community members.

Private lands to the west and east of the project area support a variety of wildlife species. The majority of these private lands are at lower elevations and are used by wildlife during critical periods of year. Energetic costs to wildlife are high during winter months when they are seeking limited habitat for forage and refuge. In the spring, summer, and fall many of these species including elk, moose, and mule deer return to production areas and summer range, which are found at higher elevations within the project area. It is important for these species to forage, raise young of year, and seek refuge with minimal human disturbance.

As human activity increases at higher elevations during the spring, summer, and fall months it may alter temporal and spatial patterns of these species and causing them to remain at lower elevations, push them down to lower elevations depending on the amount of human activity, or constrain their range to limited refuge areas. The potential consequences include big game damage to growing crops, nurseries, hay meadows and stackyards. This a hardship that will be endured by our local producers and will be a responsibility of CPW to monetarily reimburse producers for damage caused by big game. There is also the potential for increased human-wildlife conflict in high-density urban development such as Steamboat Springs. CPW is responsible for managing these conflicts and ensuring the safety of our public as it relates to interactions with wildlife.

Within the project area, we must consider the cumulative impacts of landscape fragmentation, habitat encroachment, and habitat damage. Two significant landscape features within the project area do not have formalized trails systems and minimal human activity. These areas include the following geographic boundaries:

1. Mad Creek Colorado Roadless Area - bounded on the south by Soda Creek, the Mt. Zirkel Wilderness to the north, east to the continental divide, and on the west by Elk Park Road. This area encompasses approximately 12 square miles.
2. Long Park Colorado Roadless Area - bounded on the south by U.S. Highway 40, the SUP Boundary of Steamboat Ski Resort to the north, to the west by Storm Mountain Ranch, and to the east by Dumont Lake and Forest Road 311. This area encompasses approximately 22 square miles.

Both of these areas are important from the standpoint that human activity is dispersed and limited giving wildlife an opportunity to remain with little human disturbance. The proposed trails within the MRTP, existing trails (motorized and non-motorized), the Steamboat Ski Resort, and private lands surrounding these areas already have moderate to high human activity. Fragmenting these landscapes with trails and increased human activity may be deleterious to wildlife populations for a variety of reasons.

It is our recommendation that trail development be concentrated in areas where moderate to high human activity already occurs. Proposal A depicts a system of trails that generally parallel U.S. Highway 40 between Ferndale and the East Summit of Rabbit Ears Pass. Although

new trail development may increase overall disturbance and possible displacement of wildlife this trail system will allow for a variety of recreational activities, and connect the western side of Rabbit Ears Pass to Dumont Lake. It is our recommendation to keep this trail system within ¼ mile of U.S. Highway 40 to minimize impacts.

Proposals A and B depict a trail that crosses through the Mad Creek Colorado Roadless Area from Dry Lake Campground in the Buffalo Pass Trails area to Elk Park Road and connecting into the Mad Creek Area. Although this trail bisects through the approximately 12 square miles of the Mad Creek Roadless Area, we do appreciate the forethought put forward by the Forest Service to propose this trail along the southern portion of this Roadless Area, thereby reducing the amount of fragmentation to this area. Proposal 'B' depicts a system of trail segments and loops located in the Long Park Colorado Roadless area (described above) which severely fragment this area along Walton Creek and other tributaries to Walton Creek. It would be our recommendation to avoid building trails in this area, and focus development along the U.S. Highway 40 corridor.

Trail Segment Analysis

Mad Creek & Rocky Peak Area

Several of the trails in the Mad Creek area in Proposal A are currently illegal social trails. We discourage the incorporation of trails that were illegally created; this can send the wrong message and promote further development of illegal trails. However, we do recognize that connecting trails to create loops provides users with a different experience not found when using a trail that terminates and requires the user to turnaround and cover the same ground they already passed through.

The Mad Creek area is adjacent to the Elk River corridor where there is both small and large-scale agricultural production. We are concerned with big game damage on agricultural lands as it relates to additional human pressure in the Mad Creek area. These long-term conflicts create a significant impact on CPW from both a financial and staff resource perspective. We want to minimize the possibility of elk leaving this area and traveling to lower elevations due to increased human activity. Trail proposals should minimize the number of miles of trails and focus to connect areas through shorter trail segments.

The two trail segments, which connect to the Rocky Peak trail, will allow for a continuous loop starting from Mad Creek to Elk Park Road to Trail 1206 and terminating along Hot Springs Creek near Routt County Road 129. The 2.9 mile section of trail north and west of Elk Park Road will connect to Trail 1206 and back to Elk Park Road. This new trail segment will also create a continuous loop by connecting existing trails. The 1.5 mile trail segment, which starts along Elk Park Road, then parallels the road and connects to a proposed 5.3 mile trail segment is not necessary and is duplicative of the Elk Park Road. This trail segment unnecessarily increases the zone of influence on wildlife. It is our recommendation that Elk Park Road be used in place of this trail segment. The 5.3 mile segment, which connects the Mad Creek TH to Trail 1118, bisects a large tract of land that does not have any designated trails. The two other trail loops previously discussed provide an exceptional user experience which encompass the entire Mad Creek area, this 3rd trail would create an additional two loops which may not be necessary and add considerable acreage to the zone of influence to wildlife in the area. The 2.2 mile Rocky Peak trail will increase the zone of influence on wildlife. However, we recognize the aesthetic characteristics and viewpoints of this trail and the careful approach to designing a trail, which avoids creek bottoms and drainages.

The overall conceptual design of the Mad Creek trail area balances the needs for recreation and wildlife. Our recommendation is to remove the 5.3 mile segment to minimize fragmentation of this area and the 1.5 mile segment, which parallels Elk Park Road. Given the geographic location and elevation of the Mad Creek area, we would suggest implementing seasonal closures similar to the one's already in place on existing trails in Mad Creek.

Gunn Creek Trail

The Gunn Creek Trail (4.2 miles) serves as a connector between the recently implemented Buffalo Pass Trails system (approximately 40 miles) and the Mad Creek area. Both Proposal A and B depict this trail but with different alignments. Proposal A shows an alignment that is lower in elevation, 1.7 miles less in total length, and decreases overall fragmentation of the Mad Creek Colorado Roadless Area when compared to the trail in Proposal B.

The Gunn Creek and Mad Creek Colorado Roadless Area have remained in a semi-primitive state and are important areas for semi-primitive recreation and wildlife habitat. Fragmentation of this landscape may reduce the overall recreational experience and available habitat to wildlife in the area. The zone of influence created by the proposed trail may have implications for migrating wildlife moving to lower elevations during the winter and potentially change distribution patterns, which have likely already been effected by the 40 miles of trail developed in the Buffalo Pass area that is directly adjacent to this area.

Long Lake Trail

The Long Lake Trail (0.6 mile) connection segment between Trails 1102 and 1032 is part of a moderately to heavily used recreation zone with several significant trail linkages between Fish Creek Falls, the Steamboat Ski Resort, Fish Creek Reservoir, and the current Continental Divide Trail. Adding this trail connection will have a minimal impact as it relates to the zone of influence on wildlife and will improve the recreational experience with a formal trail loop around Long Lake. Trail construction should take into the consideration BMP's to avoid sensitive habitat and wetlands. This trail along with others in the area are located in a summer concentration area for elk. It is likely that elk will avoid this location when human activity is high.

Trail Segment connecting Trail 1101 and 1032 on north side of Long Park

The 2.1 mile trail segment connection follows a ridgeline north west from Fishhook Lake to its connection point with Trail 1032. This trail segment would add a short cut to Trail 1032, which leads back to the Steamboat Ski Resort and to Fish Creek Falls. Trails 1101, 1102, and the proposed trail segment around Long Lake already provide the connectivity to these areas. This new trail segment may unnecessarily increase the zone of influence on wildlife in the area by creating an "island" of habitat that is surrounded on four sides by three existing trails and the proposed trail (See Map 1). The Long Park area is a known summer concentration area for elk.

Trail Segment connecting Fish Creek Trail to the Steamboat Ski Resort

The Trail segment proposed to connect the Fish Creek Trail to the Steamboat Ski Resort is approximately 1.9 miles in total length. The Fish Creek Trail is heavily used by a variety of recreational users. There have been user conflicts between mountain bikers and hikers in the past, and this trail could help alleviate some of these issues by allowing mountain bikers (and other users) an option to return to Steamboat Springs via the Steamboat Ski Resort. This trail segment would also provide an additional route that would add to the "epic" trails that have

been promoted by a variety of user groups throughout the trail development process in Steamboat Springs. The trail crosses through an area that does not have formally recognized trails, is considered an important area for refuge for wildlife, and crosses an important movement corridor. From a landscape scale, there are limited places within the MRTTP area where wildlife can move freely from higher elevations to lower elevations without crossing a trail with recreational activity. The location of this trail bisects one of these areas and should be carefully considered given the cumulative effects of the Buffalo Pass Trails Project and the MRTTP.

Proposed New Continental Divide Trail (CDT)

The CDT is a National Scenic Trail, which serves a significant purpose in connecting people to the outdoors and connecting a variety of landscapes across the Western United States along the Divide. The currently designated CDT trail to the west and south of this proposed trail is made up of a combination of non-motorized and motorized trail segments down to U.S. Highway 40, which does not follow the actual Divide. This may be an opportunity to create a new trail that follows the Continental Divide and disperses trail users so that it can be enjoyed in manner more consistent with the values associated with hiking on the CDT. This proposed trail adds to the zone of influence on wildlife. However, we recognize the importance of the CDT and the opportunity to connect people to the outdoors. What is unknown at this time is where the CDT will connect to the Rabbit Ears Range on the east side of U.S. Highway 40. There are concerns about new trails being developed east and south of Rabbit Ears Peak due to historical agricultural conflicts with wildlife in Jackson County. If the intent of this trail were to follow the actual Continental Divide, we would recommend that any future alignments avoid these areas.

Trail Segments connecting the new CDT to Rabbit Ears Peak and Grizzly Creek Road

The 1.1 miles of trail connecting the proposed CDT to Rabbit Ears Peak and Grizzly Creek Road will provide a new recreational amenity to trail users on the CDT. Rabbit Ears Peak is a well recognized and prominent landscape feature in the Routt National Forest. This connector will add to the zone of influence on wildlife. However, this is an example of compromise that can be made to recognize the importance of outdoor recreation and connecting people to the outdoors.

Motorized Trail Segment connecting Grizzly Creek Road and Forest Road 20

The trail segment proposed between Grizzly Creek Road and Forest Road 20 would connect the Dumont Lake area to the east side of the Continental Divide in Jackson County. This road connection would eliminate significant travel times between these two areas. This trail connection would effectively connect the Rabbit Ears area to Buffalo Pass via a second route. CPW staff discussed this proposed trail segment with USFS personnel and expressed concerns about increased recreational activity south and east of Rabbit Ear Peak. There has been documented big game damage on agricultural production in Jackson County east of Rabbit Ears Peak due to big game being pressured to lower elevations. Additionally, new oil development in Jackson County not far from this area has added to the cumulative pressure on wildlife in the area. CPW staff also recommended the complete decommission and rehabilitation of all other USFS trails and roads south and east of this trail segment.

Dumont Lake Trail

The proposed Dumont Lake Trail will include the improvement and designation of 1.1 miles of trail. CPW owns and operates the dam that impounds Dumont Lake. It was built on the Routt National Forest under a Special Use Permit from the USFS. CPW owns a water right in the lake

and is currently stocking the lake with sport fish for anglers. A social trail exists around the majority of the lake, likely created by the fishing public. The west and north side of the reservoir are riparian and wetland areas. Depending on the time of year, this area is difficult to pass through. Beaver dams are located on the north side of the reservoir and create some of the diverse habitat that exists here.

We believe that it is important to protect these valuable habitats for fish and amphibian species. It is unknown at this time of all occurrences of amphibians in the area. It is our recommendation that the analysis of this trail include presence/absence surveys and inventories of amphibian species including boreal toads. Any influences to riparian or wetland areas should be mitigated on site, or as close to the site as possible. If this trail is developed, BMP's should be used to minimize disturbance to the wetlands and riparian area.

The proposed alignment of this trail appears to cross over the west side of the reservoir where there is a concrete dam structure. The water control structure consists of a narrow concrete dam with approximately a four foot cut out where boards hold back the water in the lake. Currently there is no safe way for the public to cross this structure. CPW personnel require access to this water control structure and need to be consulted with regarding any new developments and construction at this location.

The Dumont Recreation Area is heavily utilized year around by recreationists. A variety of wildlife species are known to exist here during different periods of the year; moose, elk, mule deer, pronghorn, black bear, and mountain lion. With increasing human activity, a concerted effort needs to be made to minimize conflicts with wildlife. We recommend placing signs along trails and in developed areas to inform the public about how to minimize these conflicts. There are variety of bird species that utilize Dumont Lake and surrounding areas, waterfowl including ducks and geese, herons and sandhill cranes. We recommend avoiding nesting areas and disturbance when these species are present.

Dumont Lake is a popular hunting/camping area. Hunting is an important component of outdoor recreation, helps achieve harvest management objectives, and provides economic benefit to local communities. CPW would like to maintain the opportunity for hunting in this area. We recommend construction activities of new trails be avoided during the big game hunting seasons and springtime for calving and fawning.

Motorized Trail Segment connecting Forest Road 100 to Forest Road 251

CPW recognizes the development of this road for purposes of creating access to areas without requiring users to go from Forest Road 100 to U.S. Highway 40 and then back to Forest Road 251. This connection will serve as an aid to a variety of users along with the hunting public and would create new dispersed undeveloped camping locations.

This motorized road location is within overall range and summer concentration area for elk, black bear, mule deer, mountain lion and pronghorn. Wildlife migrate from this area from Routt and Jackson Counties to their winter range in Grand County. CPW recommends conducting surveys during the analysis to ensure impacts to fisheries, amphibians, and nesting raptors are minimized or avoided. This trail will add to the zone of influence on wildlife. However, we recognize the importance of including new motorized trails to this proposal and the connectivity between different road segments.

Motorized Trail Segment connecting U.S. Highway 40 to Forest Road 315

This trail segment is currently recognized as a winter motorized trail for snowmobile access. Adoption of this trail into year around activities may have an impact on wildlife resources and increase the overall zone of influence on wildlife. Big game species and a variety of other wildlife avoid this area due to winter conditions and motorized activity. As snow recedes in the spring and early summer wildlife return to this area. CPW also recognizes the need for additional trail access along the U.S. Highway 40 corridor to distribute recreational users. This particular location already includes a developed trailhead with a restroom and parking area.

Trail Segment connecting U.S. Highway 40 to Trail 1100

The proposed 1.7 mile trail segment connecting U.S. Highway 40 to Trail 1101 resides between Dumont Lake and an existing trail that connects U.S. Highway 40 to Trail 1101. One-quarter mile west of this proposed 1.7 mile trail is the Colorado Department of Transportation (CDOT) work center and an existing Forest Service road, directly adjacent and to the north of this work center is an existing trail that connects to Trail 1101. We recommend using this existing trail, which provides a loop to Trail 1101, and back to Dumont Lake, thereby creating the same mileage but eliminating duplication of new and unnecessary trails.

Motorized Trail Segment (0.6 miles) connecting Forest Roads 302.1 and 251

The proposed 0.6 mile connector between Forest Roads 302.1 and 251 is a small segment of trail that will help connect two different Forest Roads that would normally require users to back track out several miles to U.S. Highway 40 and work their way around to the other trail respectively. We recognize that connecting trails to create loops provides users with a different experience not found when using a trail that terminates and requires the user to turnaround and cover the same ground they already passed through. Although this adds to the overall zone of influence to wildlife, the 0.6 mile segment will serve a number of recreational users.

Motorized Trail Segment connecting Forest Roads 302.1 and 251

The proposed 1.5 trail connector between Forest Roads 302.1 and 251 is similar to the proposed trail discussed previously in the Mad Creek Area, in that additional loops are not necessary; add to the zone of influence affecting wildlife, and fragment larger pieces of continuous habitat. The 0.6 mile trail connector discussed directly above serves the same purpose as this proposed trail segment but provides a much larger loop. We would recommend that this trail be avoided.

28.5 Miles of trail segments, loops, and concentrated use areas north of U.S. Highway 40

In proposal A there are approximately 28.5 miles of trail segments, loops, and concentrated use areas north of U.S. Highway 40. As stated previously it would best serve the wildlife resources and associated habitat by concentrating activity into areas where human activity already exists. The Rabbit Ears area can serve as a major corridor and connector to Dumont Lake, which connects to the CDT, Steamboat Ski Resort and Buffalo Pass.

During previous discussions with USFS personnel, CPW staff recommended these trails stay within ¼ mile of U.S. Highway 40 to minimize the zone of influence on wildlife and to minimize encroachment into sensitive wildlife habitat. Most of the proposed trails in proposal A are within these recommendations. The old U.S. Highway 40 grade that exists north of U.S Highway 40 should be fully utilized for trail activities. The winter hiking, snowshoeing, and skiing routes north of the U.S. Highway would also work well for summer recreational

activities as long as they stay within or close to ¼ mile of U.S. Highway 40. There are four trails segments, which go beyond this and add considerable acreage to the zone of influence on wildlife. These trail segments do not have names but will be referenced by their trail mileage, 2.4, 2.7, 1.3, and 8.1.

It is our recommendation that trail segments 2.4 and 2.7 be eliminated or moved south of their current location. Trail 1.3 can be moved south closer to U.S. Highway 40 following topographic features consistent with hiking and biking trails. Trail 8.1 on the western portion should be moved south closer to U.S. Highway 40 and then continue east to the existing USFS road and trail in vicinity of the CDOT work center. The 8.1 mile segment turns to the north and duplicates the existing trail which goes from U.S. Highway 40 to Trail 1101 (CDT), and duplicates the proposed trail segment between Dumont Lake and the trail next to the CDOT work center. This will result in a net reduction of trail mileage, effected acreage related to the zone of influence on wildlife, but still provide a quality recreational experience and connect the western end of Rabbit Ears Pass (also known as Ferndale) to Dumont Lake.

8.5 Miles of trail segments and loops south of U.S. Highway 40

In proposal A there are approximately 8.5 miles of trails proposed which consist of two loops and two trail segments, which in themselves create an additional loop. Thoughtful consideration was given to this trail development by giving recreationists the opportunity to use a variety of loops and connecting trail segments. We recommend moving the 3.2 mile loop further north towards U.S. Highway 40 to minimize the amount of fragmentation created by this loop and to reduce the effect of creating an island of wildlife habitat surrounded by human activity on trail segments to the north and south. It is unknown how effective this island of habitat would benefit wildlife species in the area.

Proposal B Long Park Colorado Roadless Area and Concentrated Use in the Ferndale Area

Proposal B illustrates a number of trails and loops located in the Long Park Colorado Roadless area. The proposed trails cross or are in close proximity to a number of streams (Fishhook, Hogan, Walton, McKinnis, Storm King, Bear), wetlands, riparian areas, encroach into sensitive habitat, and dramatically fragment this nearly 22 square miles of semi-primitive to primitive landscape with no formalized trails. The majority of trails in Proposal B are located in this area. Proposal B includes 10,744 acres of land mass that are included in the zone of influence on wildlife, 9,482 of those acres are within a Colorado Roadless Areas.

The MRTTP proposal has focused on connecting regional recreation areas (Rabbit Ears, Dumont Lake, Steamboat Ski Area, Buffalo Pass, and Mad Creek), with concentrated use along U.S. Highway 40. The proposal of trails in this area is outside of that scope, would create significant impacts to wildlife and associated habitat, and would be difficult to offset at other locations.

Strategies for Minimizing, mitigating, and avoiding impacts

Timing and seasonal restrictions

The use of timing and seasonal restrictions to protect sensitive habitats and wildlife should be considered in this proposal for individual trails segments and concentrated use areas. In the project area there is year around recreational activity. Some of these activities occur when sensitive wildlife species are absent, others occur during periods of the year when wildlife are present and require additional protections through closures.

In general, it is our recommendation to enact seasonal closures for those species that are present and sensitive to human disturbance (behavioral response and energetic costs) in the project area and in locations where wildlife activity is associated with reproduction, foraging, resting, conserving energy, and migration. Winter concentration areas, winter range, migration patterns, production areas, and summer concentration areas are of particular concern for elk and other species throughout the year. These areas reside within the project area and overlap with proposed trails in the MRTTP, which includes all of the following locations: Mad Creek, Gunn Creek, Buffalo Pass, Walton Creek, Ferndale U.S. Highway 40, Long Park, the proposed Continental Divide Trail, and the motorized trail proposed on the east side of Rabbit Ears Mountain. Although the Buffalo Pass trails system is not part of this specific analysis, this wide scale development has likely changed wildlife use patterns within this area pushing animals into adjacent locations where human disturbance is less. Thereby increasing the importance of protecting locations in other areas.

Geographic areas used by elk for winter survival and production typically span from December 1 to June 30 of the following year. The specific locations of these areas change over time, and may be dependent on annual climatic conditions. We would like to work with the USFS to negotiate closure dates that balance the needs for wildlife and the needs of our recreational users. In some cases, there may be overlap and a compromise will need to be made.

Minimizing conflicts with black bears and other predatory wildlife

The MRTTP includes the development of several parking areas and trailheads. These locations will have concentrated human activity along with restrooms and trash disposal. We suggest that educational signage be placed at all of these locations to inform the public on how to minimize conflicts and disturbance with wildlife. CPW can provide standard wording for signs and displays. The use of Interagency Grizzly Bear Committee Certified trash receptacles (trashcans and dumpsters) should be implemented at all of these locations to prevent bears and other wildlife from foraging on human supplied garbage. Outdoor recreationist should be encouraged to keep pets on leash or within voice control. At trailheads and on trails where human activity is expected to be high, leash requirements should be discussed in the analysis and potentially implemented.

Support for research study

There are a number of peer reviewed research studies that have assessed the impacts of recreation on wildlife and associated habitats. These studies have focused on how wildlife avoid trail activity, behavioral responses, along with many other factors. However, as trail development continues to occur in Colorado and in the western United States additional research needs to be completed to better understand these interactions and impacts along with developing strategies that will help minimize, mitigate, and avoid these impacts.

CPW would like to work the USFS on developing a research project that can add to the greater body of scientific knowledge that can be used by land managers across the United States to develop outdoor recreational opportunities while minimizing the impact to wildlife. The difficulty with conducting this type of research and at this scale is determining when development will begin to occur. Baseline data needs to be collected prior to implementation in order to detect differences between pre-development and post development over the length of the study. Funding for this type of study is limited and may require multiple partners to collaborate on implementing such an endeavor. We would hope that not only conservation organizations would play a part in this research but also recreational user groups. Peer-reviewed science can be criticized by people who disagree with the implications

of the results. If these groups are included in the framework and development of questions to be answered, it will help show the high level of transparency our agencies believe in.

Law enforcement

With any new proposal for development of trails and recreational activity, we must consider the development of new regulations to manage responsible use and to deter activities that will have negative consequences on natural resources and trail users. Law enforcement personnel available for active patrols who can educate users and deter illegal activity are severely limited in number. It is our understanding that one USFS Law Enforcement Officer and one Forest Protection Officer are available at any one time for both the Hahns Peak/Bears Ears Ranger District and the Yampa Ranger District.

Given the recent developments in 2017 of illegal trail development in the area south of West Rabbit Ears Pass and other illegal trail development and use in other areas, we would suggest funding two additional Forest Protection Officers on a seasonal basis when trail activity is at its highest. Although funding sources may be limited, there has been an up swell of support from local community leaders and citizens to prohibit and deter trail development and use. With local community support there may be other ways to seek out funding for this need.

In addition to law enforcement personnel, we suggest an amendment to the Forest Plan that would prohibit any off trail use of mechanized conveyances including bicycles. This will help protect sensitive habitat and confine activity to designated trails. Currently there is no prohibition for this activity, which allows bicycle riders to use illegal trails not formally adopted and designated. Many of the trails formally developed in the Buffalo Pass area and several of the proposed trails that are part of the MRTP were originally illegal trails. Although not condoning the development of illegal trails, this can send a mixed message and potentially promote further development of illegal trails.

The majority of trails proposed as part of the MRTP were developed from local user group input. These same entities and recreational groups should also take an active role in educating users and providing a level of volunteer enforcement to ensure that trails are used appropriately. It is our recommendation that local groups should provide a quantifiable level of support to curtail irresponsible, unethical, and illegal recreational activity.

Conditional Use Policies and Adaptive Management

With limited resources for patrolling and detecting illegal trail use and illegal trail development a set of conditional use policies should be implemented to deter this activity from occurring. A conditional use policy is based on the premise that when a trail is formally designated there should be a baseline of accepted activity allowed. If the use on a trail goes outside of this accepted baseline, a trail closure would be implemented until the issues are resolved. An example would include the detection of illegal trail development off of an existing route or in a concentrated use area. If this were detected the trail would be closed until the illegal trail was rehabilitated to its original natural state. If a seasonal closure to protect wildlife during critical periods of the year were implemented on a designated trail and trail use was detected during the trail closure period, the trail would remain closed beyond the closure period until the USFS or other trail support group could build adequate structures to prevent such ingress into the closure area. During this time period, it would be important to notify the public through different media outlets about these activities and the resulting closure that would affect all users. The underpinning principle of conditional use policies is social pressure. Law enforcement will not solve all of the issues with illegal trail

development, a concerned and actively involved public who support legal, sustainable, and responsible trail use must be part of the equation to help us resolve these issues. If a trail is closed because of a small minority group of users, it will have an impact on everyone.

Adaptive management practices should also be utilized with any new trail development. The premise behind adaptive management is the ability to monitor new developments and evaluate whether the desired conditions are being met. If the desired conditions are not being met land managers can develop new techniques and actions to resolve the issue and work towards the desired condition.

Wildlife Habitat Improvement Endowment Fund

CPW staff in Steamboat Springs has been working to develop and implement a Wildlife Habitat Improvement Endowment Fund. The purpose of this fund is to improve and enhance wildlife habitat in areas critical for survival, forage and refuge. This idea embraces a philosophy that recognizes the importance of connecting people to the outdoors and how human activity and development have an impact on our natural resources. The fund allows our community, land managers, and conservation agencies to consider the effects of activities that are contrary to minimizing human disturbance on the landscape. We need to promote sustainable outdoor recreation and the enjoyment of our natural resources while at the same time improve what is limited and ensure it is there for current and future generations.

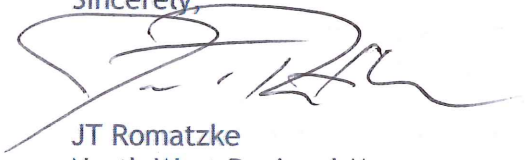
Several successful habitat improvement projects have been implemented in the Steamboat Springs area. These projects were the result of a collaborative effort between the USFS, CPW, Colorado State Forest, and City of Steamboat Springs. These habitat improvement projects focused on a variety of factors that benefited wildlife; increased diversity of flora to improve forage for a variety of species; creating diverse vegetative mosaics by removing decadent monocultures; improving understory for small mammals; habitat for passerines, and nesting birds. New projects could also include spring and water development, and the planting of native species and high quality forage. The only drawback to these projects is the lack of adequate funding to continue. A habitat improvement project completed today will likely need to be repeated again in two decades. An endowment fund can help solve this problem by having a fund that is perpetual and will benefit wildlife and our natural resources for the long-term.

Many of the proposed trails in the MRTTP overlap with habitat features that are critical for reproduction, survival, forage, and migration. As described previously in our comments there are direct impacts of trails development where wildlife will avoid human activity. All of these activities will begin to constrain where wildlife can seek out refuge and carry out the functions necessary for annual and long-term survival. We strongly encourage and recommend that any new disturbance to wildlife and habitat in the project area be offset with habitat improvement work in areas where wildlife are most constrained during critical periods of the year and in areas where improving habitat can help increase the probability of over winter survival. We would appreciate the opportunity to engage in collaborative discussions to solve how this Wildlife Habitat Improvement Endowment Fund should be funded and utilized to offset the impacts from trail development and human activity.

Again, thank you for the opportunity to provide input to the pre-scoping NEPA MRTTP. We look forward to continued dialogue and collaboration as this project moves through the NEPA process. Our staff in Steamboat Springs will always be available to answer questions and work

through the details outlined in this letter. The primary point of contact is Area Wildlife Manager Kris Middledorf, kris.middledorf@state.co.us, 970-819-3150.

Sincerely,

A handwritten signature in black ink, appearing to read 'JT Romatzke', written over a horizontal line.

JT Romatzke
North West Regional Manager
Colorado Parks and Wildlife

Cc:

Kris Middledorf - Area Wildlife Manager, Area 10
Lyle Sidener - Area Wildlife Manager, Area 9
Brad Petch - Senior Terrestrial Biologist

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January 12, 2018

Chad Stewart
District Ranger
Hahn's-Peak Bears Ears Ranger District
925 Weiss Drive
Steamboat Springs, CO 80487

RE: Mad Rabbit Trails Project

Dear Mr. Stewart:

The North Park Habitat Partnership Program (NPHPP) recognizes you and your staff are tasked with managing USFS lands under a sustainable multi-use concept to address the growing demands of a variety of different user groups. The members of the NPHPP committee appreciate the time spent and the work accomplished by the personnel of the Hahns Peak-Bears Ears Ranger District in trying to accommodate the needs and wishes of those that utilize the resources on USFS lands. While adding another layer of complexity to an already difficult task, the committee feels it is imperative that unintended impacts to neighboring landowners be taken into account when making management decisions on the USFS lands.

One of the purposes of NPHPP is to assist the Division of Parks and Wildlife by working with private land managers, public land management agencies, sportspersons, and other interested parties to reduce wildlife conflicts, particularly those associated with forage and fences on private lands.

For over a decade, the North Park HPP Committee has been working with private landowners, lessees, and USFS personnel to address conflicts directly associated with increasing recreational activity east of the Rabbit Ears Peak area. These activities are displacing large numbers of elk from USFS lands to adjacent private agricultural fields, creating conflicts between elk and the landowner's hay production.

Beginning in 2006, the committee has spent several thousand dollars to hire contract personnel to repeatedly haze elk off of the private hay fields in the months of June and July. While partially successful and manageable to date with the current levels of use, the development and subsequent promotion of a new trail and the general increase in recreation activity in this area remains a cause for concern.

The NPHPP committee is concerned with the motorized trail being considered lying east of Rabbit Ears Peak from USFS Road 20 to USFS Road 291 as identified in option A. This area is an important elk calving ground and is considered a summer concentration area for elk from late spring through fall. Our committee is concerned the establishment of this route in the area east of USFS Road 291, north of Highway 40, and south of USFS Road 20, will increase the amount of recreation in the area with the ultimate result of moving more elk off of USFS lands to the adjacent private lands and causing more damage to the agricultural fields on these lands.

The NPHPP committee would urge the Forest Service to examine alternatives that do not increase this conflict between elk and private landowners. NPHPP has assisted the Forest Service with projects in North Park in the past and we look forward to continuing this productive partnership into the future.

Sincerely,

A handwritten signature in black ink that reads "James A. Baller". The signature is written in a cursive style with a large initial 'J'.

James Baller

North Park Habitat Partnership Program