

Hahns Peak Bears Ears Ranger District
Medicine Bow – Routt NF
925 Weiss Drive
Steamboat Springs, CO 80487

Kimberley Vogel
Natural Resources Consulting
230 5th Street
Steamboat Springs, CO 80477

RE: MAD RABBIT TRAILS PROJECT

To All It Concerns,

Thank you for the opportunity to have a voice in this proposed project. The importance of this project to existing and future users of the National Forest is tremendous and deserves much exposure, awareness, and conversation. I look forward to being a part of that conversation.

My concerns surround process, multiple uses and appropriate use of national forest lands, wildlife, safety, adjacent private land, Colorado Roadless Area values, backcountry recreation values, and the sustainability of trails systems. On face value, the opportunity to use funding from Steamboat Springs 2A initiative funding is a huge windfall and makes this proposed project ripe for consideration. The challenge will be adequately displaying the trade-offs between such an intensive proposed trail system (mostly wheeled and motorized), and a lesser, safer, sustainable system allowing access and enjoyment of the national forest without significantly impacting wildlife, other multiple uses. I would ask for the development of an alternative which is driven by concerns around these issues. Without it, the trade-offs could not be displayed for the decisionmaker.

Process

The National Environmental Policy Act (NEPA) requires a full environmental impact statement (EIS) for projects “significantly affecting the quality of the human environment”. It would be difficult to understand how a proposed action of 68-79 miles of trail, connecting to another 40+ miles of trail, affecting thousands of acres of national forest, state, county, city, and private lands would not be significant enough to require a full display and discussion of alternatives. The acres of land affected is far reaching when we look at displacing wildlife, affecting wildlife habitat, and those effects to national forest and private lands outside the proposed trails construction area.

Additionally, this project, proposed to be funded by 2A funds, is connected to all other projects funding by these funds, both physically and by intent. It is therefore a **connected action** and the full effects of all the collective actions of this intent need to be displayed collectively and comprehensively. The cumulative effects to the human environment, the sustainability of all of the trails projects, affected wildlife, and adjacent lands fully need to be displayed.

Multiple Uses, Appropriate Use, and Safety

These trails are proposed by single use user groups which propose to design and construct trails for the thrill of riding and are intended to be used intensively by mountain bikers and/or motor bikes. This means that in many places they will not be conducive to the use of those traveling on foot. I would urge you to consider hikers when designing the trail system so that in places where speed is part of the

design that users would be separated to provide for a decrease in user conflict as well as the safety of pedestrian travel.

Is a 25 acre bike skills park an appropriate use of national forest lands? While I do not completely understand what is being proposed for this “park”, I do know what these areas look like in other City parks and private pay-for-use parks. These are not appropriate for national forest lands and do not fit into any desired condition for any management area on this national forest. They are best located in developed municipalities and would encourage mountain biking behavior (building of structures, jumps, etc.) on the national forest and adjacent lands, and create an expectation for this type of use on the national forest.

Wildlife

The density of trails proposed in both alternatives would fragment habitat and travel patterns for numerous wildlife species. Additionally, with the present location of the trails, elk would be disturbed and pushed to surrounding lands, including private lands. This would impact not only the elk herds, but private landowners, hunters, and wildlife viewing enthusiasts. Please develop an alternative or alternatives which address the impacts to critical wildlife species and reduce impacts.

Adjacent Private Lands

Undeveloped private lands around national forest lands provide an important buffer between developed municipalities and wildlands. They allow for the safe refuge and undisturbed hiding for wildlife pursued during hunting season and other wildlife species as well. Additionally, they provide a visual buffer from development for national forest recreationists. While landowners understand that they must protect their own lands from encroachment and trespass, the intentional location of trails and development on national forest which provides easy access and for intrusive behavior by recreationists, is just not in the best interest of good relations and cooperative land conservation management. Please develop an alternative which considers private lands and reduces the likelihood of encroachment and trespass from rogue trail builders with little to no respect for private lands.

Colorado Roadless Areas and Backcountry Recreation Area Values

The establishment of Colorado Roadless Areas did not prohibit new trails. However, the values and characteristics of roadless areas would be undermined by the intrusion of extreme mountain biking. As stated in the 2016 Colorado Roadless Rule Supplemental Environmental Impact Statement (SFEIS), “Protecting these vital natural areas are an important **climate adaptation strategy** as roadless areas provide **critical wildlife refuges** for wildlife in a **warming climate** and **protect headwaters** that provide drinking water for Coloradans.” Roadless areas have very specific value which is overarching and goes beyond the boundaries of this national forest.

The characteristics and values established in the Routt NF Plan for Backcountry Recreation Areas would also be undermined by trails built for speed and high volume use as is intended by 2A funding. I do not see how the desired condition as described in the Forest Plan could be maintained for these management areas. Please develop an alternative which places trails outside of these roadless areas and management areas to maintain the values and characteristics as originally intended.

Sustainable Trails System

When developing trails systems it is important to consider the ability of the managing unit to manage the trails and users within the desired condition of the management area. Forest and District recreation

budgets historically fluctuate and have aspects which are unpredictable and are often spread thin between units for maintenance and management of recreation facilities. At present, there is no pay-to-play funding mechanism for mountain biking. Users pay no licensing fee or special tax for the maintenance of facilities. Partnerships for the maintenance of such facilities is unpredictable and not dependable. While the City of Steamboat Springs repeatedly states that the voters voted 2A in to build trails and draw mountain bikers to the area to boost the economy, they also say they have no plan for the maintenance or management of these facilities. Please develop an alternative which puts forth only trails that can be reasonably managed within the district allocated budget.

Summary

In summary, the proposed Mad Rabbit Trails System is timely and important to put forth for public consideration, comment, and process participation. The proposed action is extensive and intensive by nature of the user and requires the highest level of environmental analysis with extensive public participation. As proposed, by either alternative in this proposal, these facilities effectively extend the city onto the national forest.

This proposed action is a **connected action** to other projects funded by the 2A initiative and needs proper comprehensive analysis to consider all actions on all lands with the intent to create intensive mountain biking trails systems. **Only then will the cumulative effects to the human and wild environment be considered as a whole, allowing for the development and management of sustainable recreation experiences for all users, and conservation of the very values and characteristics of the wildlands recreationists seek to experience.**

The development of additional alternative(s) to adequately display the trade-offs between the intensive development of the proposed action and lesser options, which consider the natural environment and other uses is imperative.

Thank you for the opportunity to comment and participate in this important project.

/s/ Kimberley Vogel

Kimberley Vogel
Natural Resources Consulting
970-819-2281