

To: USFS Mad Rabbit Trails Project

Cc: Medicine Bow-Routt Forest District Ranger Michael Woodbridge
Forest Supervisor Russ Bacon
Colorado Parks & Wildlife Commission

Dear Sirs and Madams,

Our organizations represent tens of thousands of conservationists who care deeply about long-term fish and wildlife conservation and backcountry habitats in Colorado. We are writing in unified opposition to the draft Mad Rabbit Trails Project proposal, dated October 24, 2022, in Routt National Forest east of Steamboat Springs.

The draft Mad Rabbit Trails Project comprises 52 miles of non-motorized and motorized trails near Rabbit Ears Pass, with many of the trails located in the Long Park Roadless Area. We believe that going forward with the project as described would be harmful to local wildlife, the Long Park Roadless Area, and would violate NEPA and Colorado Roadless Area processes. The Mad Rabbit Trails Project is situated in the habitat of the E-2 Bear's Ear elk herd, the second largest elk herd in Colorado, making it the second largest in the world. The proposal represents a serious threat to the long-term prospects of this elk herd, other wildlife that is sensitive to human disturbance, and the undeveloped characteristics of the Long Park Roadless Area.

In 2001, the U.S. Forest Service adopted the Roadless Area Conservation Rule to protect the critical and incomparable value of about 58 million acres of unroaded National Forest lands from road construction and logging, except in a narrow set of circumstances. The agency adopted the state-specific Colorado Roadless Rule embodying many of the same protections in 2012 for about 4.2 million acres in Colorado. These rules recognize that roadless forests provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research. We are therefore deeply concerned that the Mad Rabbit Trails Project, as proposed, fails to protect these values and does not demonstrate appropriate regard for the importance, fragility, and need for protective stewardship of roadless forest.

Evaluation and process deficiencies:

- The USFS has declined to perform the much-needed EIS (Environmental Impact Statement) for a proper programmatic review and cumulative impact analysis for the area, stating it is relying on the 1998 Forest Plan instead. That plan is woefully out of date, and none of the trails included at Buffalo Pass or Mad Rabbit are mentioned in the 1998 plan.
- The Mad Rabbit Trails Project is described in Forest Service external and internal documents as the second phase of a comprehensive trails system, following the earlier Buffalo Pass Trails Project. Splitting up a single project into phases to be evaluated on a piece-meal basis violates NEPA processes and is designed to circumvent preparation of a full EIS containing a programmatic NEPA evaluation and proper cumulative analysis.
- The project is part of an overall trails proposal explicitly designed to attract 180,000 incremental summer visitors to the Steamboat area, each staying on average over 4 nights. Many of the planned trails are in a Colorado Roadless Area. Prorating for the portion of the project represented by the Mad Rabbit Trails Project adds over 1,700 summer visitors per day, increasing the density of users on the entire trail network. The Colorado Roadless Rule is clear: “Proposed actions that would significantly alter the undeveloped character of a Colorado Roadless Area require an Environmental Impact Statement (EIS).” An EIS is warranted here.
- Analysis of the predicted incremental visitor numbers, along with actual trail counter data from nearby Buffalo Pass trails, indicates that Mad Rabbit trails will exceed semi-primitive recreation volume densities articulated as a roadless characteristic in the Colorado Roadless Rule. Solitude is explicitly listed as a roadless characteristic for the Long Park Roadless Area and this project would significantly impact that characteristic. The Forest Service has failed to perform a traffic analysis for the trails in question.
- The Forest Service only minimally evaluated less impactful alternatives, including placing trails on other already developed public lands or moving the trails outside of species calving areas and summer range, or to the south of US 40. All of these alternatives were brought to the US Forest Service’s attention. Not considering these alternatives further is counter to NEPA practices and counter to Colorado’s “Planning Trails with Wildlife in Mind.”
- The Forest Service proposes to brush in 36 miles of illegally created trails to compensate to a significant degree for impacts associated with the new trail building. This is inappropriate for several reasons. First, the Forest Service has allowed unsanctioned trails to persist on forest lands in derogation of its administrative duties. Stepping up to do its job now should not be credited as “mitigation” for yet additional impacts of new trails construction. Second, it is arbitrary to make an equivalence between closing of undocumented trails with rare usage on one hand, and minimization of impacts from trails proposed for

high-volume tourism on the other. This is not backed up by any research included in the EA; human disturbance to wildlife is dependent on the frequency and type of activity, not purely the length of a trail. The Forest Service has not performed any traffic analysis on either the trails proposed to be decommissioned, or on the newly proposed trails. Third, using the removal of illegally created trails as a mitigation allowing for new trails to be built creates perverse incentives for the unauthorized trail builders. Fourth, the use of illegally created trails is notoriously difficult to stop once members of the public develop a sense of entitlement to use them. Even fencing or placing boulders to block trails has been ineffective in the Medicine Bow-Routt National Forest. There is no guarantee that 'brushing in' the trails will be effective.

Elk Concerns:

- There is a worrisome decline in the health of the local elk population and their reproductive success. Elk are migratory animals who need large, connected landscapes of healthy habitat to thrive. Their protection can serve as surrogate for many other species who share the same habitat, such as dusky and ruffed grouse, mule deer, pronghorn, goshawks, and other raptors.
- The proposal specifies the development of new mountain bike trails in elk calving areas and elk summer concentration areas. Scientific [peer-reviewed studies](#) have shown trail-based recreation can cause disturbance to elk up to 1500 meters away, leading to habitat loss, compression, and fragmentation.
- There are 21 miles of proposed Mad Rabbit trails in acknowledged elk calving areas that will have no seasonal closures at all. Peer reviewed [research](#) has shown a 5% probability of mortality of an elk calf each time it is disturbed, which can occur as far as 1500 meters away from mountain biking activity. Not placing seasonal restrictions on elk production areas explicitly violates Colorado's "Planning Trails with Wildlife in Mind."
- The previous development of the nearby Buffalo Pass Trails Project was followed by a reduction in number of observed elk in the area, effectively leading to habitat loss for the E2 herd. These observations coincide with the CPW-reported trends in GMU 14 of declining calf/cow ratios and total numbers of elk classified. As calf/cow ratios decline fewer elk are recruited into the population leading to further population declines.
- The area in question has already seen deleterious impacts from previous recreation development in the area. There is a declining trend in both the number of elk classified during the annual winter classification flights and the observed calf/cow ratio. These metrics show the precarious situation of the local elk herd.

- The dense set of proposed trails near US40 in the area known as Ferndale results in over 3 linear miles of trails per square mile of elk habitat, violating the 1 linear mile of trail per square mile of habitat metric specified in Colorado's "Planning Trails with Wildlife in Mind."
- The Forest Service justifies many of the trails in elk habitat by being within one mile of US40, saying much of that area is already disturbed. There is no evidence presented in the EA of this large buffer to open roads, and the studies referenced in the EA as justification *never* examined open roads. [Actual research](#) on disturbance due to open roads show disturbance bands ranging from ¼ mile to ½ mile.
- The Forest Service justifies this project as meeting their 1998 Forest Plan by using an obsolete 1983 Elk Habitat Effectiveness model that specifically excludes any impact from recreational trails. Modern research has shown this old model to be unreliable even for open roads and irrelevant for recreational trails. Modern models rely on spatial analyses that the US Forest Service has refused to perform, though using the most up-to-date science is specified in NEPA guidance.

Questionable Purpose and Need:

- A [2017 Ride Center Report from IMBA](#) (International Mountain Bike Association) examined and assessed Steamboat Springs mountain bike trails. Steamboat Springs is designated as a Silver Medal IMBA Ride Center in the report. This in itself is quite an achievement and indicates the current set of trails and services in the area are very good. IMBA identified eight specific needs where Steamboat Springs could improve. Notably, Mad Rabbit trails did not satisfy a single need identified by IMBA.
- The Steamboat Chamber of Commerce [publicizes](#) "Steamboat is one of America's premier mountain biking meccas with more than 500 miles of singletrack bike trails that wander through meadows flecked with wildflowers and twist around aspen groves." With such a large existing local trails network, there is not an urgent need to develop trails in currently undeveloped areas of Routt National Forest. There are other alternatives on public lands that are less impactful to wildlife.

Social and economic issues:

- Wildlife watching and big game hunting together bring in over \$3B of economic activity to Colorado each year. Both activities will be negatively impacted by the proposed trail system. Due in part from previous recreational trails in the area,

elk hunting in GMU14 has recently been limited in face of declining population numbers and calf/cow ratios.

- Due to many of the above issues, community opinion in Steamboat Springs and Routt County has shifted decidedly against this project. A recent survey of Routt County residents showed overwhelming support for a balanced approach to recreation and conservation (>70%). The least chosen option (“recreation is more Important than conservation”) gathered only 3% of the respondents.

This is an ill-conceived project that presents severe impact to local wildlife and species habitat in an area already subject to intense recreation pressures. The USFS must reject the pressure to create more trails in sensitive habitats for motorized and nonmotorized use and diligently close in unauthorized trails. At the very minimum, the Forest Service should prepare an Environmental Impact Statement that includes the entire region from Mount Zirkel Wilderness to Sarvis Creek Wilderness areas to appraise the cumulative impacts of all recent projects in the region. This would include the previously constructed trails in the Buffalo Pass area, recent ski area expansion, and proposed road improvement projects.

Without this ‘hard look’ at cumulative impacts, the project should be halted.

Sincerely,

Colorado Sierra Club
Friends of the Routt Backcountry
Great Old Broads for Wilderness
Quiet Use Coalition
Rocky Mountain Wild