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Brendan Kelly, Hahns Peak Bears Ears Project Lead  
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To Brendan Kelly and all others it may concern,

Routt County Riders has played an active role in the decade-plus genesis of the Mad Rabbit trails project, and we continue to be fully invested in the next phase of its completion. We are pleased to provide the overall feedback that the latest draft EA and resulting proposed trails plan meets both the purpose and need of the original proposal while also diligently protecting the natural resources of each zone considered. We are, overall, satisfied with the compromise that we see in this iteration between balancing the growing need for expanded recreational opportunities and the desire to conserve large, unscathed tracts of Roadless Areas and important wildlife usage corridors.

Overall, our emphasis is on the positive, and includes:

- We appreciate the attention paid to progressive trail design, allowing for potential directionality and user-specificity while also keeping opportunities in place for a VERY wide range of user groups - cyclists, hikers, equestrians, adaptive users, e-bikes on motorized routes, etc. This is NOT just a mountain bike network.
- We fully support the inclusion of seasonal wildlife/elk calving closures in this zone and are confident in the amount of input and participation that Colorado Parks and Wildlife has had with the USFS and their own biologists/specialists throughout the process to minimize impacts to wildlife.
- We are happy to see that most trailheads and access points along Highway 40 on Rabbit Ears will provide future summer connectivity to the trail system, better leveraging this historically under-utilized corridor in the summer months.
- We celebrate the continued focus on the Ferndale Trailhead vicinity and the attention paid to that nexus which will act as a linchpin to all the connected and loop route possibilities in the area, including connections from Dumont all the way across.

When it comes to constructive feedback and proposed changes to the overall plan, our main points include:

- We appreciate the CDT alternate route from Dumont to Summit Lake, but are concerned at the lack of a singletrack connection from Upper Flash of Gold to the Divide route. RCR would like to see that connector included in future development - there are several possibilities for how this could be done. RCR would be happy to continue consulting with the USFS on potential alignments.
- We believe that the short connector trail between the Divide and Mountain View on the south side of Long Lake should be removed from the list of non-system trails to be closed and included/inventoried as a system trail. From the perspective of protecting streams in the area, two potential solutions exist - one is to reroute the connector further south on the Divide and cutting left/west prior to the drainage itself and thus avoiding the stream twice, or constructing 1-2 wooden bridges over the creek at the alignment that currently exists. RCR is willing to flexibly work with the USFS to plan for this.

And our feedback regarding the Mad Creek zone is as follows:

Historic bike use of the area between the Elk Park Road and Mad Creek has existed since at least the early 1980's, when local cyclists used game trails to explore. Early trail markers, in the form of star-shaped blazes on aspen trees, are

still visible on the non-system "MRP" (Mad Rocky Peak) trail. This zone saw a significant increase in use through the 1990's with the rise in popularity of mountain biking - and the lack of a well-developed local trail network. Bikers were looking for a challenging, primitive experience in a remote setting. The MRP trail provides this experience, while also connecting the Elk Park Road with Mad Creek to enable lengthy (20+ mile) looped options. We at RCR value the historic use and unique experience MRP provides. The improvement of the trail network on Buffalo Pass, Emerald Mountain, and Steamboat Resort has resulted in reduced use of this trail zone by cyclists, but it still provides a unique experience for those seeking a remote, challenging adventure. We are concerned that the proposed complete closure of the non-system trails in this area will eliminate a connection between the Elk Park Road and Mad Creek, which will eliminate the opportunity for a looped ride. Eliminating this connection will significantly reduce the quality of experience cyclists can have in this area. We understand the resource-based concerns with the routing of MRP and appreciate the tremendous amount of work the USFS has put into this overall trail proposal, but we would ask that the USFS consider some alternate options for the MRP zone.

One option would be to entirely systematize MRP trail and reconfigure it as required for resource protection. Understanding that there have been concerns about fragmentation of this zone for wildlife, another option would be to take a "no action" plan for the area until an opportunity to consider and discuss alternative plans comes about. A final option would be to eschew MRP in favor of constructing a connector from Elk Park Road to Mad Creek Trail outside the wilderness boundary to create a secondary loop option. Some version of this trail was previously included in the Trails Alliance proposal and was eliminated. This valuable connector is worth a second look. Creation of this connector would then allow for closure of the non-system trails while maintaining connectivity and the opportunity for a challenging and remote experience. Regardless of the action chosen in the Mad Creek zone, we do not advocate for additional trailheads or increased parking amenities. We believe this area should remain primitive and remote - an area to be accessed by only the hardest adventurers looking for this type of experience.

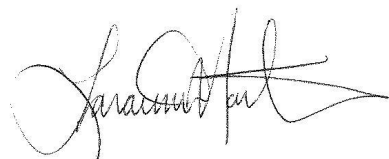
RCR has worked hard over the past handful of years to continue improving and building a strong relationship with the local USFS ranger district staff and providing valuable volunteer maintenance and stewardship opportunities to the public. We are happy to see this project continue to move forward to benefit the local community and provide a crucial new zone of trail development on Rabbit Ears Pass, historically quite underutilized for its proximity to the highway. This will increase ease of access for both the local Routt County community AND for numerous tourists and visitors traveling along this heavily trafficked corridor, relieving pressure from other local trail zones such as Dry Lake and Emerald Mountain. More people will be able to more easily access transformative outdoor recreation experiences and the beauty of our local forests. For this, and for all other reasons mentioned above, we give our wholehearted support to the USFS to continue this valuable work and look forward to its progress.

Sincerely,



Craig Frithsen

President, RCR Board of Directors



Laraine Martin

Executive Director, Routt County Riders