Issue 1. Law Enforcement – Monitoring and Patrolling (Standing: Bahr; Corvo et al; Blakely; Wagner; Spiro, et al):

The EA disregards concerns about law enforcement and the policing of the trail system. The existing cooperative agreement with the local Boulder County Sheriff’s Office has been insufficient to control illegal activity. Additionally, it is not the public’s responsibility nor is it safe for the public to patrol and monitor the new facilities as suggested in the EA. If there is not funding to monitor and enforce regulations currently, it is unwise to introduce still more activities and trail work that will require more monitoring and regulation. New trails or trailheads should not be constructed until sufficient law enforcement is available. Building new trailheads and improving existing trailheads without sufficient policing will likely result in a corresponding increase in illegal activity. There is no evidence that the new trail system improves the Forest Service’s ability to enforce regulations as evidenced by the recent proliferation of social trails, illegal motorized use, transient living, and sport shooting infractions.

Objection Response: The project as proposed reduces the number of miles of existing system and social trails from approximately 62 mi to 44 mi, provides for increased signage, bicycle and equestrian use would be restricted to existing system trails, motorized use would continue to be restricted, and winter motorized use would be eliminated (EA pg. 28-29). These actions are expected to improve the Forest Service’s ability to manage the trails and enforce regulations in the area, while also reducing the unmanaged recreational use currently occurring in the area (EA pgs. 41 & 42).

Partner groups would not be enforcing regulations, but would instead provide support to the management of the area with both funding and public educational efforts. Enforcement would remain the responsibility of the Forest Service and local law enforcement. However, partner groups would provide a valuable service in reporting enforcement and maintenance needs to the Forest Service and law enforcement which is expected to improve compliance. These partnership groups and volunteers would supplement Forest Service educational presence along with the additional county law enforcement support currently occurring. The significant engagement by local partnership groups and volunteers to implement the proposed action has been recognized throughout the planning process and is anticipated to remain significant throughout any approved implementation activities (EA pgs. 40-42).

Forest Service budgets can be variable from year to year, which is why the Forest Service pursues partnership support. Partners develop ownership when they work on a trail and we expect more compliance from users due to partnership support. It is the intention of the Forest Service to utilize its own funding sources as well as other funding sources to both construct and maintain the trail system (EA pgs. 108 & 111).

Issue 2.A. Law Enforcement – Transients, Camping, Trash (Standing: Whitney; T. Blakey; Kram, Schick, Farley; Maude; Long; Pfeffer; McCarthy; Boswell Spiro, et al):

There is currently no ability to provide enforcement which has resulted in proliferation of social trails, illegal motorcycle use, transients living in woods, and sport shooting infractions. In the EA it states “These issues are concerns of the Forest Service and other local governments, but these issues are being addressed through other efforts with multiple constituencies.” These issues
should be addressed and integrated into the project. The most important use of funds could be providing West Magnolia a formal campground with restroom facilities and enforcement to stop squatters and illegal campfires. Project fails to address seasonal transient population on USFS land or need for additional law enforcement. Object to toilets or parking areas until solution to transient/homeless/long term camping issues are solved. Public is afraid to recreate at West Magnolia anymore. To suggest that more trail users will help get rid of long term campers and make the area safer is ridiculous.

**Objection Response:** The scope of this project was focused on the trail system and components of recreational use associated with the trail system. While the Forest recognized there are other issues and needs in the area the proposal meets the purpose and need by proactively protecting natural resources while providing a quality recreation experience and enhancing visitor safety. During the 2015 comment period this issue was raised and considered by the Forest Service, and it was determined to be outside the scope of this project (EA pg. 13).

**Issue 2.B. Law Enforcement – Transients, Camping, Trash** (Standing: Whitney; T. Blakey; Kram, Schick, Farley; Maude; Long; Pfeffer; McCarthy; Boswell Spiro, et al):

The biggest issue is the lack of enforcement of USFS rules and insufficient funding for the current level of use. Local residents systematically observe and report illegal behavior yet it often cannot be addressed by the USFS for unreasonably long periods of time due to lack of resources appropriated for law enforcement. How will the USFS police vastly increased numbers of projected users of the East Magnolia trail system and prevent it from becoming a vagrant wasteland like West Magnolia. Without funding in place for more law enforcement within the plan’s area it should not go forward. The initial funding will be wasted because the USFS will not maintain the trail system or police the multitude of new users.

**Objection Response:** The project as proposed reduces the number of miles of existing trails from approximately 62 miles to 44 miles, provides for increased signage, bicycle and equestrian use would be restricted to existing system trails, motorized use would continue to be restricted, and winter motorized use would be eliminated (EA pg. 28-29). These actions are expected to improve the Forest Service’s ability to manage the trails and enforce regulations in the area, while also reducing the unmanaged recreational use currently occurring in the area (EA pgs. 41 & 42). Partner groups would provide a valuable service in reporting enforcement and maintenance needs to the Forest Service and law enforcement which is expected to improve compliance. These partnership groups and volunteers would supplement Forest Service educational presence along with the additional county law enforcement support currently occurring. The significant engagement by local partnership groups and volunteers to implement the proposed action has been recognized throughout the planning process and is anticipated to remain significant throughout any approved implementation activities (EA pgs. 40-42).

Forest Service budgets can be variable from year to year, which is why the Forest Service pursues partnership support. Partners develop ownership when they work on a trail and we expect more compliance from users due to partnership support. It is the intention of the Forest Service to utilize its own funding sources as well as other funding sources to both construct and maintain the trail system (EA pgs. 108 & 111).

Dispersed camping, recreational target shooting, and unauthorized occupancy on lands within the project area are all activities that fall outside the scope of this planning effort.
Those activities on their own accord have been identified as a Forest Service concern and are being actively addressed by other Forest planning efforts.

**Issue 3. Nederland** (Standing: Whitney, Farley, Kram):

There has been mention of 4’ wide trails at access points and 2-3’ wide trails throughout the system. This essentially dumbs down the system and does not lend itself to the experience Nederland trials currently provide. Such changes would undermine the unique, special, and community-defining experiences the trails currently offer. Trails 16-24” in width should be the standard throughout the system. Nederland residents prefer hand built trails and discourage any use of trail building machines to expedite the execution of the project. The proposal doesn’t mention who will complete the work. Will machines be used to build new trails or will it be the way it has been done for years – volunteers working by hand? The existing trail system provides a unique experience for hikers, runners, mountain bikers, and equestrians and does not need major modification at the expense of more important issues like enforcement of USFS rules that protect against user-ignited forest fires and other calamities. Adding signs, picnic tables, larger parking lots, bathrooms, kiosks, and hitching posts will irrevocably change the rural and wild character of the area.

**Objection Response:** Regardless of how the trail would be constructed, the objective of the trail system is to maintain the natural character of the existing system within Forest Service design standards. The width of the trail system has been clarified in Alternative B. The trail system would be designed for optimized use, taking into account the type of non-motorized users for the trail. For instance some trails that would be suited for horses would require a wider width. Therefore, trail width would range between 1 and 4 feet. (On average, the trails are expected to be between 1’ and 2’. The widest width of 4’ would be collector points adjoining trailheads. Some places due to resource issues or safety concerns may require a wider trail width (e.g., trail structures, turning widths, or grade) (EA pg. 17). Signs are a necessary component of trail management. They provide the user with information that would allow them to make an informed choice (EA pg. 18). Ancillary recreation activities, facilities, clearings (trail pullouts, passing lanes, overlooks, picnic clearing, hardened stream fords for horses, hitching posts, etc.) would be considered on a trail-by-trail basis (EA pg. 17). The draft decision notice (Draft DN) also states “Pursue a collaborative approach to trail layout, utilizing input from user groups, landowners, and other agencies” (Draft DN, pg. 16; EA pg. 24). This will facilitate local and user input during the implementation of the project. The Draft DN also states that toilet facilities “may” be provided at two existing trailheads and horse trailer parking “may” be provided at one trailhead, therefore there is also a chance that they “may not” be provided (Draft DN pg. 10; EA pg. 21). Considering the collaborative approach taken by the Forest and the Responsible Official for the project it stands to reason that any facilities improvement or expansion would follow the same approach.

**Issue 4. Keep Social Trails** (Standing: Whitney, Horvath):

Why are social and user-created trails a bad thing and deemed unsustainable as they have been maintained and constructed by volunteers for years? The addition of trails and not taking away of existing trails will keep the Magnolia trail system unique. Social trails are the key to the trail experience therefore keep the town connecting trail system in place. The trails on the east side of the highway are slated for destruction even though they have been in use for decades.

**Objection Response:** The project purpose and need states this action is needed to create a sustainable and manageable non-motorized trail system within the Magnolia area for all
non-motorized uses. As stated on page 54 of the EA, Management experience reveals that social trails are frequently poorly designed with steep grades and as such are rarely sustainable under increased use with subsequent resource degradation often being severe. Social trails make up approximately 74% of the existing trail system and this is probably a conservative estimate based on incomplete mapping and on-going expansion of the social trail network. The desired condition is to have a well-functioning trail system that the recreating public uses and enjoys, and that minimizes impacts to other resources in the area. This can best be attained by creating new trails, closing system and social trails and converting some roads and social trails to official classified trails. (EA Pg. 49, 52)

Existing social trails that will be included in the official trail system may need realignment or other improvements to make a sustainable trail under Forest Service trail standards indicated by trail class to prevent further recreation use and resource damage (EA Pg. 18). An effective trail and trailhead system minimizes the impacts associated with the creation of social trails and ad hoc parking areas, improves sanitation, reduces soil compaction, reduces erosion and sedimentation of sensitive waterways, minimizes impacts to cultural values and sensitive wildlife habitat, enhances the recreation user experience, provides a safer recreation experience for users of the system who are less likely to get lost by providing adequate signing along the trail system and information at trailheads, minimizes conflict between the various non-motorized users, and provides community access points to the trail system (EA pg. 2, 3). As determined in both Alternatives’ effects analysis, the existing system and social trails and roads are likely impacting mule deer movement and use of forage in the project area. Ongoing proliferation of user-created trails are likely to cause additional impacts to elk and mule deer (EA pg. 69, 70).

**Issue 5. Partnerships and Lack of Forest Service Funding** (Standing: McCarthy T. Blakey, Short, Farley, Kram, Maude, Jones, Spiro et al):

As the EA states the USFS doesn’t have funds or personnel to implement and or maintain this proposal and therefore the use of partners and volunteers will be needed indicating the USFS is “biting off more than they can chew”. There is not a back-up plan if the partners and volunteers commitments dwindle. Partners and volunteers cannot replace law enforcement, and in addition these partners and volunteers may have differing opinions than the Forest Service. The USFS has dismissed resident input and concerns but Boulder Mt. Bike Alliance (Bcba) has had strong influence and funding involved creating a “conflict of interest” hence it gives Bcba power over the plan implementation with regard to design and maintenance of the proposed trail system. Parties with special interests and associated potential for power for the project is unethical and unacceptable and therefore this reliance should be “severed from the plan”.

**Objection Response:** Forest Service budgets can be variable from year to year, which is why the Forest Service pursues partnership support. Partners develop ownership when they work on a trail and we expect more compliance from users due to partnership support. It is the intention of the Forest Service to utilize its own funding sources as well as other funding sources to both construct and maintain the trail system (EA pgs. 108 & 111).

Partner groups provide a valuable service in reporting enforcement and maintenance needs to the Forest Service and law enforcement which is expected to improve compliance. These partnership groups and volunteers supplement Forest Service educational presence along with the additional county law enforcement support currently occurring. The significant engagement by local partnership groups and volunteers to
implement the proposed action has been recognized throughout the planning process and is anticipated to remain significant throughout any approved implementation activities (EA pgs. 40-42).

The Forest Service began involving the public in 2012. The Forest Service held two comment periods and received over 600 comment letters with well over 1000 comments. These commenters lived in Nederland, Rollinsville, other mountain communities, Boulder, and other Front Range Cities. No one community or recreation user type was favored for this non-motorized trail system proposal.

**Issue 6. Purpose and Need** (Standing: Corvo et al, Jones):

The Forest Service has not demonstrated the need for this project. In addition, the purpose of the project is not valid due to the strong public demand for multiple use (including motorized use) on the Boulder Ranger District, and because the project seems to be based on closing multiple use areas for the benefit of smaller user groups.

**Objection Response:** The need for the project has been articulated and demonstrated multiple times from its inception in 2012 through the latest documentation in the EA and Draft Decision Notice. The project is needed: 1) to comply with Forest Plan direction to provide outdoor recreation opportunities while reducing resource impacts; and 2) because of the environmental changes that occurred to a portion of the project area as a result of the 2012/2013 fuels reduction project and that will potentially occur as a result of a future fuels reduction project. (See pages 2-4 of the EA for a more detailed explanation of the need for the project.)

As stated on page 15 of the EA, the intent of the proposed action is to maintain multiple use access across all trails, while some trails within the project area may be optimized for specific user groups. While the multiple uses accommodated on the trails in the project area do not include motorized use, this does not constitute a change from current conditions as this area has been limited to non-motorized trail use since at least 1997 according to the Forest Plan Summer Travel Strategy Map that identifies this area for “No Motorized Trail; Opportunities Exist; No Increase Expected.” Public input reflects that mountain biking is the primary recreation use on the existing trails within the project area. This is consistent with input gathered previously through the 2003 Caribou-West Magnolia EA, which also identifies the West Magnolia trail system as the recommended location on the District for mountain biking. The proposed action does largely maintain motorized recreation opportunity in the project area. While motorized recreation opportunities may be limited in this project area, within the Boulder Ranger District there are 205 miles of roads that provide for this use.

**Issue 7. Recreational Sport Shooting** (Standing: Moll):

Target shooting opportunities are limited, and the priority in this area should focus on where the need is greatest. Starting in 2012/2013, most available target shooting opportunities were closed and have not been re-opened. As there are hundreds of miles of trails available there is no need for a sense of urgency for this project right now.

**Objection Response:** The Forest is aware of this concern and is addressing the issue through other planning efforts with multiple constituencies. The purpose of this project is to address issues related to a trail system that has experienced a substantial increase in recreation use, including unauthorized trail construction (also known as non-system or social trails). This use has led to resource damage, trail damage and unmanaged
recreation use in the project area. Considering the scope of the project as stated in the purpose and need section of the EA (pgs. 2-4 of the EA) recreational sport shooting is outside the scope of the project as it was proposed.


While the idea of adaptive management seems very beneficial for a timely response to activities or events there are no limits put on what it encompasses. In the future this could lead to changes and actions with unintended approval from the public.

"Forest Service recreation crews and Forest Service partners either during routine maintenance or recreational use of the trails will inspect the condition of the trail system for safety and resource concerns. Inspections will be recorded on Forest Service provided inspection sheets and turned into the Forest Service for any necessary action." (Draft Decision Notice) Given that Forest Service partners or volunteers are likely not as well trained as Forest Service officials, especially in the area of wildlife biology and other resource concerns, the Forest Service cannot rely exclusively on inspection sheets for accurate information, and must verify firsthand the information reported in them.

**Objection Response:** Adaptive management is addressed in the Magnolia Trails Project EA in the section titled “Adaptive Management for System Trails”, and states, “For any trail system adjustments, Forest Service resource specialists would be consulted for design, layout, and implementation” (EA, pg.19). As to the assertion that the Forest Service cannot rely on inspection sheets submitted by partners and must verify the information, this is likely true. The EA, in the Adaptive Management Actions subsection (pg.20), states that Forest Service specialists and program managers would be involved in any actions taken. It states; “Forest Service Specialists/Program Managers: Monitor during and after implementation for design criteria implementation and effectiveness and to determine if triggers indicate adaptive management actions need to be taken (EA, pg.21).

Potential impacts to wildlife are addressed in the sub-section “Monitoring of Trail System”. A bulleted item (EA, pg.21) states ”Monitoring elk movement by Forest Service wildlife biologist in conjunction with monitoring by Colorado Parks and Wildlife and others to determine if adaptive management is needed to protect the elk migration corridor and/or winter range.

Adaptive management pertaining to the Magnolia Trails project is constrained by the triggers and potential solutions detailed in the EA. Specific triggers are listed by category, followed by a set of Adaptive Management Actions which could be employed to address issues in each category. In the Adaptive Management section of the EA (pg 20), it does state that there could be public involvement.

**Issue 9. Use Conflicts** (Standing: Farely, Kram, Schick):

Creating trails ideal for mountain bikers is in direct conflict with multi-use opportunities for all recreating publics on public land. Presently, all recreation users are evenly divided and with the addition of “thousands of mountain bikers” to this trail system, conflicts will arise. We do not want a trail system dominated by “high speed bikers”. We feel the primary proponent for this project and the associated source of funds for this project are unfairly slanting the project towards the mountain biking community.

**Objection Response:** The project purpose and need states this action is needed to create a sustainable and manageable non-motorized trail system within the Magnolia area for all
non-motorized uses. The desired condition is to have a well-functioning trail system that the recreating public uses and enjoys and that minimizes impacts to other resources in the area. Appendix C: Comment Response p. 110 states that the intent of the proposed action is to maintain multi-use access across all trails, while some trails within the project area may be optimized for specific user groups. The Improved Non-motorized Trail System section of Alternative B confirms that considerable effort was put forth during the public input process and this can be recognized within the proposed action as a result. As stated on page 15, public input reflects that mountain biking is the primary use on the existing trails within the project area. Major components consist of allowing for better opportunities with bordering land agencies, and reflecting public desire for a variety of trail character and challenge, with intermediate and advanced trails being the most desirable. However the EA repeatedly states that mountain biking is not the only recreation use occurring on this trail system.

**Issue 10. Increased User Impacts** (Standing: Blakey, Long, Spiro, Homsher(s), Hankal):

The USFS is taking a proactive stance with the development of a sustainable trails system for increasing forest visitors but has not evaluated the possible effects of increased use in the project area. The plan calls for widening of trails, clearing, the addition of facilities, and an official route map which will allow more accessibility to more users therefore have a direct effect on the environment as well the wildlife. Failure to study these affects needs to be completed for a “true environmental assessment”. Additionally, the effects of an increase of forest visitors on fewer trails need to be adequately addressed.

**Objection Response:** The project desired condition is to have a well-functioning trail system that the recreating public uses and enjoys and that minimizes impacts to other resources in the area (EA. Pg.3). The existing condition is addressed in the no action alternative and utilizes a cumulative effects analysis with each resource section regarding the effects on the environment which results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future action's (EA, pg. 32). Recent trends assessed with field observations suggest that as the front-range population increases, demand for recreational trail opportunities would increase and there would be an increase in conflict among recreation users. If unmanaged recreation use in the project area is not addressed, it can be expected that resource damage and unmet recreational needs would perpetuate (EA, pg. 37). Proposing a sustainable trail system with an adaptive management system in place will allow a more immediate management action and will allow the proposed project area to become more resilient to future recreation growth, respond to changes in the physical landscape or social dynamics within the project area over time. (EA, Pg.42)


The plan to increase the parking lot size and traffic into the Front Range trailhead is dangerous given the location of the entrance is on a blind spot on Magnolia Road. By increasing the number of parking spaces and adding the other amenities, you guarantee that usage will increase which will inevitably lead to vehicular accidents. East Magnolia only started to become popular while West Magnolia was closed for the clear cutting project, it’s now back to very few trail users. Providing toilets will increase problems with transients. How will the toilets be accessed for servicing during the winter months, especially at Front Range where the access is not plowed? If it is closed will sanitation issues increase?
**Objection Response:** Magnolia Road is a county road and under the county’s jurisdiction. The county would therefore respond to any traffic issues that may arise. Increasing the size of existing parking and the addition of restroom facilities were incorporated into the proposed action in response to issues brought up during the scoping period (EA pg. 11). Implementation of the project would largely depend on partnership/volunteer group involvement and the implementation strategy would include an initial public meeting followed by partnership meetings as necessary (EA pg. 21-22). This will facilitate local and user input during the implementation of the project. The Draft Decision also states that toilet facilities “may” be provided at two existing trailheads, therefore there is also a chance that they “may not” be provided (Draft DN pg. 10; EA pg. 21).

Dispersed camping, recreational target shooting, and unauthorized occupancy on lands within the project area are all activities that fall outside the scope of this planning effort. Those activities on their own accord have been identified as a Forest Service concern and are being actively addressed by other Forest planning efforts.

**Issue 12. Winter Use** (Standing: Long et. al):

The proposal indicates that the winter trail system will utilize a grooming machine to create these trails for skate skiing although the ski area, Eldora, currently has a cross country skiing opportunities. Why does the West Magnolia area need a machine developed trail system when traditionally this area lends itself to cross country skiing opportunities without a machine developed trail system? How will the addition of a machine developed trail system affect the Eldora ski area?

**Objection Response:** A purpose of this project is to create a sustainable and manageable non-motorized trail system within the Magnolia area (EA, Pg. 3). During the public scoping/comment period in 2013, many commenters identified this winter groomed trail system as a desirable component of the plan. (2013 comment period analysis and EA, appendix C, Pg. 110). This machine developed winter trail system will address increasing winter recreation use by providing a groomed non-motorized trail system for on-snow/winter use and will minimize impacts to wildlife and their habitat (EA, Pg. 3,4).

During all public scoping/commenting opportunities the Eldora Ski Area did not express any concern for the proposed action regarding the grooming of the proposed winter grooming trail system therefore the Forest Service does not expect any impacts to the Eldora Ski Area. In addition, the geographic barriers between Eldora Ski Area and the proposed winter grooming trail system does not provide a connection to one another (EA, Map #6, pg. 97).

**Issue 13. Forest Service Accountability** (Standing: Blakey, Spiro et al):

The Draft Decision Notice states that the Forest Service will pursue a collaborative approach to trail layout, utilizing input from user groups, landowners and other agencies. The Forest Service has a poor history of taking public input into account unless legally bound to do so, so the agency must be held accountable for complying with this statement.

**Objection Response:** The Forest Service must legally comply with the final decision made for this project (40 CFR 1505.3). By including this statement in the decision, the Forest Service is legally bound to pursue a collaborative approach as described. “Involvement in the implementation strategy will include an initial public meeting followed by partnership meetings as necessary” (Draft Decision pg. 13). The Draft Decision Notice also states that this design element is necessary to ensure that
implementation of the selected alternative complies with laws, policies and the *Forest Plan* (Draft Decision Notice, page 10).

**Issue 14.A. Adjoining Community Sentiment** (Standing: Long, et al):

The EA decision states that the effects on the quality of the human environment are not likely to be highly controversial; however, opposition from locals residing in the adjoining community should be given more consideration.

*Objection Response:* The Forest Service did take into account comments and input from individuals residing in or near the project area, and purposefully conducted multiple comment periods and various forms of public outreach to ensure that local voices were involved and heard. The Forest Service received over 600 comment letters from individuals or groups living in Nederland, Rollinsville, other mountain communities, Boulder, and other Front Range cities. Comments from one community or recreation user type were not favored over comments from another community or user type. As stated in the EA on page 88, item 4, controversy refers to opposing scientific opinions, not public opposition to a project. The actions planned as part of this project are commonly implemented types of activities and thus not controversial in the scientific sense.


The Forest Service needs to clarify how it will “work towards obtaining legal public access” on trails that cross private lands.

*Objection Response:* As stated on page 11 of the EA, trails were adjusted or eliminated in Alternative B where private landowners did not want the trail crossing their lands. Some trails do still cross private lands in the project area, and in these cases it is a standard practice of the Forest Service to work with willing landowners to pursue legal access for trails in the form of easements or other legal instruments (see EA page 18). The Forest Service has also committed to continuing to work with landowners on future trail layout (EA page 24, first bullet).

**Issue 15. Wildlife: Habitat** (Standing: Short, Farley, Kram, Sheets, McCarthy, Stewart, Wagner):

15.A. Concerns that analysis about area wildlife habitat destruction and fragmentation is missing, and that ARNF Forest Plan guidelines for wildlife are not considered. No recent “on the ground” wildlife studies have been conducted in this area in preparation for this proposal. This is irresponsible. It should be required when proposing a disturbance of habitat along with factoring in all of the recent clear cuts and “thinnings” in the area.

*Objection Response:* Potential effects of the project on wildlife are addressed in the EA. The Wildlife Specialist Report extensively evaluated effects to wildlife. A detailed discussion on numerous wildlife species and existing habitat conditions is found in the EA on pages 56-63. Details regarding federally listed Proposed, Threatened, and Endangered wildlife species (PETS) are found on pages 64-85. Forest Service policy directs wildlife biologists to consider direct and indirect impacts to wildlife as well as cumulative impacts. Those components are included in the EA and meet policy requirements (EA, pg.63-64). In addition, specific issues discussed and evaluated in the Magnolia Trails Project EA include; a) Effective Habitat, b) Interior Forest, c) Forested Corridors, d) Key Winter Range, and e) Road/Trail Density. These issues are addressed relative to affected species such as elk, deer, large predators, management indicator species (MIS) and federally listed species. Because this project will reduce the total
number of trail and road miles and restrict bikers and equestrian riders to trails, the project is expected to reduce impacts to habitat quality, native plants and wildlife. Impacts from vegetation projects in or near the project area are addressed in detail regarding numerous wildlife species in the wildlife specialist report in the cumulative impacts section (Wildlife Specialist Report, pg. 69-73). Additional consideration of those projects is found in the Wildlife Specialist Report in the environmental baseline for lynx (pg.33-34), and in the cumulative effects section (pg.40-41). Chapter 3 of the EA addresses past, current, and future projects in the area that may cause impacts to the local community and recreationists are also addressed in the EA (pg. 33-38).

**Issue 15.B.** An additional special note that should be included when looking at further habitat intrusion and loss are two new egress routes being planned from Big Springs exiting onto Magnolia in the area in question. As you know one will damage a unique fragile wetlands habitat. This additional disturbance has not been accounted for in this plan.

**Objection Response:** The Magnolia Trails Project was developed by use of an interdisciplinary team which included a wildlife biologist, botanist, soil scientist, recreation manager, and others. The proposed trail system was designed to minimize resource impacts while still providing for recreation. Potential impacts to wetland and riparian areas from trail construction/deconstruction are addressed in the Soils and Water section of the EA (pg. 50-53). The existence of wetlands in the project area and the fact that extensive surveys for wetlands have not been conducted is acknowledged in the EA (pg. 44). Design criteria were developed specifically to avoid impacts to wetlands and other resources. One example is the general design criteria; Pursue a collaborative approach to trail layout, utilizing input from user groups, landowners and other agencies. Eleven additional design criteria specifically address water resources and soils, including criteria which specify avoidance or minimization of trail construction in wetlands (EA, pg. 26). The proposed process of trail planning and construction/deconstruction ensures that wildlife, their habitats, and wetlands/riparian areas are better protected. Rather than conducting extensive surveys upfront, focused surveys can be completed in real-time, at specific locations, and that will reflect current conditions.

The ingress/egress routes were considered under cumulative effects for wildlife sensitive species on page 73 of the EA.

**Issue 15.C.** Forested Corridors – “Defined in the Forest Plan (USFS 1997) by a combination of forest structural stages, minimum area of 20 acres, minimum width of 100 meters, and maximum width of gaps or interruptions of 100 meters, mapped forested corridors are abundant Forest-wide.” Can you delineate on the map where the corridors are?

**Objection Response:** Mapped forested corridors are addressed in the EA and in the Wildlife Specialist Report. Two patches of interior forest are qualitatively mapped in the project area – one northwest of the Front Range trailhead (East Magnolia zone) and the other directly west of Manchester Lake and north of Rollinsville (South Magnolia zone) (EA, pg 58, Wildlife Specialist Report, pg. 26-27).

**Issue 15.D.** Area Impacts - The last study on the elk herd's migratory corridor (& local observation) indicated they use a path through the Toll property, Los Lagos area, E flank of Buckeye Mt, & E. Flank of Tennessee Mt. Trails in these areas could seriously impact herd movement. From Arapaho Ranch, the elk move between the high school and town and Magnolia Rd. To state that there is already lots of degradation of their corridor caused by roads, landowners, and other forest management practices does not make it okay to further degrade and
fragment the corridor between their summer and winter grounds. According to the Forest Plan, you should not be reducing effective habitat below 50% or further reduce effective habitat that are already at or below 50% effective and should work to increase habitat effectiveness. The Toll area and Reynold's ranch area should be removed from the trail plan, as they provide the largest relatively undisturbed areas for wildlife.

**Objection Response:** This issue is extensively addressed in the EA and in the Wildlife Specialist Report. The Magnolia Trails Project was developed by use of an interdisciplinary team which included a wildlife biologist, botanist, soil scientist, recreation manager, and consultation with Colorado Parks and Wildlife. The proposed trail system was designed to minimize wildlife impacts while still providing for recreation. Based on CPW population estimates for the Clear Creek elk herd, the Clear Creek herd remains within population objectives. Elk are generally adaptable and CPW is not currently concerned about impacts to population numbers (Larry Rogstad, CPW, pers. comm. February 1, 2016 [EA, pg. 69]). Adaptive management included in Alternative B provides for trail closures, rerouting or other measures if determined necessary for resource concerns, such as elk migration or raptor nesting. There are currently no seasonal closures to non-motorized use in the project area based on key elk or deer winter range, and no such need has been identified by CPW or USFS biologists to date (Wildlife Specialist Report, pg. 22). Because this project will reduce the total number of trail and road miles and restrict bikers and equestrian riders to trails, the project is expected to reduce impacts to habitat quality, native plants and wildlife, including elk. As noted in the EA, effective habitat is below Forest Plan standards and the proposed project would increase habitat effectiveness over the existing condition (EA, pg. 62).

**Issue 16A. Wildlife: Inadequate Analysis/Monitoring (Standing: McCarthy, Stewart, Wagner):**

Inadequate Analysis Elk, Bears, Mountain Lions, and Migratory Birds - “Existing system and social trails and roads are likely impacting elk movement and use of forage. CPW personnel and local residents have observed changes in of elk occurrence and movement in different areas, however there are no recent studies attempting to document or quantify such changes.” Yet, the EA also states: “The finding for all Management Indicator Species analyzed, including elk and mule deer, is "No change to Planning Area (ARNF) populations." What kind of analysis is this that includes no recent studies documenting or quantifying changes in elk occurrence and movement? How do you know it won’t affect the populations? This is not a very thorough EA; perhaps a more comprehensive EIS is needed to supply data for this project. Bears and mountain lions are not mentioned in the EA, but require cover and habitat for breeding and denning. Migratory birds are inadequately addressed. The EA fails to provide actual bird and mammal population data.

**Objection Response:** The Wildlife Specialist Report analyzes this project for impacts to wildlife and utilizes any existing data and relevant scientific journal articles. When specific data are lacking this is noted in the report. Scientific studies are costly, time-intensive, and are not required by Forest Service policy to analyze a project proposal. Results of applicable scientific studies are evaluated by the wildlife biologist in conjunction with professional judgement and experience to develop conclusions. MIS species, including a number of migratory birds and elk, are addressed in the specialist report along with trend data for those populations (Wildlife Specialist report, pg. 69-73). The Forest Plan and policy do not require analysis for species other than MIS and PETS,
which includes numerous amphibian, fish, birds, mammals, plants and plant communities. Because this project will reduce the total number of trail and road miles and restrict bikers and equestrian riders to trails, the project is expected to reduce impacts to habitat quality, native plants and wildlife.

**Issue 16B. Wildlife: Inadequate Monitoring** (Standing: McCarthy, Stewart, Wagner):

Monitoring - I am concerned that statements in the EA acknowledge both the need for monitoring wildlife & plant communities and the lack of it that has gone into the planning of this project. Quoting from the EA: “Monitoring elk movement by Forest Service wildlife biologist in conjunction with monitoring by Colorado Parks and Wildlife and others to determine if adaptive management is needed to protect the elk migration corridor and/or winter range.” Which would indicate it should be done before trails are planned and built.

*Objection Response:* The Magnolia Trails Project was developed by use of an interdisciplinary team which included a wildlife biologist, botanist, soil scientist, recreation manager, and others. Colorado Parks and Wildlife was also consulted. The proposed trail system was designed to minimize wildlife impacts while still providing for recreation (EA pp. 3-4). Potential impacts to wildlife from trail construction/deconstruction are addressed with Design Criteria (EA, pg. 26-27). Several design criteria call for consultation with wildlife biologists before construction begins. This process of trail planning ensures that wildlife, their habitats, and wetlands/riparian areas are better protected. Rather than conducting extensive surveys upfront, focused surveys can be completed in real-time, at specific locations, and that will reflect current conditions.

**Issue 17. Wildlife: Cumulative Effects/Other Projects** (Standing: McCarthy, Stewart, Wagner, Magnanini, Corvo, Corvo):

West Magnolia Vegetation Treatments - “Current forested corridor mapping does not include updates for vegetation treatments on NFS lands in West Magnolia and some areas further east along Magnolia Drive, and does not include vegetation treatments on County, private, and other lands. Openings created by vegetation treatments have reduced forested corridors locally in these areas, until trees regrow sufficiently to provide forested corridors again.” These treatments may have a huge impact on wildlife and local residents and should be included before the project is approved.

*Objection Response:* This issue is addressed in the EA and in the Wildlife Specialist Report. The fact that current mapping does not include vegetation treatments in West Magnolia and on County or private lands is acknowledged in the EA (pg. 58-59). Impacts from those vegetation projects are addressed in detail regarding numerous wildlife species in the wildlife specialist report in the cumulative impacts section (Wildlife Specialist Report, pg. 69-73). Additional consideration of those projects is found in the Wildlife Specialist Report in the environmental baseline for lynx (pg.33-34), and in the cumulative effects section (pg.40-41) Chapter 3 of the EA addresses past, current, and future projects in the area that may cause impacts to the local community and recreationists are also addressed in the EA (pg. 33-38).

**Issue 18. Wildlife: General** (Standing: Corvo, Corvo, Magnanini)

In this Environmental Assessment or in this plan the US Forest Service still does not adequately address the effect on the wilderness area wildlife.
Objection Response: Although unclear, this seems to imply that effect to wildlife in a “wilderness area” is not adequately addressed. The project area does not include any designated wilderness areas and, therefore, no effects to wildlife species in wilderness would be expected. The effects analysis would be brief and reflect that.

Potential effects of the project on wildlife are addressed in the EA. The Wildlife Specialist Report extensively evaluated effects to wildlife. A detailed discussion on numerous wildlife species and existing habitat conditions is found in the EA on pages 56-63. Details regarding federally listed Proposed, Threatened, and Endangered species (PETS) are found on pages 64-85. Forest Service policy directs wildlife biologists to consider direct and indirect impacts to wildlife as well as cumulative impacts. Those components are included in the subject EA and meet policy requirements (EA, pg.63-64). In addition, specific issues discussed and evaluated in the Magnolia Trails Project EA include: a) Effective Habitat, b) Interior Forest, c) Forested Corridors, d) Key Winter Range, and e) Road/Trail Density. These issues are addressed relative to affected species such as elk, deer, large predators, management indicator species (MIS) and federally listed species. Because this project will reduce the total number of trail and road miles and restrict bikers and equestrian riders to trails, the project is expected to reduce impacts to habitat quality, native plants and wildlife.


Noxious Weeds - While it is acknowledged that trails can be the point of introduction of noxious weeds, not enough is said about how to deal with this problem. The USFS doesn’t have adequate personnel to deal with current noxious weed infestations. Who will identify, monitor, and deal with infestations caused by this project?

Objection Response: This issue is addressed in the Magnolia Trails Project EA and the Biological Report for Plants for the project. Noxious weeds will be dealt with by following the concepts and practices detailed in the ARP Noxious Weed Management Plan and by use of project specific Design Criteria, described in the EA (pg.25). Six different Design Criteria are in place to minimize noxious weed introduction and spread. These involve items such as cleaning of all equipment used in trail work, use of certified weed free seed for revegetating disturbed areas, and coordinating with the District Invasive Plants Coordinator. The Coordinator will be consulted to locate staging areas and will assign a trained weed spray technician to treat weeds prior to implementation. Monitoring for noxious weed infestations is also described in the Biological Report and EA (pp 20-22). Monitoring will occur during project implementation by personnel involved in trail work. Thereafter, Forest Service recreation crews and Forest Service partners, either during routine maintenance or recreational use of the trails, would inspect the condition of the trail system for safety and resource concerns. Inspections would be recorded on Forest Service provided inspection sheets. Treatments will be conducted by Forest Service staff. Priority areas for monitoring are also identified in the report.

Issue 20. Motorized Use – Maintain Motorized Use (Standing: Jones):

The public's desire for expanded multiple use access and lack of opportunity for multiple use on the Boulder Ranger District have been conveyed to the USFS via on-going public input. There has been overwhelming support for reopening Rollins Pass Road. The imbalance of multiple use demand and opportunity areas on Boulder Ranger District has been compounded by the loss of riding opportunities due to the 2013 flooding. The opportunities in areas impacted by flooding must be restored prior to any trail development proposals that further reduce multiple use
opportunities in the area. The proposal provides a significant increase in trail mileage in the Magnolia area but fails to address the lack of maintenance funding that has been consistently identified as the reason for loss of multiple use routes in the Boulder Ranger District.

**Objection Response:** The availability of motorized opportunities throughout the Boulder Ranger District, and specifically Rollins Pass Road is outside the scope of the project.

There are numerous factors that guide prioritization of projects on a given National Forest. While funding for trail improvement, maintenance and construction will continue to be a challenge into the future, funding will not solely dictate what types of projects the Forest Service chooses to prioritize. The Magnolia Trails Project was initiated based on various factors, including the need to address environmental changes in the area and to coordinate with other jurisdictions preparing for and undergoing interconnected recreation planning in the vicinity (see EA pages 3, 35). Funding for implementation of the Magnolia Trail Project actions will be pursued through annual allocations, grant funding, partnerships, and other alternative sources as described on pages 6 and 13-14 of the Draft Decision Notice.

The prominence of non-motorized uses in the Magnolia area is well-established and these uses have been the focus of the area since at least 1997 according to the Forest Plan Summer Travel Strategy Map that identifies this area for “No Motorized Trail; Opportunities Exist; No Increase Expected.” Public input gathered for the 2003 Caribou-West Magnolia EA validates this use, and input gathered through the Magnolia Trails project further reflects that mountain biking and other forms of non-motorized use are the primary recreation uses on the existing trails within the Magnolia Trails project area.


The Forest Service should maintain motorized use of all current roads on the MVUM, especially those that traverse private property. These public roads provide the best access routes to public lands and provide crucial support routes for forest management and wildland fire fighting.

**Objection Response:** The proposed action would reduce miles of NFS roads from approximately 18 miles to 16 miles (see EA page 23, Table 2). The proposed action would have a negligible effect on motorized opportunities in the area because of the existing redundancy of roads and the limited changes being proposed to the overall miles of roads (see EA page 41). Administrative access used for forest management and emergency response will actually increase as a result of the proposed action (see EA page 23, Table 2). The proposed action does close some roads that traverse or end at private property in order to meet private landowner concerns and neighboring land agency management objectives. These include NFS Roads 512.1, 512.1A, 105.1A/B/C, and 503.1 (see Appendix B).

**Issue 22. Forest Plan Conflicts** (Standing: Jones):

The project conflicts with the standards for the management of recreation in the area according to the 1997 Revision of the Arapaho and Roosevelt National Forests and Pawnee National Grassland Land and Resource Management Plan (Figure 2.7 on page 70).

**Objection Response:** The Magnolia Trails project area is not within the referenced James Creek Geographic Area, and therefore Forest Plan direction from Figure 2.7 on pg. 70 does not apply here. Assuming the objector meant to reference the Lump Gulch Geographic Area, which the majority of the project area falls within, the project is consistent with the goals and desired conditions of the Lump Gulch Geographic Areas as

**Issue 23. Motorized Use – Consistency with Boulder County** (Standing: Jones):

The Forest Service should not emphasize consistency with Boulder County Open Space plans because these plans are inconsistent with the Forest Service’s multiple use mandate. The Forest Service must provide a wide range of recreational opportunities to those living in the Boulder County vicinity because Boulder County provides extensive mechanized and non-motorized route networks in the general Magnolia area while prohibiting multiple use recreation on all Boulder County lands.

**Objection Response:** The National Environmental Policy Act (NEPA) mandates those Federal agencies responsible for preparing NEPA analyses and documentation do so "in cooperation with State and local governments" and other agencies with jurisdiction by law or special expertise. (42 U.S.C. 4331(a), 4332(2); 40 C.F.R. 1501.6, 1508.5). As a general practice, the Forest Service strives to be as consistent as practicable with adjacent county, agency, or tribal plans. In this case, open space lands managed by Boulder County are located adjacent to and throughout the project area, and contain a number of trails that connect onto Forest Service lands. Boulder County’s intended use for this area does not differ greatly from the Forest Service’s previously established management direction (see 2003 Caribou-West Magnolia EA, chapter 2, page 3). In addition, as stated on page 3 of the EA, the County’s Reynolds’s Ranch Open Space and the Toll Conservation Easement offer unique opportunities to tie in with the trail systems that Boulder County is planning, which has compelled the Boulder Ranger District to partner with Boulder County to provide sustainable connector trails. While the Forest Service has endeavored to be consistent where practicable, note that full consistency was identified under “Issues Considered but Not Analyzed Further” (EA, page 13). Within the Boulder Ranger District there are 205 miles of roads (many very primitive) that provide motorized recreation opportunities (EA, page 111).


Winter travel management decisions are arbitrary and furthers the existing imbalance of winter recreational opportunities on the Boulder Ranger District. The Organizations submit that it is completely unacceptable to close the entire proposal area to OSV usage as the analysis of winter recreational usage in the Proposal suffers from many of the same foundational oversights as the summer management standards. There are numerous areas outside Magnolia area that are currently managed for non-motorized recreation in the winter time and these areas must be looked at as the primary opportunity areas for users seeking non-motorized winter recreational opportunities. Again these types of balanced usage are not pursued and closure of the Magnolia area to OSV is identified as the first step for management of the area. The Organizations are aware that the Magnolia area is not a destination location for OSV travel in Colorado due its lower altitude and limited snowfall. Nonetheless the Proposal area represents an important recreational resource for the snowmobilers in the community and many riders in the area use these routes to obtain quick rides after a snowfall, bring new riders into the backcountry and to insure that equipment is working properly prior to traveling. These types of opportunities are in exceptionally limited supply throughout most of the Front Range due to limited snowfalls, making any of these local close to home type opportunity areas highly valued to all users.

**Objection Response:** The purpose and need section of the EA provides information on Forest Plan guidance for travel management in this area:
• Manage road and trail systems in the area to provide a variety of recreational opportunities while minimizing human-wildlife conflicts, particularly in flora and fauna emphasis areas (management area 3.5). This will be accomplished in the West Magnolia portions of the geographic area by closing roads to motorized vehicles, including snowmobiles, during the winter and spring.

Currently, winter snowmobile use within the project area is minimal and is not a destination activity. This is largely due to inconsistent snowpack and limited access points and trailhead parking for snowmobile trailers (EA pg. 35). Thus, the effect of closing the area to winter motorized travel on recreational opportunities is minimal. The proposed action to eliminate snowmobiling and any other winter motorized use within the project area is consistent with Forest Plan winter travel management strategy (“not emphasized”) for the Lump Gulch Geographic Area which covers the majority of the affected project area. Additionally, current agency direction for lynx habitat would preclude snowmobile activity within the Lynx Analysis Unit (LAU) due to snow compaction limitations. The LAU includes the western portion of both the West and South Magnolia zones (EA pg. 41).

The record for the project shows that the Forest followed direction in the Forest Plan and analyzed the impacts of the proposal and therefore the decision was not arbitrary.

**Issue 25. Incorrect Trail Mileage** (Standing: Long, Pfeffer, McCarthy, Boswell, Stewart, Wagner, G. Blakey, Hughes, Short, Markoevich):

Mileage of trail system seems to be unclear or incorrect. The EA indicates 28.95 miles of trail to be obliterated as well the reduction of approximately 18 miles of social trails. My review of the associated Map indicates, in my estimation, only 3 miles of trail and roads that will be taken out of service and as well doesn’t account for new trails being added.

**Objection Response:** The implementation strategy and schedule section of chapter 2 defines road and trail mileage summaries, and in addition, Tables, 1, 2, and 3 located on pages 22-24 and Table 4 located on page 28 breakdown mileages in detail. Additionally, Maps 5, 6, and 7 located in Appendix A describe the associated road and trail system mileage in further detail. These road and trail mileages for both alternatives are only on Forest Service System lands.

**Issue 26. Ecological Zones** (Standing: No objectors have standing on this issue):

The EA incorrectly states that most of the project area occurs in the lower montane and montane climatic zones, with areas of sub-alpine as elevation increases towards the western part of the analysis area. However, USFS documents show that the project area is entirely in the Upper Montane and Sub-Alpine both by altitude and vegetation type.

**Objection Response:** This project is primarily located within the Lump Gulch Geographic Area as identified in the 1997 Revision of the Arapaho and Roosevelt National Forests and Pawnee National Grassland Land and Resource Management Plan (page 81), which specifically states this geographic area contains a mix of lower and upper montane and subalpine plant communities. Based on the elevation range of the specific project area, each of these three zones can generally be described as occurring within the project area. Further delineation of these zones within the project area would not have a bearing on the site specific impacts already disclosed in the EA.
**Issue 27. Public Notification** (Standing: No objectors have standing on this issue):

The 2015 comment period was added because too many people were not informed about the trails plan, including land owners whose land was crossed by these trails in the earlier proposal. Most people in the area were not notified about the 2013 meetings, nor included in the surveys. How many public meetings were there and when did they occur?

*Objection Response:* The Forest Service began involving the public in 2012 (EA pg. 109). An initial scoping period began in August 2013 and the Forest Service held an informational meeting at the Nederland Community Center the same month. In response to the 300 comments received during this initial scoping/comment period the proposal was modified and added 1700 acres to the project area. Due to the additions and the length of time since the first scoping period, the Forest Service wanted to provide the public another comment period. The additional comment period was initiated in September 2015 and over 400 letters and emails were received containing approximately 800 unique comments. In response to the comments received the Forest modified its’ proposal again (Draft DN pg. 3; EA pg. 8). In addition to Forest Service outreach, a Colorado State Trails Planning Grant funded a planning effort that included a public open house and a survey of recreational users of the Magnolia Area. More than 20 stakeholder groups and agencies and nearly 700 individuals were contacted. From these efforts a Proposed West Magnolia Trail System Master Plan was developed. (Draft DN pg. 3; EA pg. 8-9)

The Code of Federal Regulations at 40 CFR 1501.7 states that scoping is to be “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” Based upon the Project Record for the Magnolia Non-Motorized Trails project the Forest provided adequate opportunities for public participation in this effort.

**Issue 28. Range of Alternatives – Fewer Trails** (Standing: No objectors have standing on this issue):

One alternative of do nothing and a second basically unchanged from the proposed action hardly could be described as a “range of alternatives”. It would’ve been much more in line with the goals of the forest to have created a third Alternative C with fewer trails.

*Objection Response:* The Forest Service initiated public scoping and requested comments on its proposed action in August 2013. In response to requests for connectivity, and with the agreement between the Toll family (private landowners) and Boulder County to establish the Toll Conservation Easement Trail to the south and west of the project area, the Forest Service revised its proposed action by expanding the project area south and west, adding an estimated 1,700 acres. Additionally, this revised proposed action addresses many of the other comments such as: intermixed private lands and private landowner concerns; Nordic and equestrian opportunities; and trail sustainability. Because of these additions, and the length of time since the first scoping, the Forest Service wanted to provide the public another comment period. The result of the initial scoping efforts led to a second proposed action that was scoped in September 2015. The result of this scoping effort led to changes to the third proposed action that was ultimately analyzed in the EA (EA pg. 8).

In addition to the 3 iterations of the proposed action, the Forest considered ten additional issues for inclusion into alternatives. While these issues were considered as possible
alternatives to be included in the analysis, for reasons stated in the EA they were not fully analyzed (EA pgs. 12-13).

The Forest Service Handbook (FSH 1909.15 Chapter 10) states that for an EA:

*The description of the proposal and alternative(s) may include a brief description of modifications and incremental design features developed through the analysis process to develop the alternatives considered. The documentation of these incremental changes to a proposed action or alternatives may be incorporated by reference in accord with 40 CFR 1502.21. (36 CFR 220.7(b)(2)(iii))*

The Forest Service Handbook (FSH 1909.15 Chapter 10) further states:

*Modifications and incremental changes to the alternatives may be considered as part of the range of alternatives. Documentation of these incremental changes must be available in the record. In an EA, documentation may include a brief description of modifications and other incremental changes to the proposed action and alternative(s).*

*The range of alternatives considered by the responsible official includes all reasonable alternatives to the proposed action that are analyzed in the document, as well as other alternatives eliminated from detailed study. Alternatives not considered in detail may include, but are not limited to, those that fail to meet the purpose and need, are technologically infeasible or illegal, or would result in unreasonable environmental harm.*

*Because alternatives eliminated from detailed study are considered part of the range of alternatives, the project or case file should contain descriptions of the alternatives and the reasons for their elimination from detailed study.*

The Project Record for the Magnolia Non-motorized Trails analysis indicates that there was a reasonable range of alternatives considered for this project.

**Issue 29. Special Use Authorization** (Standing: No objectors have standing on this issue):

The EA states winter grooming will operate under a special use permit authorization with the Forest Service. Specific inquiries consist of who will provide the machine and service, will it be free for users, and lastly how will the machine effect wildlife and other recreation users.

**Objection Response:** The proposed action describes winter grooming for Nordic and fat tire use will be allowed on approximately 4 miles of existing roads (EA, pg. 2). The revised proposed action for the accommodation of winter sports includes allowing multi-use groomed non-motorized winter use that will be initiated under a special use authorization (EA, pg. 11). The authorization would highly depend on partnership/volunteer group involvement with continued fundraising support and grant applications. A fee structure was not analyzed in the Environmental Analysis, and will be determined throughout the implementation process. The adaptive management for this proposed system of trails describes in detail the triggers for not passing inspection as follows: 1) not meeting Forest Service trail standards and trail management objectives; 2) changes in the environmental landscape, 3) social use and user interaction on trails or 4) lynx habitat impacts due to snow compaction by winter forest users. If one or more of these triggers are identified the trail may be temporarily closed until repaired (EA Pg. 19-20).

Wildlife issues are extensively addressed in the EA and Wildlife Specialist Report. The southwestern portion of the project area is located within the Boulder Lynx Analysis Unit.
(LAU), and the remainder of the area is not within any LAU. There are no known breeding lynx in the Boulder LAU. Winter snowmobile use within the project area is currently minimal. The proposed narrow, linear trail corridors are not expected to impact connectivity, as forest cover and connections would remain. Mapped lynx habitat is distant from access points and not likely to receive high winter use. Winter use is not expected to reach levels that would consistently compact snow. Any impacts to lynx are expected to be minimal, and considered insignificant and discountable (EA, pg. 73-74). No other wildlife species are expected to be significantly impacted by the project or winter trail grooming (EA, pg. 77-78).