



COLORADO
Department of
Natural Resources

November 14, 2024

Forest Supervisor Russ Bacon,

This letter is to give you notice that Colorado Parks and Wildlife and the Department of Natural Resources has decided to formally withdraw our objection to the Mad Rabbit Trails Environmental Assessment, Notice of Decision, and FONSI. Our withdrawal is conditioned on the inclusion of an appendix within the final Record of Decision containing and incorporating a copy of the Adaptive Management Plan, along with a reference in the Notice of Decision to the need for project implementation to follow the terms outlined in the agreed upon Adaptive Management Plan. We have greatly appreciated you and your staff's willingness to collaborate with us on a shared Adaptive Management Plan which sufficiently addresses enough of our concerns to withdraw our objection. Joint development of the Adaptive Management Plan has been an extremely positive and collaborative process and we want to thank you for the considerable time and effort spent towards finding this common ground.

While we are comfortable with USFS utilizing the jointly developed Adaptive Management Plan to guide the implementation of the Mad Rabbit Trails project moving forward, we want to reiterate a few of our outstanding concerns related to the project, which we outlined in our objection letter:

- A forest plan update is needed to ensure the current landscape-scale view is being used to preserve the proper balance between recreational infrastructure development and wildlife habitat conservation across the forest.
- While we recognize that trail development projects can be permitted through inventoried Colorado Roadless Areas (CRAs), limits on high-density development and use in CPW-identified High Priority Habitat areas within CRAs may be appropriate to maintain both wildlife habitat and the wild characteristics that CRAs were designated to conserve. This should be given serious consideration in the future forest plan update.
- While we greatly appreciate the inclusion of funding to support ongoing maintenance and stewardship of the trails in question, we remain concerned about the lack of dedicated funding available to support this key piece of the Adaptive Management Plan, particularly given some of the looming USFS budget shortfalls.

To summarize, we believe the incorporation of the Adaptive Management Plan addresses the bulk of the concerns outlined in our objection letter to the Mad Rabbit Trails EA. Accordingly, we withdraw our objection and appreciate the coordinated development of the associated Adaptive Management Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Gibbs", written in a cursive style.

Dan Gibbs
Executive Director