

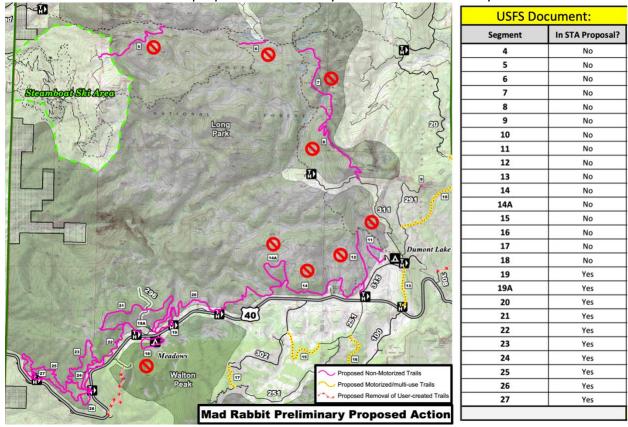
2A Steamboat Trails Alliance proposal and Mad Rabbit

On November 3, 2013 voters in Steamboat Springs approved Referendum 2A for the "development of trails in and around the city in accordance with the Trails Alliance proposal" to be funded by the existing public accommodations tax. The Steamboat Springs Trail Alliance (STA) proposal includes an enumerated list of 46 projects that include trails and amenities in and around Steamboat Springs. The first \$600,000 of annual accommodations tax revenue is reserved for projects on this list.

Up until recently, the city had been faithfully following the law by only funding projects from the enumerated list. That changed in August 2019, when the 2A Trails Committee <u>voted to approve</u> nine US Forest Service (USFS) Mad Rabbit trails not in the STA proposal for funding. This is in spite of the US Forest Service's <u>own published appraisal</u> that none of these nine trails were part of the STA proposal. Keep Routt Wild's independent analysis agrees with the USFS conclusion- none of these nine trails have ever been part of the STA proposal. Specifically:

- Mad Rabbit Trails 5, 6, 7, 8, 11, 12, 14, 14A, and 18 have never been part of the STA proposal.
- USFS document here, released during the most recent Mad Rabbit comment period also states the above trails are not in the STA proposal.
- Nevertheless, the 2A Trails Committee on <u>August 21, 2019</u> voted to fund these trails by redefining them under a creative "functional equivalency" test as qualifying for coverage under the STA document.
- Funding trails not in accordance with the STA proposal violates both the letter and the spirit of Referendum 2A.
- This violation has an immediate financial impact of authorizing 2A funds for NEPA analysis of trails which are not within the STA proposal.
- This violation has a longer term financial effect of reducing the available funding for the development of trails which are actually within the STA proposal.
- This violation also has the impact of diverting funding of trails and amenities specifically approved by the voters in 2013 to trails not approved by the voters.
- There are many desirable trails and amenities in the STA proposal not being funded.
- The USFS uses the availability of 2A funding as one of their criteria for prioritizing the development of Mad Rabbit trails (see USFS email in dated September 22, 2019, in References & Links page).
- With the draft EA (Environmental Assessment) of Mad Rabbit expected later this year, the City needs to act promptly to remove funding for trails not in the STA proposal and clarify with the USFS which trails would be funded by 2A, and which trails would not.

Below is the preliminary proposed map of Mad Rabbit from July 2019, along with a USFS table specifying which trails are included within STA. The red Symbol near the trail number denotes trails not in the STA proposal but currently chosen to be funded by 2A dollars.

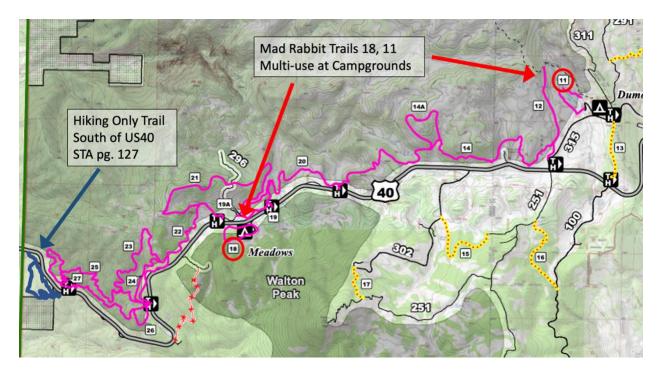


We found, as did the Forest Service, that the non-motorized trails north of US40 from Bruce's Trail westward through Ferndale generally met the criteria of being described in the STA proposal. These are trails #19 and higher. The one issue we discovered with these trails was the USFS' decision to eliminate the bike park by eliminating any wood features in the Ferndale area. This redefines STA Directional Trails #1 and #4 by removing these features. While the functionality was changed, the general route of the trails were not. We've accepted these as "close enough" though the key functionality of a bike park is eliminated.

The July 17, 2019 minutes stated, "Committee members wanted to start with a trail-by-trail comparison to determine what is eligible for funding." The August 21 minutes continue with city staffer Winnie DelliQuadri <u>stating</u>, "So it's clear that the STA vision is not being fully realized. The land manager has chosen to scale it back. The question is: Which of the trails in the STA proposal fits into what the Forest Service is proposing based on type of trail, generic distance, whichever of the other factors you want to consider?"

Through <u>four separate votes</u>, the 2A Trails Committee added the nine non-motorized Mad Rabbit trails to be funded by the city by stating that they are functionally equivalent to trails in the STA proposal. We analyze each of the four votes below.

Mad Rabbit Trails 11 and 18: Dumont Lake and Meadows Campground trails.¹



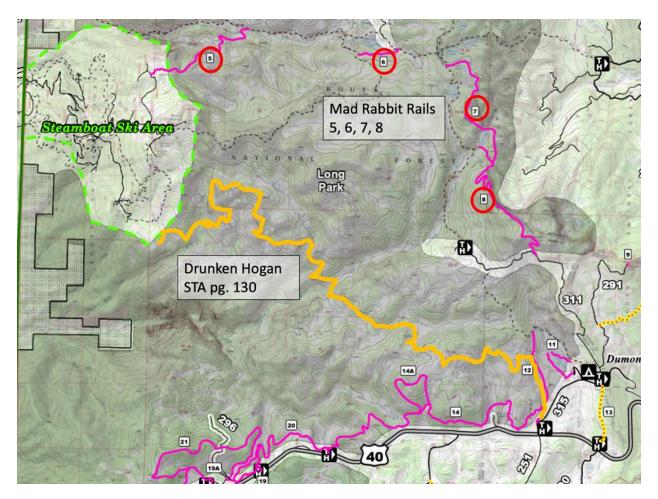
Neither the Dumont Lake trail (#11) nor the Meadows Campground trail (#18) are included in the STA proposal. The 2A Committee declared them the same as a hiking-only trail planned for south of US40 across from Ferndale.

These two Mad Rabbit trails are not remotely correlated with the hiking-only trail described in the STA proposal, neither functionally nor geographically. The hiking-only trail offered a serene hiking experience across from Ferndale. The Dumont Lake and Meadows CG trails are multi-use trails purpose-built around an amenity and envisioned to be used by campers in the nearby campgrounds.

In the 2A Trail Committee <u>minutes</u> one member declared after the vote, "If we stretch these alignments, do people start questioning what we're doing with the other trails?"

¹ In this map and others we often refer to a page number within the Steamboat Trails Alliance proposal. This is the page number when viewed as a PDF. This differs from the page number displayed in the lower right corner by six. In this case, page 121 will be displayed in the lower right corner of the page.

Mad Rabbit Trails 5, 6, 7, 8: Fish Creek, Long Lake, and Continental Divide Trail



Trails 5, 6, 7, and 8 are not in the STA proposal. They were declared equivalent to the Drunken Hogan trail (STA pg. 130), though they don't deliver the same functionality and are not in the same geographic area.

The STA proposed a single contiguous 15-mile trail from US40 near Dumont to Pete's Wicked Trail at the southern end of the Steamboat Ski Area, while the 2A Trails Committee declared this equivalent to four segments described in Mad Rabbit. They declared this the equivalent by saying they served the same purpose to "provide an alternate route between Steamboat Ski Area and Dumont Lake Campground. This alternative will reduce pressure and resource damage on the popular Continental Divide Trail by dispersing users."

This is a false equivalent. First, Trails #5 and #6 are redundant to Mountain View trail and not needed at all for this purpose. Trails #7 and #8 create multiple loops when combined with the Continental Divide Trail accessible from Dumont. This will increase traffic on the CDT, and not avoid it as in the original STA proposal. Finally, the four Mad Rabbit trail segments are miles away from Drunken Hogan, are not contiguous, and have neither the same beginning nor end points.

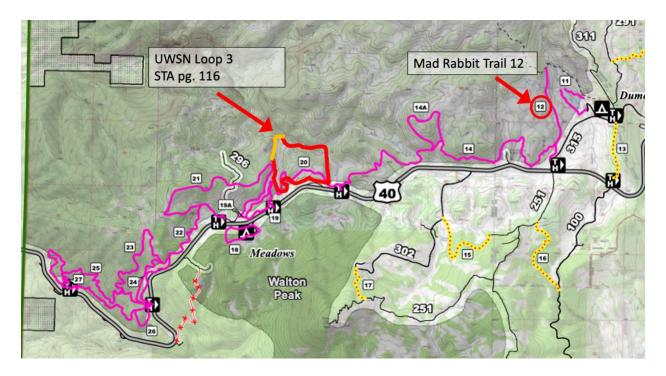
Mad Rabbit Trails 14 and 14A: "Epic trail" along US40 from Bruce's Trail to Dumont Lake



Trails 14 and 14A are part of a USFS-envisioned "epic trail" that would allow bikers to travel west to east alongside US40 until Dumont Lake, and then continue north through the Continental Divide Trail or alternate routes. Trails 14 and 14A are not described anywhere in the STA proposal.

The 2A Trails Committee declared these the same as the UWSN (Upper West Summit Network) Loop 1 (in yellow), which creates a loop when connected to the STA-proposed Walton Rim trail (in red). These are not remotely similar, geographically or functionally. UWSN Loop 1 is described in the STA proposal as, "This 6 mile loop begins and ends at the West Summit of Rabbit Ears Pass. The loop utilizes the first 3 miles of the beginner friendly Walton Rim Trail before turning and climbing 500 vertical feet to a small peak with commanding views." This contrasts with Trail #14 which is a point-to-point trail far to the east.

Mad Rabbit Trail 12: Connector from Dumont Lake entrance to Continental Divide Trail



Trail 12 is a 1.22-mile point-to-point connector from the US40 entrance to Dumont Lake north to the Continental Divide Trail. It is not in the STA proposal. The only trail connecting to Dumont Lake anywhere in the STA proposal is Drunken Hogan.

It was declared equivalent to UWSN Loop 3 by the 2A Trails Committee. Trail #12 is not remotely the same as UWSN Loop 3, geographically or functionally. The UWSN Loop 3 is described as, "This short, 2.5 mile loop provides access to the Walton Rim Trail via two existing parking areas." The project location is described as, "Rabbit Ears Pass. From West Summit parking area." The loop occurs near the Bruce's Trailhead.

Unfunded trails in the STA trails proposal

While the 2A Trails Committee has chosen to fund trails not in the STA proposal, several worthy projects explicitly included in the proposal are not being funded. They include:

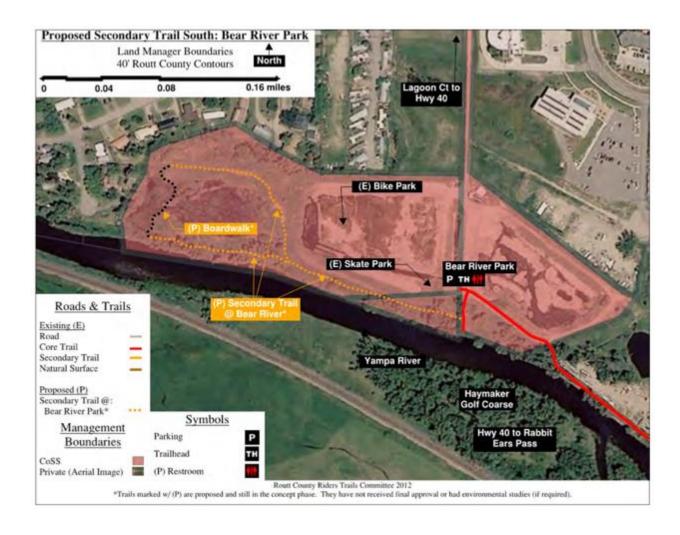
Core Trail South: Legacy Ranch (Page 126 of 140, PDF pg. 132)

Extending the Core Trail was a key driver to the success of Referendum 2A. A city-wide transportation survey noted that expanding the urban trail system gets strong to moderate support from 92% of local citizens. In additional to providing for a recreational experience in a scenic working landscape, the trail extension will increase bird and wildlife watching viewing opportunities and create better access to many well-known and loved tourist attractions including the Yampa River both at the Chuck Lewis State Wildlife Area and beyond, providing additional opportunities for wildlife watching and fishing. It will link bicyclists more safely to River Road, a popular route for road bikers. It will provide safe access to the Haymaker Golf Course and Yampatika's Environmental Learning Center at Legacy Ranch, two popular Cityowned assets.



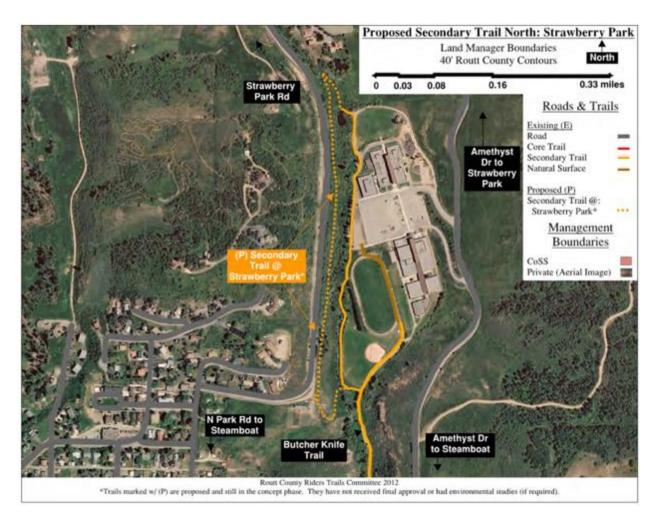
Core Trail West: Bear River Bike Park (Page 128 of 140, PDF pg. 134)

This project provides a loop destination at the west end of the Core Trail until easements can be obtained to continue the Core Trail further west. A nature walk style trail including a boardwalk would provide an alternate activity for family members while others are utilizing the existing Skateboard & Bike Parks at Bear River Park.



Core Trail North: Strawberry Park (Page 129 of 140, PDF pg. 135)

This project provides a loop destination at the north end of Butcher Knife trail. Butcher Knife trail is a well used secondary gravel trail that parallels Butcher Knife Creek and currently dead ends just past the schools. By creating a loop on an old irrigation ditch on the hillside above the school, trail users will have a clear destination on an excellent beginner trail that originates downtown near Old Town Hot Springs and the Rabbit Ears Motel. At approximately 0.5 miles in length and an average grade of approximately 3%, this trail provides an excellent beginner loop with views back toward town that complement the existing trail which parallels Butcher Knife Creek.



Emerald Amenities: Blackmer Dr. (Page 134 of 140, PDF pg. 140)

This amenity would add much-needed additional parking and restrooms for visitors, while relieving congestion for nearby residents.

Currently, Emerald Mountain is accessible via three trailheads: The Stables at the Rodeo Grounds, Mile Run (adjacent to Howelsen Lodge), and Blackmer Drive. Both the Rodeo Grounds and Mile Run provide adequate parking for visitors, however these routes are limiting to families and beginner riders due to the steep grade of the trails. In contrast, Blackmer drive provides much easier access up Emerald's trail network. However, the current on-street parking situation on Fairview Street at the Blackmer trailhead limits opportunities for visitors and creates a congested bottleneck for the Fairview neighborhood.



Other unfunded projects.

The projects above are not the only unfunded projects from the STA list. Other unfunded projects include the Stehley Park beginner pump track, a secondary trail from the Blue Sage area to Amethyst, and Emerald Directional Trail #2.

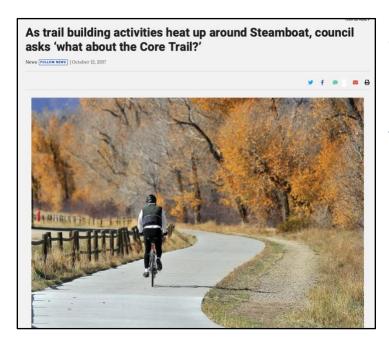
Summary

Nine USFS Mad Rabbit trails not in the STA proposal have been identified for funding by the 2A Trails Committee. Meanwhile projects called out in the STA proposal, including very popular portions of the Core Trail, are not being funded. This violates both the letter and the spirit of the ballot proposal.

Furthermore, the USFS is using the availability of 2A funds as one of their criteria for the priority and phasing of Mad Rabbit's development. This would be reflected in the Mad Rabbit Environmental Assessment (EA). Therefore, the city must clarify this to the US Forest Service before the release of the EA, which may be as soon as May.

The popularity of Referendum 2A was driven by the promise of the Core Trail expansion. As noted in the STA proposal, "A city-wide transportation survey noted that expanding the urban trail system gets strong to moderate support from 92% of local citizens." This undoubtedly was a driving factor in the referendum's 71% success. It was not a mandate to build trails in the forest that weren't even in the proposal.

We ask that the City deal with this issue immediately.



This Pilot article is from 2017, where the city council asks 'what about the Core Trail?'

http://bit.ly/388M28M

References and Links

Referendum 2A ballot initiative

https://www.steamboatpilot.com/news/election-guide-2013-voters-to-have-say-in-how-lodging-tax-is-spent-with-referendum-2a/

Steamboat Trails Alliance proposal

https://steamboatsprings.net/DocumentCenter/View/1927/SteamboatSpringsTrailsAlliance

2A Trails Committee

https://steamboatsprings.net/DocumentCenter/View/1927/SteamboatSpringsTrailsAlliance

2A Trails Committee minutes from August 21, 2019

https://steamboatsprings.net/AgendaCenter/ViewFile/Minutes/ 08212019-934

As trail building activities heat up around Steamboat, council asks 'what about the Core Trail?' https://www.steamboatpilot.com/news/as-trail-building-activities-heat-up-around-steamboat-council-asks-what-about-the-core-trail/

USFS Mad Rabbit documents (Go to 2019 for most recent proposal) https://www.fs.usda.gov/project/?project=50917

USFS Mad Rabbit map with labeled trail segments

https://www.fs.usda.gov/nfs/11558/www/nepa/105838 FSPLT3 4667219.pdf

USFS Mad Rabbit Segment Table (includes STA status)

https://www.fs.usda.gov/nfs/11558/www/nepa/105838 FSPLT3 4729050.pdf

USFS email describing prioritization method of Mad Rabbit trails includes 2A funding status (emphasis/highlight ours)²:

From: Kelly, Brendan T -FS

To: <u>Umphries, Tara -FS; Turiya, Artemisia - FS; Bennett, Rita L -FS</u>

Subject: Updated prioritization of trails in Mad Rabbit **Date:** Sunday, September 22, 2019 3:13:45 PM

All,

I have attached an updated version of the Mad Rabbit PPA table. I prioritized the trails as 1 (first priority this fall, most desired by trails community, 2A funds to plan / implement which are on a timeline), 2, or 3 (don't have 2A funding support, more issue areas (wetland, Forest Plan), motorized which aren't the highest priority by motorized community and don't have 2A funding).

² Received through a Freedom of Information Act request

References and Links (pg. 2)

The following is the complete and expanded view of the Mad Rabbit Segment Table published by the US Forest Service here. We've highlighted the nine trail segments of concern.

Segment	In STA Proposal?
4	No
5	No
6	No
7	No
8	No
9	No
10	No
11	No
12	No
13	No
14	No
14A	No
15	No
16	No
17	No
18	No
19	Yes
19A	Yes
20	Yes
21	Yes
22	Yes
23	Yes
24	Yes
25	Yes
26	Yes
27	Yes