

Chapter 1: Purpose and Need

INTRODUCTION

BRIEF DESCRIPTION OF ROCKY MOUNTAIN NATIONAL PARK AND THE EAST SHORE TRAIL

Rocky Mountain National Park was established in 1915 and is located in north central Colorado. The approximate 265,761-acre park contains spectacular scenery that includes majestic mountains and surrounding lakes, rivers, forests, and meadows. The park is located in Grand, Larimer, and Boulder Counties and is bordered by the town of Estes Park on the east and Grand Lake on the west (see figure 1).

The East Shore Trail is an existing hiking and stock trail that runs roughly north/south along the east shore of Shadow Mountain Lake near the town of Grand Lake, Colorado. The northern terminus of the trail is the East Shore Trailhead, located south of the Town of Grand Lake (see figure 1). The entire trail is 6.2 miles long and ends at the south boundary of the park. The East Shore Trailhead and the first 0.7 miles of the trail are on land administered by the U.S. Forest Service as part of the Arapaho National Recreation Area. Bicycle use is currently permitted on the section of the trail administered by the U.S. Forest Service. The remaining 5.5 miles of the East Shore Trail is within Rocky Mountain National Park. The project area includes the area along and adjacent to the East Shore Trail from the northern boundary of Rocky Mountain National Park, approximately 2 miles south to the trailhead at the Shadow Mountain Dam. Hiking and fishing access to the lake are allowed along the trail. Within the study area, livestock (horses, mules, and llamas) are permitted on the north 0.9 mile. The north 0.9 mile of the trail is also part of the Continental Divide National Scenic Trail. The East Shore Trail corridor within the park is bounded on the west by Shadow Mountain Lake and on the east by designated wilderness within the park.

PROJECT BACKGROUND

Multiple stakeholders, including wilderness advocates and Congressional staff met in January 2006 to negotiate significant components of proposed wilderness legislation for the park. Wilderness designation for the park occurred in April 2009 under the Omnibus Public Lands Management Act of 2009 (Public Law 111-11). The wilderness legislation excluded the East Shore Trail Area from wilderness to "maximize the opportunity for sustained use of the trail without causing harm to affected resources or conflicts among users." (Public Law 111-11) Consideration of bicycle use on the East Shore Trail was part of the legislation. The East Shore Trail area, as described in Public Law 111-11, was a strip of land 1/8 mile wide along the west boundary of the park south of Grand Lake.

Public Law 111-11 required the National Park Service to identify an alignment for the East Shore Trail within one year of the signing of the act in order to establish the official wilderness boundary. The alignment line was submitted to the Secretary of the Interior in 2010, and for the most part follows the existing trail. To allow for bicycle use, some sections would need to be re-routed for public safety, to avoid sensitive natural and cultural resources, and to provide sustainability. Upon submittal of the alignment line, the official wilderness boundary was located 50 feet east of the alignment line (see figure 2). Public Law 111-11 does not require the construction of a trail along the established alignment line.

Grand County and local stakeholder groups have been long-time proponents of improvements to the East Shore Trail to allow bicycle use. The Headwaters Trails Alliance has been the primary proponent for bicycle use on the East Shore Trail. In August 2011, the Grand County Commissioners wrote to the NPS Regional Director, Intermountain Region, requesting that planning

and compliance for the East Shore Trail proceed on the northern 2 miles of the trail within Rocky Mountain National Park. The National Park Service has prepared this environmental assessment to evaluate whether bicycle use should be permitted on that section of the East Shore Trail within Rocky Mountain National Park.

PURPOSE OF AND NEED FOR THE ACTION

“Purpose” is an overarching statement of what the plan must do to be considered a success. In order to address the legislated mandate, the purpose of this project is to maximize the opportunity for sustained use of the northern two miles of the East Shore Trail within Rocky Mountain National Park without causing harm to affected resources or conflicts among users.

“Need” is an overarching statement of why action is required. It summarizes the most important points of the planning process. Stakeholders within the local community expressed a desire to work towards connecting communities and expanding local trail opportunities with a multiuse trail. This desire was embodied in Public Law 111-11 legislation that directed the National Park Service to consider whether or not to allow bicycle use on the East Shore Trail.

PROJECT GOALS

The project goal is to evaluate whether to allow bicycle use on the northern two miles of the East Shore Trail within the park and whether such use can be accommodated without causing harm to affected resources or conflicts among users.

Objectives are specific statements of purpose; they describe what must be accomplished, to a large degree, for the project to be considered a success. The following objectives were derived from the legislation and will be used as a measure of performance of the alternatives in the environmental assessment.

- Realign and improve portions of the northern 2 miles of the East Shore Trail, within the described East Shore Trail area, to achieve a sustainable trail for the identified uses.
- Allow for multiple uses on the northern 2 miles of the East Shore Trail “without causing conflicts among users.”
- Allow for multiple, non-motorized, recreational uses (for example, hiking, biking, equestrian use, snowshoeing, and skiing) on the northern 2 miles of the East Shore Trail “without causing harm to affected resources.”

Based off recent data collected by the park on the East Shore Trail, the highest level of daily use recorded is 60 people and the average use is less than 20 people per day. This is a low level of use compared to many other trails in the park. Park managers anticipate that if the East Shore Trail were opened up to bicycle use, the number of daily users would increase, but it is very difficult to predict by how much. The amount of bicycle use on trails in the vicinity of Grand Lake within the Arapaho National Forest is low, primarily because most trails are also open to motorized use (Orr pers. comm. 2013). Rocky Mountain National Park managers also predict that bicycle use on the East Shore Trail would be low given the minimal distance of 2.7 miles that bicycles would be permitted on the trail, and the fact that the trail would not connect Grand Lake to a significant destination. Some visitors who stay at the Green Ridge Campground within the Arapaho National Recreation Area might choose to ride their bikes to Grand Lake and back, although this is not anticipated to generate a significant amount of trail use.

As required by Public Law 111-11, Rocky Mountain National Park would manage use on the 2-mile section of trail to avoid conflicts among users and prevent harm to affected resources.

Monitoring and adaptive management strategies, in addition to trail modifications, would be implemented to more safely accommodate the anticipated level of use and to ensure that continued use of the trail for multiple uses would not cause harm to natural and cultural resources. Monitoring and adaptive management strategies would also be used to avoid conflicts between users in general, and specifically to prevent substantial interference with the nature and purpose for which the Continental Divide National Scenic Trail was created. The Continental Divide National Scenic Trail Comprehensive Plan states that “the basic goal of the trail is to provide the hiker and rider an entree to the diverse country along the Continental Divide in a manner, which will assure a high quality recreation experience while maintaining a constant respect for the natural environment...” (U.S. Forest Service 2009). The term “rider” in the comprehensive plan refers to equestrians. If bicycle use were permitted on the East Shore Trail, one mile of the trail would be shared with the Continental Divide National Scenic Trail.

By obtaining baseline data, monitoring for resource, visitor experience, and safety over time, and by implementing adaptive management strategies when identified thresholds are reached (see the ‘Adaptive Management’ section in chapter 2), the National Park Service would ensure that objectives for managing bicycle use on the East Shore Trail were consistent with the requirements found in Public Law 111-11.

DECISION PROCESS

In accordance with 36 CFR 4.30 (please see appendix A) the park superintendent may authorize by designation bicycle use on a hiking or horse trail that currently exists on the ground and ***does not require any construction or significant modification to accommodate bicycles*** (emphasis added). However, to accommodate bicycle use on the East Shore Trail modifications that include realigning some sections of the trail must be made for sustainability of the trail and user safety. These modifications involve construction, and therefore must be considered under the “New Trails” section of 36 CFR 4.30. Relevant sections of 36 CFR 4.30 that apply to the East Shore Trail read as follows:

“(e) *New trails.* This paragraph applies to new trails that do not exist on the ground and therefore would require trail construction activities (such as clearing brush, cutting trees, excavation, or surface treatment). New trails shall be developed and constructed in accordance with appropriate NPS sustainable trail design principles and guidelines. The superintendent may develop, construct, and authorize new trails for bicycle use after:

- (1) The superintendent must complete a park planning document that addresses bicycle use on the specific trail and that includes an evaluation of:
 - (i) The suitability of the trail surface and soil conditions for accommodating bicycle use. The evaluation must include any maintenance, minor rehabilitation or armoring that is necessary to upgrade the trail to sustainable condition; and
 - (ii) Life cycle maintenance costs, safety considerations, methods to prevent or minimize user conflict, methods to protect natural and cultural resources and mitigate impacts, and integration with commercial services and alternative transportation systems (if applicable).
- (2) The superintendent must complete either an environmental assessment (EA) or an environmental impact statement (EIS) evaluating the effects of bicycle use in the park and on the specific trail. The superintendent must provide the public with notice of the availability of the EA and at least 30 days to review and comment on an EA completed under this section.
- (3) The superintendent must complete a written determination stating that the addition of bicycle use is consistent with the protection of the park area's natural, scenic and aesthetic values, safety considerations and management objectives, and will not disturb wildlife or park resources.

- (4) Obtains the Regional Director's written approval of the determination required by paragraph (3) of this section; and promulgates a special regulation authorizing the bicycle use."

This environmental assessment has been prepared in accordance with paragraphs (1) and (2), above. At the conclusion of the environmental assessment process, a decision document will be prepared which must be signed by the Regional Director. If the Regional Director determines that the addition of bicycle use on the East Shore Trail is consistent with the protection of the park area's natural, scenic and aesthetic values, safety considerations and management objectives, and would not disturb wildlife or park resources, then a special regulation would be promulgated that authorizes the bicycle use. The process for promulgating a special regulation is called "rulemaking." The rulemaking process would take several months to accomplish. A description of the complete rulemaking process can be found in appendix A.

In accordance with 36 CFR 4.30 if the Regional Director does not provide written approval of the determination (see paragraph (4), above), then a concise written statement would be included in the project files that states that bicycle use cannot be authorized on the East Shore Trail.

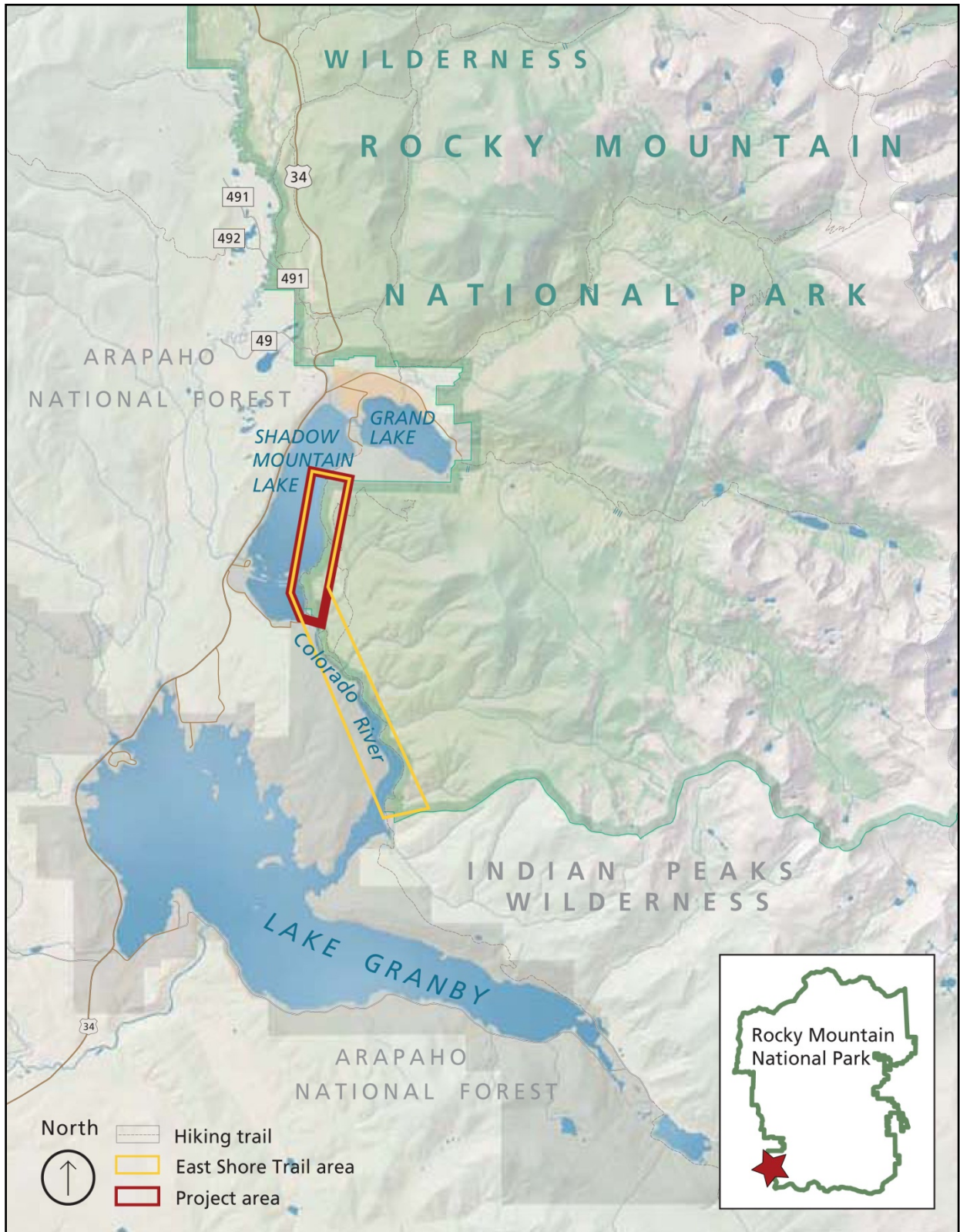


Figure 1: Rocky Mountain National Park and the East Shore Trail Area

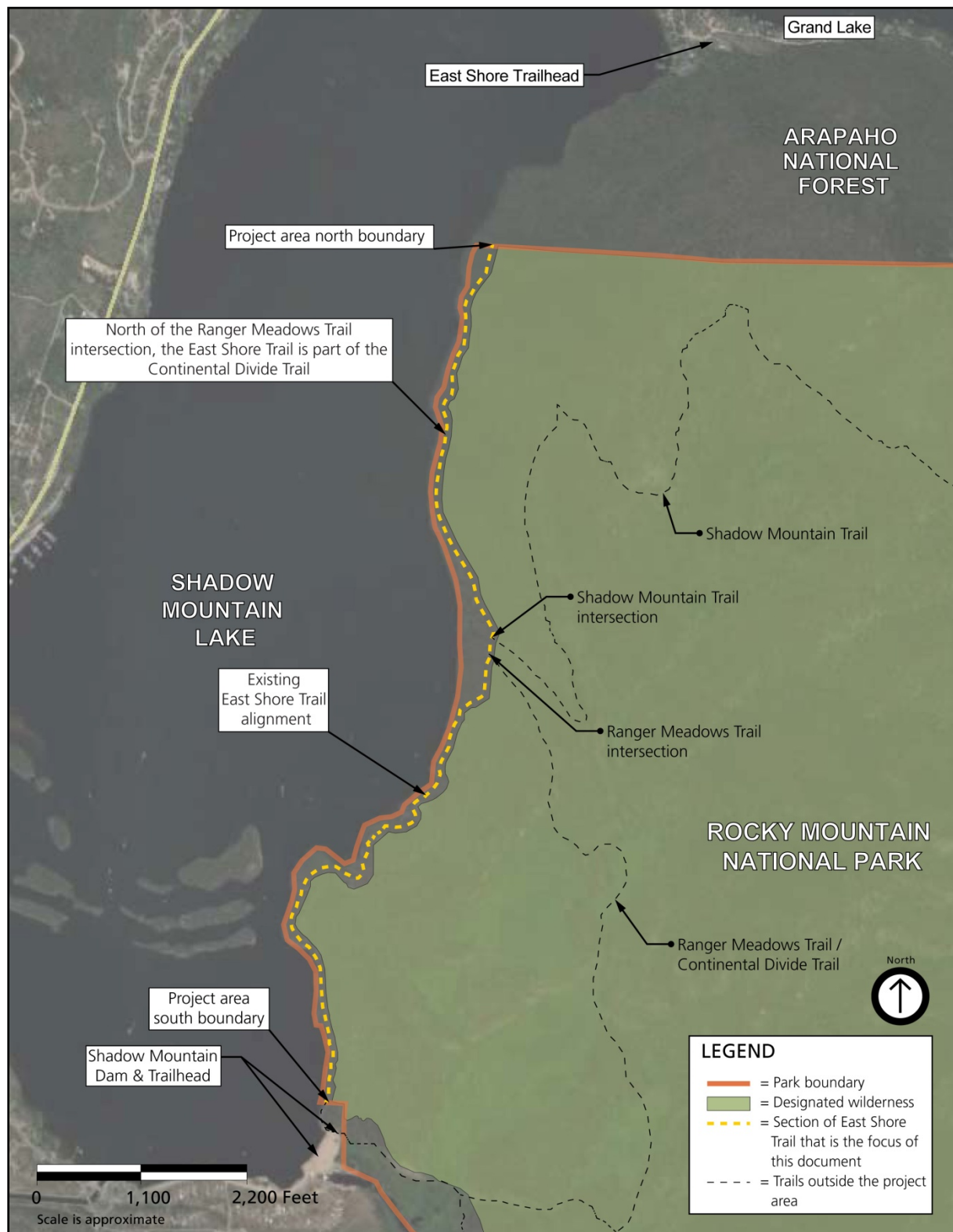


Figure 2: East Shore Trail and Wilderness Boundary

PARK PURPOSE AND SIGNIFICANCE

National park system units are established by Congress to fulfill specific purposes, based on the unit's unique and significant resources. A unit's purpose, as established by Congress, is the foundation on which later management decisions are based to conserve resources while providing "for the enjoyment of future generations."

The purpose and significance of Rocky Mountain National Park and its broad mission goals are derived from its enabling legislation and are summarized in the park's foundation document (NPS 2013). The purpose, need, objectives, and range of alternatives presented in this environmental assessment are grounded in the park's purpose and significance.

Excerpts relevant to planning for the East Shore Trail are provided below.

Establishment

Congress established Rocky Mountain National Park on January 26, 1915. The enabling legislation states (38 Stat. 798)

Said area is dedicated and set apart as a public park for the benefit and enjoyment of people of the United States...with regulations being primarily aimed at the freest use of the said park for recreation purposes by the public and for the preservation of the natural conditions and scenic beauties thereof...

Significance of Rocky Mountain National Park

The Rocky Mountain National Park *Foundation Document* (NPS 2013) describes the significance of the park's resources and values as follows:

1. Rocky Mountain National Park provides exceptional access to wild places for visitors to recreate and experience solitude and outstanding scenic beauty. Trail Ridge Road, the highest continuous paved road in the United States, and the extensive trail system bring visitors to the doorstep of a variety of wilderness-based recreational opportunities.
2. Fragile alpine tundra encompasses one-third of Rocky Mountain National Park, one of the largest examples of alpine tundra ecosystems protected in the contiguous United States.
3. Glaciers and flowing fresh water carved the landscapes of Rocky Mountain National Park. The park is the source of several river systems, including the Colorado River and the Cache la Poudre, Colorado's first and only designated wild and scenic river.
4. The dramatic elevation range within the park boundary, which spans from 7,600 feet to 14,259 feet and straddles the Continental Divide, allows for diverse terrestrial and aquatic ecosystems, varied plant and animal communities and a variety of ecological processes. The park is designated as a United Nations Educational, Scientific, and Cultural (UNESCO) international biosphere reserve and globally important bird area, with portions of the park's montane, subalpine, and alpine ecosystems managed as research natural areas for scientific and educational purposes.
5. The mountainous landscape of Rocky Mountain National Park has drawn people to the area for thousands of years. Visitors can see remnants of the different ways people have used this land over time, ranging from prehistoric big game drives to dude ranching to recreational tourism.

In 1977, Rocky Mountain National Park was recognized as an International Biosphere Reserve. This recognition highlights the significance of the park's natural ecosystems, which represent the Rocky Mountain Biogeographic Province. As an element of the Biosphere Reserve, Rocky

Mountain National Park is part of a network of protected samples of the World's major ecosystem types, devoted to conservation of nature and genetic material and to scientific research in service of man.

In 2001, Rocky Mountain National Park was recognized by the American Bird Conservancy as a Globally Important Bird Area. The purpose of the Important Bird Area designation is to raise awareness among the public, and among land managers, to the importance of each site and its value to bird conservation.

SCOPE OF ENVIRONMENTAL ASSESSMENT

This environmental assessment analyzes the action and no-action alternatives and their impacts on the human and natural environment. It fully describes project alternatives, existing conditions in the project area, and equally analyzes the effects of each project alternative on the environment.

This environmental assessment was prepared pursuant to the National Environmental Policy Act of 1969 (42 U.S.C. 4341 et seq.), as amended in 1975 by Public Law 94-52 and Public Law 94-83. Additional guidance includes NPS Director's Order #12 (NPS 2001) which implements Section 102(2) of the National Environmental Policy Act and the regulations established by the Council on Environmental Quality (40 CFR 1500-1508). The project must comply with requirements of the National Environmental Policy Act as well as other legislation that governs land use, natural resource protection, and other policy issues within the park.

RELATED LAWS, LEGISLATION, AND MANAGEMENT GUIDELINES

Numerous laws, regulations, and policies at the federal, state, and local levels guide the decisions and actions regarding trail planning and development in Rocky Mountain National Park. Some of the primary examples of these legal and regulatory constraints and bounds follow.

NATIONAL PARK SERVICE LEGISLATION AND POLICIES

National Park Service Organic Act (1916)

Congress directed the U.S. Department of the Interior and the National Park Service to manage parks "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (16 United States Code § 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that the National Park Service must conduct its actions in a manner that will ensure no "derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress" (16 United States Code § 1 a-1).

Despite these mandates, the Organic Act and its amendments afford the National Park Service latitude when making decisions that balance visitor recreation and resource preservation. By these acts, Congress "empowered [the National Park Service] with the authority to determine what uses of park resources are proper and what proportion of the park resources are available for each use" (*Bicycle Trails Council of Marin v. Babbitt*, 82 F.3d 1445, 1453 [9th Circuit 1996]).

Courts consistently interpret the Organic Act and its amendments to elevate resource conservation above visitor recreation. *Michigan United Conservation Clubs v. Lujan*, 949 F.2d 202, 206 (6th Circuit 1991) states, "Congress placed specific emphasis on conservation." The National

Rifle Association of America v. Potter, 628 Federal Supplement 903, 909 (D.D.C. 1986) states, "In the Organic Act Congress speaks of but a single purpose, namely, conservation." NPS *Management Policies 2006* (NPS 2006b) also recognizes that resource conservation takes precedence over visitor recreation. Section 1.4.3 states, "when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant."

NPS Management Policies 2006

NPS *Management Policies 2006* (NPS 2006b) establishes service-wide policies for the preservation, management, and use of park resources and facilities. These policies provide guidelines and direction for management of resources within the park. The alternatives considered in the environmental assessment would incorporate and comply with the provisions of these mandates and policies.

Director's Order #12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision-Making

Director's Order #12 (NPS 2011) and the accompanying handbook lay the groundwork for how the National Park Service complies with the National Environmental Policy Act (See 'National Environmental Policy Act, 1969, as Amended' in 'Other Federal Laws and Executive Orders' below). Director's Order #12 and the handbook set forth a planning process for incorporating scientific and technical information and establishing a solid administrative record for NPS projects.

Director's Order #12 requires that impacts to park resources be analyzed in terms of their context, duration, and intensity. It is crucial for the public and decision-makers to understand implications of those impacts in the short and long-term, cumulatively, and in context, based on an understanding and interpretation by resource professionals and specialists.

General Authorities Act of 1970

This act defines the National Park System as including " ... any area of land and water now or hereafter administered by the Secretary of the Interior through the National Park Service for park, monument, historic, parkway, recreational, or other purposes ... " (16 USC 1c[a]). It states that " ... each area within the national park system shall be administered in accordance with the provisions of any statute made specifically applicable to that area ... " (16 USC 1c[b]) and in addition with the various authorities relating generally to NPS areas, as long as the general legislation does not conflict with specific provisions.

Vehicles and Traffic Safety – Bicycles (36 CFR Part 4 RIN 1024-AS97 Final Rule)

This rule amends current regulations for designating bicycle routes and managing bicycle use within park units throughout the National Park System. It authorizes park superintendents to open existing trails to bicycle use within park units under specific conditions, in accordance with appropriate plans and in compliance with applicable law. It also retains the current requirement for a special regulation to authorize construction of new trails for bicycle use outside developed areas.

Rocky Mountain National Park Foundation Document

The foundation document (2013) contains a formal statement of the core mission of Rocky Mountain National Park and provides basic guidance for all planning and management decisions: a foundation for planning and management. The foundation document describes the park's purpose, significance, interpretive themes, fundamental resources and values, and special

mandates and administrative commitments, as well as legal and policy requirements for administration and resource protection.

OTHER FEDERAL LAWS AND EXECUTIVE ORDERS APPLICABLE TO THE PROJECT

National Environmental Policy Act, 1969, as Amended

Section 102(2)(c) of this act requires that an environmental analysis be prepared for proposed federal actions that may significantly affect the quality of the human environment or are major or controversial federal actions. The National Environmental Policy Act is implemented through regulations of the Council on Environmental Quality (CEQ) (40 CFR 1500-1508). The National Park Service has, in turn, adopted procedures to comply with the act and the Council on Environmental Quality regulations, as found in Director's Order #12, and its accompanying handbook (NPS 2001). Section 102(2) (c) of this act requires that an EIS be prepared for proposed major federal actions that may significantly affect the quality of the human environment.

National Parks Omnibus Management Act of 1998

This act (16 USC 5901, et seq.) underscores National Environmental Policy Act in that both are fundamental to NPS park management decisions. Both acts provide direction for articulating and connecting the ultimate resource management decision to the analysis of impacts, using appropriate technical and scientific information. Both also recognize that such data may not be readily available and provide options for resource impact analysis in this case.

National Historic Preservation Act of 1966, as Amended

The National Historic Preservation Act (NHPA) of 1966 (as amended) requires that proposals and alternatives relating to actions that could affect cultural resources both directly and indirectly, and the potential effects of those actions, be provided for review and comment by the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), and the Advisory Council on Historic Preservation. Therefore, the document will be submitted to the appropriate offices for review and comment according to the procedures in 36 CFR Part 800 and delineated in the 2008 Programmatic Agreement signed by the National Park Service, the National Conference of State Historic Officers, and the Advisory Council on Historic Preservation (See "Cultural Resources" section).

Clean Water Act

The Federal Pollution Control and Prevention Act of 1972, commonly known as the Clean Water Act, is the primary federal law in the United States governing water pollution. The purpose of the act is to make our nation's waters "fishable and swimmable" by 1983 by eliminating releases of toxic substances, controlling wastewater and storm water pollution of waterways, and instituting water quality standards and associated permitting systems.

The principal body of law currently in effect is based on the Federal Water Pollution Control Amendments of 1972, which significantly expanded and strengthened earlier legislation. Major amendments were made to the Clean Water Act of 1977 enacted by the 95th United States Congress and the Water Quality Act of 1987 enacted by the 100th United States Congress.

Endangered Species Act of 1973

The Endangered Species Act of 1973 established protection over and conservation of threatened and endangered species and the ecosystems upon which they depend. The act requires

federal agencies to conserve listed species and consult with the U.S. Fish and Wildlife Service when proposed actions may affect listed species or critical habitat (see “Special Status Species” section).

Executive Order 11990 - Protection of Wetlands

This executive order directs federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.

RELATIONSHIP TO PAST, PRESENT, AND FORESEEABLE FUTURE PROJECTS AND PLANS

The National Park Service has developed plans and implemented management actions that could affect or be affected by actions taken and changes in allowable uses along the East Shore Trail. These plans and actions are identified below with a brief description of their potential relevance to the proposed action. These plans and policies are considered in Chapter 3: Affected Environment and Environmental Consequences as part of the cumulative impact scenario that was used for all retained impact topics to determine the additive effects of each alternative in concert with all past, present, and reasonably foreseeable actions.

Public Law 111-11 required the identification of a trail alignment in the park. The U.S. Forest Service has flagged a preliminary alignment for a single track trail in the adjacent Arapaho National Recreation Area. Further planning, compliance, and public involvement would be required before any further action could be taking on altering the use and/or physical character of the trail south of the Shadow Mountain Dam.

The Headwaters Trails Alliance is an IRS 501(c)(3) nonprofit advocacy organization for trails in Grand County, Colorado. Their mission is to identify, maintain, and expand an accessible, interconnecting trail system in Grand County for appropriate multi-user groups. The Headwaters Trails Alliance is currently in the process of updating its 1995 trails master plan. Since one part of the their mission is to interconnect communities in Grand County, it is anticipated that the revised plan would include a multiuse trail connection between Granby and Grand Lake that could, at least in part, utilize the East Shore Trail. At this time, the details of such a trail connection have not been defined, no timetable has been established for making the connection, National Environmental Policy Act compliance has not been initiated, and no funding has been secured. Within the past two years, the Headwaters Trails Alliance and the U.S. Forest Service have flagged a route for a future trail within the Arapaho National Recreation Area that could be included in the larger multiuse trail. A larger, multiuse trail is not part of the action considered in this environmental assessment.

Bark beetles have killed millions of acres of evergreen trees (primarily lodgepole pine) in the western United States and Canada. They have killed thousands of acres of lodgepole pine trees in Rocky Mountain National Park, including extensive areas along the East Shore Trail. The *Bark Beetle Management Plan* (NPS 2005a) describes integrated pest management strategies, including the use of insecticides, to protect high-value trees in some frontcountry areas of the park. No insecticides have been used along the East Shore Trail. Beetle-killed trees that pose a risk to public safety have been removed and will continue to be removed along the East Shore Trail. The proposed project is consistent with the goals of the bark beetle management plan to protect high value healthy trees in developed areas and reduce or remove hazardous trees infested with, or killed by bark beetles.

The Rocky Mountain National Park *Fire Management Plan* (NPS 2012a) is a detailed plan of action for all wildland fire activities, including preparedness, suppression, wildland fire use, fire prevention, fire monitoring, and fuels management activities. The goals in the plan include such concepts as protecting life and property, using a variety of fire management tools, allowing wildland fire to achieve its natural role in the ecosystem, and avoiding unacceptable effects. Activities and changes in allowable uses along the East Shore Trail would not interfere with the management strategies under the fire management plan.

The 3,100-mile Continental Divide National Scenic Trail traverses the spine of the continental United States from Canada to Mexico. Within the project area, the national scenic trail follows the northern 0.9 miles of the East Shore Trail before forking east along the Ranger Meadows Trail. The Continental Divide National Scenic Trail goal is to construct, manage, and preserve a non-motorized public backcountry trail along the full length of the Continental Divide. The effects of allowing bicycle use on the north 0.9 mile of the East Shore Trail in the project area are analyzed in detail in chapter 3 under “Visitor Use and Experience.”

The purpose of the Three Lakes Watershed Association is to protect and improve the quality of life in the area of Lake Granby, Shadow Mountain Lake, and Grand Lake. The association’s activities in recent years have been focused on improving the quality and clarity of the water in both Shadow Mountain Lake and Grand Lake.

Over 100 species of exotic herbaceous plants and grasses occur in Rocky Mountain National Park. Of these, 35 species have been identified as a threat to the park’s natural resources and targeted for control. Trail work and the introduction of new equipment, including bicycles, on to the East Shore Trail could increase the opportunity for the introduction and distribution of invasive plant species in the area. Management of invasive exotic plants before, during, and after actions taken along the East Shore Trail to accommodate bicycle use would follow the protocols included in the *Invasive Exotic Plant Management Plan* (NPS 2003, currently under revision).

The Rocky Mountain National Park *Trails Plan* (NPS 1982) proposes actions to accommodate increased use, alleviate conflicts between hikers and stock users, improve trailheads, and reduce impacts on the natural and cultural environment. These proposals are the result of detailed field studies of all existing park trails and of several potential trail alignments. The overall objective of the plan is to provide diverse recreational opportunities for both hikers and stock users while reducing environmental damage. Within this objective, additional goals of the plan aim to identify the most appropriate hiking and stock use experiences in the park and reduce conflicts between different groups of trail users. The plan also suggested a separation of uses in areas of conflict. The proposed activities and changes in allowable uses along the East Shore Trail would be consistent with these objectives for the various trail users on the East Shore Trail.

The Rocky Mountain National Park Trail System Maintenance and Reconstruction Plan (NPS 2000) is a detailed plan is an update to the original trail plan written in 1982. Under this plan, the National Park Service proposes to correct scattered erosion problems along the East Shore trail network. Proposed methods include filling areas, stabilizing, and constructing the appropriate drainage structures. Correcting these deficiencies is a parkwide priority.

The Rocky Mountain National Park *Commercial Horse Use Management Plan and Environmental Assessment* (NPS 1993) proposes actions to address the primary commercial horse use issues affecting the park. The proposed activities and changes in allowable uses along the East Shore Trail would be consistent with the goals of this management plan to allow for a quality visitor experience via horseback, to preserve and protect the park’s wilderness character, which includes scientific, ecological, recreational, educational, historical, and aesthetic values, and to minimize conflicts between users on the trail.

The *Grand County Headwaters Trails Master Plan* (Grand County 1995, currently being updated) “was developed to direct and promote the organization and preservation of the existing trail

system within Grand County,” “to serve as a guide in the development of an interconnected trail system which will enhance the recreation opportunities for Grand County residents and visitors alike”, and to, “provide high quality paved multi-use, multi-seasonal trails in Grand County which link towns and recreational areas within Grand County.” Viewed as providing a link between Grand Lake and Granby, the Headwaters Trails Alliance has long been an advocate for bicycle use on the East Shore Trail.

SCOPING PROCESS AND PUBLIC PARTICIPATION

SCOPING ACTIVITIES

Scoping is an early and open process to identify and determine the breadth of environmental issues and alternatives to be addressed in an environmental assessment. Rocky Mountain National Park conducted both internal scoping with appropriate NPS staff and external scoping with the public and interested and affected groups and agencies.

Internal scoping was conducted by Rocky Mountain National Park staff, including the Chief of Planning, a Cultural Resource Specialist, and the Trail Foreman, the Colorado River District Trails Supervisor, and the District Ranger on August 27, 2012. This interdisciplinary process defined the purpose and need, identified potential actions to address the need, determined what the likely issues and impact topics would be, and identified the relationship, if any, of the proposed action to other planning efforts at the national park.

A public meeting, attended by 20 people, was held on August 23, 2012 in Grand Lake, Colorado.

American Indian tribes traditionally associated with the western portion of Rocky Mountain National Park, others with whom park staff regularly consult, and the Partnership for the National Trails System were also apprised of the proposed action by letter (see appendix B).

Comments were solicited during external scoping until the end of September, 2012. No comments were received from the tribes. Comments were received from three different agencies and several organizations. In addition, 100 comments were received from individuals. Details regarding these comments are provided in chapter 4, Consultation and Coordination.

AGENCY CONSULTATIONS

Scoping also includes early input from any interested agency or any agency with jurisdiction by law or expertise. As outlined under “Relevant Laws, Regulations, and Policies” above, the National Park Service consulted with the U.S. Fish and Wildlife Service and the U.S. Forest Service.

LOCAL GOVERNMENT INPUT

During the scoping process, the park consulted with and received comments from Grand County and from the Town of Grand Lake.

ISSUES AND IMPACT TOPICS

This section identifies potential project-related issues, the resources, and other values (impact topics) that could be affected by the proposed action and its alternatives. Candidate impact topics for this environmental assessment were identified from internal and public scoping; based on federal laws, regulations, and orders; from NPS guidance such as *NPS Management Policies 2006* (NPS 2006b); and from NPS knowledge of national park resources.

Justifications are provided regarding why there was no need to examine some impact topics in detail. Other impact topics were carried forward for further analysis in chapter 3 of this environmental assessment. .

RETAINED IMPACT TOPICS AND ASSOCIATED ISSUES

For the impact topics that were retained for detailed analysis, issues associated with these topics need to be addressed in the analysis of the proposed actions and alternatives. The issues were identified by the interdisciplinary team and by the public during the public scoping period. Relevant aspects of the issues that were retained are discussed in detail under the appropriate impact topics in chapter 3.

Wildlife

Construction along portions of the East Shore Trail during realignment/redesign could disturb wildlife or their habitats. Additionally, the use of bicycles on the trail may startle large ungulates and/or nesting osprey.

Soils

Construction along portions of the East Shore Trail during realignment/ improvement could disturb soils in spot locations including actions from trail widening, realignment, and minor grading. Mitigation measures would include the use of erosion control. Trail stabilization could also decrease erosion in areas along the trail. The use of bicycles could also affect soils depending on conditions, although it is estimated that impacts from their use would be similar or less than those resulting from stock use that currently occurs on a 0.9 mile portion of the trail.

Vegetation

Clearing and grubbing of trees and shrubs during trail realignment/ improvement would affect the existing vegetation. There is also the potential for minor widening of the trail in certain areas and clearing trailside vegetation to accommodate bicycle use or as a result of their use.

Wetlands

There are several small wetland areas adjacent to the proposed trail alignment. A section 404 permit may be required from the U.S. Army Corp of Engineers to restore abandoned sections of the trail that went through wetland areas.

Visitor Use and Experience

The trail currently has several different user groups including hikers and anglers who use the trail to access the shoreline of Shadow Mountain Lake. There is light stock use. The Continental Divide National Scenic Trail also shares the East Shore Trail for 0.9 miles. There is the potential for user conflicts with the addition of bicycles. There are also benefits to visitors associated with the addition of a new recreation opportunity.

Public Health and Safety

The use of bicycles on the trail would increase the potential for accidents and/or collisions. This potential would be dependent on sight distances and trail conditions, among other things.

IMPACT TOPICS CONSIDERED BUT DISMISSED

This section explains why some impact topics were not evaluated in more detail. Impact topics were dismissed from further evaluation either because the resource does not occur in the area or because implementing the alternatives would have no effect or only a negligible or minor effect on the resource or value. Negligible or minor effects are defined as follows:

- An effect would be negligible if the impact on the resource would be so small that it would not be detectable or measurable.
- A minor effect would be detectable or measurable, but would be of little importance.

Because there would be negligible or minor effects on the dismissed impact topics, an alternative's contribution toward cumulative effects for dismissed topics would be low or absent.

Air Quality

Emissions of particulates that could affect air quality, including visibility in the general vicinity of the project area, could temporarily increase during potential trail realignment and/or stabilization activities as a result of the potential use of motorized equipment at the site and from exhaust from gasoline- or diesel-powered vehicles and equipment. This equipment would also temporarily emit air pollutants. However, activities requiring the use of machinery would not be expected to be long term. Mitigation measures described in more detail in the "Alternatives" chapter (such as dust suppression) would be employed to minimize or avoid potential effects on air quality. Because of the short-term and localized nature of the operation, trail realignment and/or stabilization activities would not affect the attainment status of the airshed that encompasses Rocky Mountain National Park and would not affect the airshed designation. This impact topic was, therefore, dismissed from further analysis.

Climate Change

Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). Recent reports by the U.S. Climate Change Science Program and Intergovernmental Panel on Climate Change (2007a, 2007b) provide evidence that climate change is occurring as a result of rising greenhouse gas emissions and could accelerate in coming decades.

While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected in the future as a result of climate change include hotter, drier summers; warmer winters; warmer water; higher ocean levels; more severe wildfires; degraded air quality; more frequent heavy downpours; and increased drought.

Although some effects of climate change are known or likely to occur, many potential impacts are unknown. Much depends on the rate at which the temperature would continue to rise and whether global greenhouse gas emissions can be reduced or mitigated. Climate change science is a rapidly advancing field and new information is being collected and released continually.

It is not possible to meaningfully link the greenhouse gas emissions of individual project actions to quantitative effects on regional or global climatic patterns. While trail realignment activities could contribute to increased greenhouse gas emissions, such emissions would be temporary and indiscernible at a regional scale. Therefore, the topic was not retained for further analysis.

Ecologically Critical Areas or Other Unique Natural Resources

The proposed action and its alternatives being considered would not affect any designated ecologically critical areas, wild and scenic rivers, or other unique natural resources, as referenced in

the Wild and Scenic Rivers Act, NPS *Management Policies 2006*, 40 *Code of Federal Regulations* [CFR] 1508.27, or the 62 criteria for national natural landmarks. Therefore, the topic was not retained for further analysis.

Floodplains

The proposed action does not involve development in the floodplain or modifications that could adversely affect the natural resources and functions of floodplains or increase flood risks. Therefore, a floodplains statement of findings is not required (Director's Order #77-2).

Water Quality

The following facts describe conditions around the project area:

- The East Shore Trail is located on the east shore of Shadow Mountain Lake. The distance between the trail and the shoreline varies between 18 inches and approximately 340 feet.
- Additional surface waters within the project area include several small seeps/wet areas along the shoreline, four wetland areas (see the "Wetlands" section), and one drainage flowing into the northernmost wetland. The East Shore Trail does not cross any major perennial streams within the project area.
- Because Rocky Mountain National Park straddles the Continental Divide, it contains only headwaters, with no pollution potential from sources occurring upstream.
- Shadow Mountain Lake (which is a manmade reservoir) has the following use classifications which are used by the Colorado Department of Public Health and Environment (CDPHE) to set appropriate water-quality standards; Aquatic Life Cold, Recreation, Water Supply, and Agriculture.
- The surface elevation of Shadow Mountain Lake does not vary by more than one foot.

The primary water quality parameters of concern for Shadow Mountain Lake associated with potential effects of the proposed action and rerouting or construction of new trail segments are water clarity and total suspended solids. These parameters are emphasized because the most likely impacts would occur from trail work being performed in and along the lake shoreline. The majority of the work would not have any impact on water quality because the work zone would be separated from the lake or other surface water and runoff would be controlled using best management practices and mitigation measures.

Relatively recent water quality data are available for Shadow Mountain Lake (Windy Gap Firming Project, Lake and Reservoir Water Quality Technical Report, prepared for U.S. Bureau of Reclamation, Eastern Area Office, Loveland, Colorado, by AMEC Earth and Environmental, Boulder, Colorado, July, 2008) that include measurements of water clarity and total suspended solids.

Based on a preliminary qualitative evaluation of the potential for the proposed action to affect either water clarity or total suspended solids, the likelihood that the action would adversely affect water quality is low. The most likely source of adverse impact would be at the area where the trail is within 18 inches of the lake. Work would require disturbance of sediment immediately adjacent to the shoreline. However, because the area in question is no longer than 15 feet, adverse impacts to water clarity and/or total suspended solids in anything other than a 20-foot radius of the work zone would be negligible. The adverse impacts that would occur would be short-term and conditions would likely return to a pre-impact state within less than one day. Other segments along the trail with proximity to water would be subject to some degree of disturbance, but the potential impacts in these areas would be far less and also would be negligible. Therefore, this topic has been dismissed from further analysis.

Special Status Species

The Endangered Species Act of 1973 requires examination of impacts to all federally-listed threatened, endangered, and candidate species. Section 7 of the Endangered Species Act requires all federal agencies to consult with the U.S. Fish and Wildlife Service to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of listed species or critical habitats. In addition, NPS *Management Policies 2006* and Director's Order #77 *Natural Resources Management Guidelines* require the National Park Service to examine the impacts to federal candidate species, as well as state listed threatened, endangered, candidate, rare, declining, and sensitive species. Neither park records nor field surveys identified any individual species and/or habitat for any of the known special status species with the potential to occur within the vicinity of the project area. The U.S. Fish and Wildlife Service was consulted regarding the potential for yellow-billed cuckoo and Canada lynx to occur within the project area. Of the special status species known to occur within the park, these are the only two land-based species known to occur within Grand County (see appendix C for a list of special status species within Rocky Mountain National Park). The U.S. Fish and Wildlife Service concurred that allowing bicycle use on the East Shore Trail would have no effect on Canada lynx due to the fact that the trail is existing, currently has human use, and the nearest lynx habitat is approximately 2,000 feet to the east of the trail (Gamble pers. comm. 2013b). Additionally, the U.S. Fish and Wildlife Service stated that the primary habitat for the yellow-billed cuckoo is riparian cottonwood, which does not exist along the East Shore Trail (Gamble pers. comm. 2013b). Thus, special status species were not retained for detailed analysis.

Sacred Sites and Ethnographic Resources

According to D0-28 and Executive Order 13007 on sacred sites, the National Park Service should try to protect ethnographic resources – any site structure, object, landscape, or natural feature assigned traditional significance in a cultural group traditionally associated with it. Executive Order 13007, “Indian Sacred Sites,” requires federal land managers to accommodate access to and ceremonial use of Indian sacred sites by Native Americans and to avoid adversely affecting the physical integrity of such sites. Procedures applicable to lands in national parks are defined in part 512, chapter 3 of the *Department of the Interior Departmental Manual*.

Management of ethnographic resources is addressed in chapter 10 of NPS-28: *Cultural Resource Management* (NPS 1998). This identifies ethnographic resources as “variations of natural resources and standard cultural resource types. They are subsistence and ceremonial locales and sites, structures, objects, and rural and urban landscapes assigned cultural significance by traditional users.”

John Brett (of the University of Colorado Denver) in the ethnographic overview for the park (Brett 2003) asked the Ute, Arapaho, Apache, Sioux and other tribes if there were any ethnographic resources within Rocky Mountain National Park. The answer was “No.” Thus, in this study, Rocky Mountain National Park performed all of the ethnographic resource consultation for the entire park. In addition, none of the Arapaho or Ute elders or other tribal members has ever mentioned a resource of concern during their many visits to the park beginning in 1996 (Brett 2003). Moreover, if there were any cultural resources documented (prehistoric, historic, protohistoric, or ethnographic) during a literature review for the project (a National Park Service, state and professionally required procedure) or during field work, they would have been addressed in the reports. Therefore, this topic has been dismissed from further consideration and will not be evaluated further in this document.

Indian Trust Resources

Indian trust assets are owned by American Indians but are held in trust by the United States. Requirements are included in the Secretary of the Interior's Secretarial Order 3206, "American Indian Tribal Rites, Federal-Tribal Trust Responsibilities, and the Endangered Species Act," and Secretarial Order 3175, "Departmental Responsibilities for Indian Trust Resources." No Indian trust assets occur within Rocky Mountain National Park. Therefore, there would be no effects on Indian trust resources resulting from any of the alternatives. Therefore, the topic was not retained for further analysis.

Cultural Landscapes

According to the NPS' *Cultural Resource Management* (NPS 1998) guideline, a cultural landscape is

a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions.

According to the NPS cultural landscapes inventory database, no cultural landscapes have been identified within the project area. Therefore, cultural landscapes were dismissed from further analysis.

Cultural Resources

Impact analysis for cultural resources is intended to comply with the requirements of both the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. The National Environmental Policy Act requires analysis of the impacts of federal actions on the human environment (the natural and physical environment and its relationship with human culture) and directs that these important historical, cultural, and natural aspects of our national heritage be preserved. Impacts on these aspects are considered in terms of type, context, duration, and intensity, which is consistent with the regulations of the Council on Environmental Quality that implement the National Environmental Policy Act. Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their undertakings on resources listed or potentially eligible for listing in the National Register of Historic Places (i.e., historic properties). All actions affecting the parks' cultural resources must comply with this legislation. Assessment of potential effects to cultural resources is conducted in accordance with the Advisory Council on Historic Preservation's regulations implementing Section 106 of the NHPA (36 CFR Part 800, *Protection of Historic Properties*).

Although the project is a federal action, the National Park Service determined that implementation of the action alternative does not constitute an "undertaking," as defined in §36 CFR 800.3(a), because it has no potential to cause effects on cultural resources.

Efforts to identify cultural resources in the project area included archival research, literature review, and field surveys conducted in 2002 (Brunswig 2005) and September 2012. Archeological resources and historic structures, including some that could be eligible for listing in the National Register of Historic Places, were identified in the vicinity of project area but were not in the area of potential effect and therefore the project is not anticipated to have an effect on these resources.

The project would involve only minor improvements to a two-mile segment of the existing East Shore Trail, which is approximately 2 feet wide. No cultural resources are located within the areas proposed for any ground disturbing/clearing activities and therefore there would be no potential impacts to cultural resources. Additionally, no staging areas or haul routes for equip-

ment or materials are proposed for areas containing cultural resources. Materials used for the construction of the bog bridge (stone) and causeway (road base and other material) through wetlands would be imported from off-site locations and delivered along the shore of Shadow Mountain Lake via flat-bottom boat. No materials would be obtained from local sources to avoid the potential for inadvertent disturbance to stone features in archeological sites. During construction, mitigation measures would be followed, as described in the mitigations section. These would ensure appropriate protection of resources that may be identified while trail construction is underway.

No alterations to the historic character of park resources or other aspects of integrity that could make any park resource eligible for the National Register of Historic Places are anticipated during the temporary construction and the subsequent use. All work would occur only to the East Shore Trail alignment and would not occur on the National Register of Historic Places-listed Shadow Mountain Trail which connects to but does not share an alignment with the East Shore Trail. For these reasons, cultural resources were dismissed from further detailed consideration in this environmental assessment. The Colorado State Historic Preservation Officer will receive a copy of this public document and given the opportunity to provide any comments regarding cultural resources during the public review period.

Museum Collections

Museum collections (prehistoric and historic objects, artifacts, works of art, archival material, and natural history specimens) would be unaffected by the implementation of either alternative. The park's museum collections would continue to be acquired, accessioned/cataloged, preserved, protected, and made available for access and use according to NPS standards and guidelines. Therefore, museum collections were dismissed as an impact topic.

Wilderness

A recommendation to officially designate much of Rocky Mountain National Park as wilderness was first submitted to Congress by President Nixon on June 13, 1974. Since then, no action was taken that would diminish the wilderness suitability of the area recommended for wilderness study or for wilderness designation until the legislative process was completed. The Omnibus Public Lands Management Act of 2009 (Public Law 111-11) designated nearly 95% of the park as wilderness. The wilderness area contains 249,339 acres. The wilderness area includes most of the park's undeveloped lands. Wilderness in Rocky Mountain National Park is currently managed under the *Backcountry/Wilderness Management Plan* (NPS 2001).

The wilderness legislation excluded the East Shore Trail Area from wilderness to "maximize the opportunity for sustained use of the trail without causing harm to affected resources or conflicts among users." Consideration of bicycle use on the East Shore Trail was part of the Public Law 111-11 legislation. The designated East Shore Trail Area is outside of the wilderness area and includes a strip of land along the west boundary of the park south of Grand Lake. No proposed actions under this project would take place within the designated wilderness area and bicycle use is prohibited within designated wilderness. If bicycle use is permitted on the East Shore Trail, and if illegal incursions into wilderness occur, bicycle use could be suspended or revoked in order to protect wilderness values. Because the East Shore Trail area is not located within the designated wilderness and mitigation measures have been designed to protect wilderness values, this impact topic was dismissed from further analysis.

Geology

The East Shore Trail is underlain by poorly consolidated glacial or alluvial deposits. Bedrock blasting should not be needed to complete trail realignment and/or stabilization activities to allow for bicycle use. This near-surface project would not alter any geologic features, and site ge-

ology would not affect implementation of the project. Therefore, geology was dismissed from further consideration.

Energy Requirements and Conservation Potential

The National Park Service reduces energy costs, eliminates waste, and conserves energy resources by using energy-efficient and cost-effective technology. Energy efficiency is incorporated into the decision-making process during the design and acquisition of buildings, facilities, and transportation systems that emphasize the use of renewable energy sources. Under any alternative, the National Park Service would continue to implement its policies of reducing costs, eliminating waste, and conserving resources by using energy-efficient and cost-effective technology (NPS 2006b). The proposed alternatives would not appreciably change the park's short- or long-term energy use or conservation practices. The fuel used during trail realignment and/or stabilization activities would not result in detectable changes in energy consumption at a local or regional level; therefore, this impact topic was dismissed from detailed evaluation.

Environmental Justice

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. Guidelines for implementing this executive order under the National Environmental Policy Act are provided by the Council on Environmental Quality. According to the U.S. Environmental Protection Agency (1998), environmental justice is

The fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. The goal of this "fair treatment" is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts.

Residents within the surrounding communities of the park are not disproportionately minority or low-income. Consideration to allow bicycle use and the associated proposed activities along the East Shore Trail would not disproportionately affect low-income or minority populations. Therefore, this topic was dismissed from further consideration.

Night Skies

Because and trail realignment and/or stabilization activities to allow for bicycle use would occur during the day, it would not affect the visibility of night skies. No lighting would be used or installed along the East Shore Trail and therefore this impact topic was dismissed from further analysis.

Prime and Unique Agricultural Lands

Prime farmland has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops. Unique land is land other than prime farmland that is used for production of specific high-value food and fiber crops. Both categories require that the land is available for farming uses (Council on Environmental Quality 1980). The map of prime and unique agricultural lands and other high-quality prepared by the American Farmland

Trust (2002) indicates that these high-value resources do not occur in Grand County, Colorado where the East Shore Trail is located. Therefore, this impact topic was not evaluated.

Soundscapes

An important part of the NPS mission is to preserve natural soundscapes. During trail realignment and/or stabilization activities to allow for bicycle use, sounds from equipment and work crews would increase. Best management practices would be employed during these activities to minimize noise. Sounds generated from trail realignment and/or stabilization activities would be temporary, lasting only as long as the activity was occurring.

In the long-term, the use of bicycles on the East Shore Trail would not measurably increase sound levels from those produced by foot and stock use on the trail. Adverse trail realignment and/or stabilization activity-related effects on soundscapes would be minor or less in intensity. Therefore, this topic was dismissed from further analysis.

Socioeconomics

Section 1508.8 of the Council on Environmental Quality (1978) guidelines for implementing the National Environmental Policy Act establishes that “effects” include “ecological, aesthetic, historic, cultural, economic, social, or health.” However, section 1508.14 clarifies that economic and social effects need to be considered only when they are interrelated with natural or physical environmental components regarding effects on the broader “human environment.”

Socioeconomics were eliminated from detailed consideration because the alternatives would involve only negligible potential changes in the economic and social conditions of Grand County (or elsewhere) over the life of the project.

During trail realignment and/or stabilization activities to allow for bicycle use, some visitors could avoid the area because of perceived reductions in experience quality and could choose recreation alternatives outside of Grand County. A small percentage of the park’s total visitors travel in the project area. A loss of these visitors and their expenditures within Grand County would represent, in the worst case, no more than a short-term, minor, adverse impact on the economy of Grand County.

The presence of bicycles on the East Shore Trail could cause some stock users or hikers to avoid using the trail. However, due to the availability of other trails in the area and the fact that the allowance of bicycles on the trail could attract additional users to the East Shore Trail, the difference of visitors and their expenditures within Grand County would be no more than minor or less in intensity. Therefore, this impact topic was dismissed from further analysis.

Natural or Depletable Resource Requirements and Conservation Potential

As directed by *NPS Management Policies 2006* (NPS 2006b), the National Park Service strives to minimize the short- and long-term environmental impacts of development and other activities through resource conservation, recycling, waste minimization, and the use of energy-efficient and ecologically responsible materials and techniques. Although energy and construction materials would be used for trail realignment and/or stabilization activities under the action alternative, none of the proposed alternatives would change the park’s overall energy consumption, use of nonrenewable (depletable) resources, or conservation potential. Thus, this topic was eliminated from further analysis.

Possible Conflicts with Other Land Use Plans and Policies

The proposed project would not interfere with plans or policies of Arapaho and Roosevelt National Forests, Arapaho National Recreation Area, Shadow Mountain Lake, or other park

neighbors. The *Continental Divide National Scenic Trail Comprehensive Plan* (2009) states that “bicycle use may be allowed on the Continental Divide National Scenic Trail (16 United States Code (U.S.C.) 1246(c)) if the use is consistent with the applicable land and resource management plan and will not substantially interfere with the nature and purposes of the Continental Divide National Scenic Trail.” Some concern has been expressed regarding the potential for conflict between the use of bicycles on the 0.9 miles of the East Shore Trail that is shared with the Continental Divide National Scenic Trail in the project area and the nature and purposes of the Trail. The Headwaters Trails Alliance and the Continental Divide Trail Coalition recently entered into an agreement that includes site-specific management actions in order to prevent substantial interference with the nature and purposes for which the Continental Divide National Scenic Trail was created. In addition, the adaptive management strategies that are including in this environmental assessment (please refer to the adaptive management section and table 1) have been developed specifically to prevent substantial interference with the nature and purposes of the Continental Divide National Scenic Trail. While visitor use and experience has been retained for further analysis in this document, the topic of “possible conflicts with other land use plans and policies” is dismissed from further consideration because the actions contained in the agreement between the Headwaters Trails Alliance and the Continental Divide Trail Coalition, and the actions contained in the NPS adaptive management strategy will avoid substantial interference with the nature and purposes of the Continental Divide National Scenic Trail.