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January 11, 2011

Corbin L. Newman, Jr.
Regional Forester, Southwestern Region
333 Broadway SE
Albuquerque, NM 87102

Dear Regional Forester Newman:

We write on behalf of our clients the Trails Preservation Alliance (“TPA”) and Colorado Off-Highway Vehicle Coalition (“COHVCO”) (collectively “the Recreation Groups”). The Recreation Groups are active stakeholders in recreation planning for New Mexico National Forests. While our members enjoy a wide range of recreational activities and modes of access, we are particularly concerned with proper recognition and continuation of quality single-track trail riding opportunities. We are concerned that Forests in New Mexico (and beyond) properly disclose and analyze a full range of recreational opportunities in travel planning, including those under special use permits.

Our concern develops in response to the potential overlap between two pending analyses in the Carson Forest, Questa Ranger District. The Forest is proposing to authorize expansion of the Taos Ski Valley under its 2010 Master Development Plan and make associated changes to its special use permit which will include addition of mountain biking trails. The Forest has indicated that a NEPA document will be released addressing travel management on the Questa Ranger District. It is essential that the nature and extent of motorized and nonmotorized trail riding mileage be accurately portrayed in the alternatives and analyzed by the interdisciplinary team.

During our involvement in the Gunnison (CO) National Forest Travel Management Plan and associated environmental impact statements (“the GNF TMP”) we learned that single-track trails are a highly prized but scarce recreation resource and that allocation of motorized/nonmotorized single-track opportunity is a thorny issue. Given the paucity of quality single-track miles it is critically important that each mile be thoroughly analyzed, properly understood and accurately portrayed to the reviewing public. The public cannot properly evaluate and comment upon the diversity of recreation opportunity, nor can agency specialists properly analyze and allocate opportunities without considering this information. The range of information needed includes motorized and nonmotorized recreation opportunities, including

specific vehicle types or seasons of use, on lands within and adjacent to the project area, including other ranger districts, under special use permit, and on lands outside of Forest Service jurisdiction.

In the GNF TMP a meaningful number of mountain bike only trails within the permitted Crested Butte Ski Area were not considered in the analysis. Whether by design or coincidence, the result was to skew the allocation of single-track outside the Ski Area in favor of exclusive nonmotorized (mountain bike) use. We wish to avoid this mistake again, which potentially looms given the proposed expansion of boundary and mountain bike trail network associated with the Taos Ski Valley special use permit.

The Recreation Groups are strong supporters of a diversity of recreational opportunities in the National Forests, including ski areas, backcountry skiing, mountain biking, and motorcycle riding. However, we wish to be firmly on record with several important principles concerning the analysis and allocation of these opportunities. First, we urge the Service and the Carson to recognize the principle of shared use, and to see through the tactic of many sadly-intolerant users who will claim that exclusive nonmotorized (or nonmechanized) access is the only acceptable solution to alleged resource issues or even more evanescent and subjective perceptions of "user conflict." It is entirely valid for those seeking solitude, self-reflection, danger, psychospiritual escape or whatever other experience without motors or gears to look for a setting in the National Forest System, but it is not valid for them to use these primarily ideological requirements to exclude others who are likely greater in number and have equally legitimate interests in use of the public lands. There is an extensive network of formally-designated wilderness that provides them ample publicly-owned, publicly-managed and often free country to explore.

Second, we urge the Forest to accurately disclose and consider in the analysis the nonmotorized recreational opportunity that is (or foreseeably may be) available on the Taos Ski Valley or other areas adjacent to the project area. This request is not only logical but necessary should the Forest wish to properly address its duty to disclose and consider cumulative effects to the human environment.

Finally, we note that an essential ingredient in any recreation or trail management recipe is a commitment to active and effective management. There is no magic formula which can be announced by administrative edict and then ignored. Recreation management implies ongoing human use, and humans are notoriously curious, unpredictable, and at least occasionally irrational. Effective mapping, signage, user outreach, trail construction/maintenance, and enforcement are but a few of the elements that must be included in the Questa District (or any) plan if it is to succeed. As we have done elsewhere, the Recreation Groups are committed to assisting the Carson in achieving a reasonable balance and, to the extent appropriate and possible, in addressing these ongoing management needs.

We appreciate your attention to these concerns and look forward to participating in the

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upcoming and continuing planning process.

Sincerely,

MOORE SMITH BUXTON & TURCKE CHARTERED

/s/ Paul A. Turcke

Paul A. Turcke

cc: Don Riggle, TPA
BlueRibbon Coalition
American Motorcyclist Association