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United States Forest Service Attention: Charles Sharp, NEPA Planner 100 Main Street, PO Box 158 Walden CO 80480

Sent via Email: comments-rm-medicine-bow-routt-hahns-peak-bears-ears@fs.fed.us

Re: Buffalo Pass Trails Project

Dear Mr. Sharp:

These comments are submitted by Timberline Trailriders, Inc. ("TTR"). TTR is not for profit corporation comprised of over 100 families who are off road motorcycle enthusiasts. We have a long history putting on motorcycle competitions, including the Timberline Enduro which was held on Routt National Forest lands for nearly 25 years. More recently, we have successfully partnered with the Hahn's Peak District in obtaining trail improvement grants for the last eighteen years and have secured funding for the Routt NF OHV Trail Crew the last fifteen years.

Our comments on the Buffalo Pass Trail Project are as follows:

- a) At the outset we pleased that the Forest Service, after over thirty years of stagnation, is at last considering the possibility of new single track trails, close to town no less. We support new single track trails on the Forest provided they are true multiple use trails, open to hikers, horses, bicycles and off road motorcycles. Back country single track trails are not expensive to install or maintain, provide quality recreation for a multitude of users and impose minimally on the ecosystem/environment.
- b) We request that all new trails on Buffalo Pass be open to motorized use. For trails that cannot be opened to motorized use at the present time due to the Forest Plan prescriptions, we would request that the decision allow the trails to be open to motorized use should the Forest Plan designation be changed to allow such use. We hate to get into a chicken and egg situation where we're turned down now because of the Forest Plan and turned down on a Forest Plan amendment because the Project decision did not allow motorized use. Please have the plan accommodate possible changes in the Forest Plan designations.
- c) Bicycles have a great amount of trail opportunities close to town on Emerald Mountain and on the Ski Area, both areas being closed to motorized use. There

seems to be no justifiable reason to create another exclusive area primarily for bicycles only. Forest Service trails should be open to all appropriate uses except in those few situations when there is clear and convincing justification for less than all. The preferred proposal here is severely biased against motorized use, with 4 miles to motorized use and 40 miles to non-motorized. This seems to indicate that the primary users are bicycles and the motorized users are lucky to have a little bit of the fun. And if we start on roughly 10% of new trail system being motor friendly, we presume the bike folks will come to expect that as the norm, not the exception. We believe that the starting point should always be 100% multiple use and having a reduction in motorized trails only for good solid planning reasons. We see no good reason to arbitrarily close 90% of the new trails to motorized use.

- d) If all the trails were truly multiple use and open to motorcycles, enforcement issues would be far fewer as all trails would have the same restrictions so users wouldn't have to worry about which trail is open to their use. With only some open to motorized use, signage and users following signage becomes critical. Errant rides would encourage conflict with other users who think their area was free of other uses. It would be much easier and more efficient to put up a nice kiosk/sign at Dry Lake explaining that the Buffalo Pass trail system is multiple use and expect to encounter other user groups on the trails. If you don't want to encounter motorcycles go to the Emerald Mountain bicycle park. If you don't want to see dogs, horses and hikers, go to the ski area.
- e) Providing more multiple use trail will reduce motorcycle density and reduce "user" conflict. And more trail will spread out and minimize trail wear and tear. We're very concerned that a 4 mile section of trail will unreasonably concentrate all motorized users on one short trail. And they have to use the same trail coming down as going up.
- f) If all the Buffalo trails were motorized, how simple it would be for the OHV Trail Crew to maintain them for a couple of days and be done. Or if a batch of trees blew down they could rapidly deal with the problem on a as-needed basis. As proposed, you will have the motorized crew doing one trail and a non-motorized crew doing other trails if there is such a thing. Certainly not very efficient and it would be a poor use of our OHV Trail Crew.
- g) No mention is made as how the new trails will be improved or maintained. It is our understanding that there is no formal system in place under the bicycle umbrella that can reasonably guarantee future maintenance. Future maintenance can only be guaranteed if the trails are open to motorized use and then the maintenance can be handled by OHV Trail Crew as has been done on motorized trails in the District for the last 15 years.
- h) TTR proposed or requested an off road route to allow motorcycles to avoid the Buffalo Pass Road way back in 1993. We feel the heavy car traffic on the road

does not provide a safe and entertaining experience for motorcyclists. One or more off road trails would provide a great option and avoid the dangers of sharing a dusty road with cars.

- i) For some motorcyclists, off road trail options up to the top of Buffalo Pass would be only the beginning of dual sport ride. One could connect to the Grizzly Helena going north or 1101 going south. Having multiple trails to the top would create more interesting trips by a long shot.
- j) We tend to think the majority of the motorized users would be locals looking for a trail riding experience closer to town. Currently, the closest motorized single track trail opportunity is north of Steamboat Lake, over 30 miles away from Steamboat. Four miles of new motorized trail does not come close to addressing the demand for motorized single track trails close to town. Motorized use has long been recognized as a legitimate use of Forest Service lands. This plan must be modified to include much greater opportunities for motorized users.
- k) If motorized use of a small segment trail is blocked by the wrong Forest Plan prescription, consider re-routing the trail out of that zone and into motorcycle friendly areas. In other words, don't let a quarter mile section kill possible motorcycle use of a 10-15 mile trail.
- I) A 40 mile trail system on Buffalo Pass would not in itself become a motorcycle destination so we don't think designating all new trails as open to motorcycles would bring in a large number of out of town users. It might be a nice new diversion to visitors seeking a half day ride before heading home, etc. More like the Slickrock trail system in Moab. The largest user group would be locals looking for a fun half day or couple of hours.
- m) Opening only a single trail would mean motorcycle users would be likely to ride the trail up and then, having nowhere to go, turn around and ride it back down. The hikers or horses they passed on the way up would have to be passed again. Their 8 miles of trail riding would be beating up the same 4 mile trail.
- n) As we've earlier proposed, one trail option not present on the Project materials would be to use the old power line roads to provide motorized access to the top of Buffalo near the 1101 parking lot. This should be incorporated into the final plan. A bridge or low water crossing will probably be required and TTR will gladly assist in that endeavor.
- o) A short 4 mile trail is poor planning. A minimum plan should provide a motorized loop from the Dry Lake areat to the top Buffalo Pass. This could be incorporated into more loop opportunities using the existing 1101 and new trail on the eastern slope (the Grizzly-Helena expansion that's been discussed or a new trail from Percy Lake). Loop trails disburse users and provide a much more enjoyable experience for users.

- p) We believe it would be better to start with greatest amount of new trails open to all users, including motorcycles. Then, down the road if problems develop, selective closures or other remedies could be considered and implemented if conditions warrant. It's always harder to open closed trails than to close opentrails. One forest in Montana has an odd/even day system for motorcycle/bicycles. There are a lot of options to consider short of closure. But let's start with the most open trails possible.
- q) If you find it necessary to limit the newly designated trails that are open to motorcycles to a single trail, please consider making this trail closed to bicycles. Why are motorized trails always open to other users? If a bicycle only trail is justifiable, why isn't a motorcycle only trail? Fair is fair.
- r) With potentially high usage of the trails, we would recommend that all Buffalo Pass trails remain at the primitive end of the spectrum. More open trails will result in greater speeds for both bicycles going down and motorcycles going either direction which sounds like a bad plan for all. And the more open the trail, the more inviting it looks to ATV's and side by sides. And higher speeds for bicycles will create havoc for interactions with horses and hikers (who can't hear them coming).
- s) We agree that bicycles should have to stay on designated trails. Motorized use has been subject to this for many years and there doesn't seem to be the outlaw trail problem that you've found with bicycles.

So, we ask that you maximize the number of new trail miles that are open to motorcycles. If there are good, well supported reasons, consider a small reduction or imposing creative ways to address the perceived problems short of closures. Chopping off 90% at the outset seems like the wrong first step. And if reductions are deemed to be warranted, leave the motorized users with a loop system at the minimum. While a single trail is better than we have now and would be certainly welcomed, we think good planning can provide for more.

Timberline Trailriders, Inc.

Robert H. Stickler, President