TIMBERLINE TRAILRIDERS, INC. P.O. Box 771794 Steamboat Springs CO 80487

Hahns Peak-Bears Ears Ranger District Attn: Mad Rabbit Trails Project 925 Weiss Drive Steamboat Springs, CO 80487

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

Dear Sir or Madam:

Timberline Trailriders, Inc. ("Timberline") is a local not-for-profit corporation comprised over 100 individuals and families who enjoy motorcycle trail riding, especially on federal lands. We have supported and partnered with the Hahn's Peak District (the "District") for over 40 years. We were one of the first clubs to receive grants from the State Trails Committee motorized trail fund and were the only club to receive Good Manager status for the OHV Trail Crew grants. To date, over \$1,500,000 has been provided to the District for use on motorized multiple use trails for maintenance and trail improvement projects.

Timberline elected to not formally object to the Buffalo Pass bicycle projects as District personnel indicated that was the end of specialized planning projects primarily for bicycle users. Seeing the Mad Rabbit proposal proved that representation to be false. We strongly oppose the Mad Rabbit proposal and request that it be withdrawn immediately.

On many occasions over the last 10-15 years Timberline has requested the District engage in a travel management review of the Rabbit Ears Pass area with the goal of providing diverse recreational opportunities to the public that could be easily accessed from US Highway 40. Timberline requested that the District consider utilizing the many miles of existing logging roads to provide four and two wheeled motorized trail opportunities. The hope was to reasonably use the forest along the highway corridor to take pressure off the primary motorized recreation area north of Hahn's Peak. It also makes sense to utilize the several large parking areas initially provided for winter snowmobiling users.

While the District purview is generally west of the Continental Divide and north of U.S. Highway 40 it was requested that the travel management review include the portions of the Parks and Yampa District in the Rabbit Ears Pass area so a complete and thorough travel management plan could be reviewed and adopted. This is the course the District should pursue instead of pursuing the wish list of a single user group.

Among our concerns about this proposal are the following:

1. The District must fully disclose the extent the City has purchased its way to the top of the District's planning agenda. Rumor has it that the 2A funds are fully funding the lead

District employee responsible for this proposal, Kent Foster. Shouldn't the public be made aware of exactly what are the financial entanglements between the City and the District so we can judge whether the current District staff can fairly and reasonably consider planning proposals. Please shine the light of disclosure on all of the financial deals between the City and District and consider whether certain biased employees should cease involvement in planning projects due to this bias.

- 2. The default starting point for any review of recreational trails must be true multiple use single track which is open to hikers, horses, bicycles, e-bicycles and motorcycles. When the District starts off with a proposal that restricts trail access to one user group it fails in its purpose to be a fair and equitable land manager.
- 3. Lands along the highway 40 corridor are not remotely lands with wilderness characteristics or can argued to be eligible for the quiet use crowd. Truck traffic noises travel thousands of yards from the highway and should make motorized trails more than appropriate.
- 4. For many years the old highway was open to jeeps and motorized uses. It was closed for unknown reasons. It would seem that this old right of way would make an appropriate trail for motorized users, keeping trail traffic off the highway. Again, the default starting point on any new trail discussions should be true multiple use, including motorized users.
- 5. To propose a highly dense bicycle trail system goes against the preferred trail layout for our forest lands. Trails should be disbursed and consistent with the remoteness of the lands. The proposed trail system is reminiscent of the density of trails on Emerald Mountain where remoteness certainly never comes to mind.
- 6. It seems that once again the bicycle crowd is pushing for a majority of trails to be "gravity" or coasting trails. This user group has proven to be very poor at sharing multiple use trails. They silently blast down trails surprising other users and wildlife with no warning. They generally show no courtesy to other users creating conflict where none should exist. The most logical management decision should make bicycle traffic **uphill only** on these trails.
- 7. The trail density and predominance of gravity trails seems to resemble the Buffalo Pass planning. What the District completely ignores is the dramatic increase in car traffic to serve the bicycle users. Like river runners, gravity bikes shuttle cars to one end and when done, run cars up and down the access roads. Thus for each user, there will be many car trips up and down the access roads. And this requires large parking lots, something missing here.
- 8. The trail density proposed necessitates complex and expensive trailhead facilities at the top and bottom of the trail system. This includes restrooms for visitors. And an income stream to pay for maintenance and restroom servicing. The City funds will soon expire and there is no fund that can reasonably be expected to cover these costs.

- 9. Proposing a dense trail system in roadless areas and in areas where motorized use in prohibited under the Forest Plan where the District knows that a growing percentage of bicycle users are using some sort of electric assist is a fraud on the planning process. Any electric motor moves a bicycle to a motorized vehicle making their use limited to trails open to motorized vehicles. The District must show that it is enforcing the applicable rules. This should include appropriate signage and in the case of high density bicycle areas, such as proposed or as Buffalo Pass, the plans should include a daily patrol to enforce rules. This could easily cost over \$100,000 per year, funds which are not available or proposed.
- 10. Gravity users also tend to bring materials onto the Forest to create jumps and other amusement park like features. Clearing of these trespassers by a regular maintenance crew should be required and a funding stream provided
- 11. Creating another bicycle "amusement park" should also address the ability of ambulance or search and rescue to reasonable access the trail system for prompt extrication of injured riders. This does not seem to be addressed.
- 12. Our sick and dying forest results in trees regularly falling all year long. To maintain a safe and reasonable trail system, the proponents should provide adequate funding for maintenance. Motorized users have a proven track record of funding maintenance on motorized trails, while the bicycle and other non- motorized users have not. The answer is to limit new trails to those open to motorized use and thereby the motorized trail crews.
- 13. A high density gravity oriented trail system requires large parking areas, restrooms, patrols and the prohibition of other users traditionally allowed on bicycle trails. It seems that the gravity already have such an area and it's in place and operating The Steamboat Ski Area. Gravity use should be limited there and not encroach on other portions of the Forest.
- 14. Again, a highly dense trail system for primarily bicycles will result in the clearing out of wildlife in the area. Bicycles are one of the most frightening things to wildlife based primarily on their stealthy and rapid approach. A dense system will result in regular disruptions to wildlife as against a disbursed trail system which would only intermittently disturb wildlife.
- 15. The proposal should also include seasonal closures to protect wildlife and provide hunters the historical access and success they traditionally have enjoyed.
- 16. Given the growing popularity of winter mountain bike use, the proposal should also consider winter travel and as stated above consideration of ebikes on nonmotorized trails.
- 17. Given that the District does not control planning in the Yampa and Parks Districts, the proposal is also fraudulent in implying trails south of US 40 or east of the continental divide will ever be approved.

- 18. You claim your proposal incorporates suggestions submitted by users at the Charrette and otherwise. We attach what we submitted shortly after the Charrette held in 2014 and would ask why the bulk of our suggestions for the Rabbit Ears Pass area were ignored?
- 19. We incorporate by reference the comments jointly submitted by the Trails Preservation Alliance, Colorado Off Highway Vehicle Association and the Colorado Snowmobile Association.

Please withdraw this poorly thought out and biased proposal and after reasonable diligence proceed with a travel management study along both sides of the U.S. Highway 40 corridor on Rabbit Ears Pass. All Forest users deserve to have their chosen uses considered and incorporated in any District plan proposals. A paid for single user proposal is an affront to non-biased land use planning.

Sincerely,

Timberline Trailriders, Inc.

/s/

By:

Robert H. Stickler, President.