



August 31st, 2016

Ms. Elaine Kohrman
Forest Supervisor - Cibola National Forest
2113 Osuna Road NE
Albuquerque, NM 87113

Dear Ms. Kohrman,

Please accept this comment letter from the International Mountain Bicycling Association (IMBA) regarding the Forest Plan Revision process for the Cibola National Forest. Two of our northern New Mexico chapters (Gallup Trails and Albuquerque Mountain Bike Association) also support the comments made in this letter. Specifically, this letter pertains to the Draft Plan Alternatives, and provides comment directly on several of those Alternatives. Upon attending a public meeting in Gallup, NM on July 25th, 2016; reviewing the associated documents, including Alternatives A-E; and gathering information from local mountain bike advocates we have developed this comment letter to highlight our requests pertaining to mountain bike access. We do not currently have a preference for any one Alternative in its entirety and we understand that each of the Alternatives, (including Alternative B, the USFS Proposed Action) are subject to change via public comment, with the final drafts being released in early 2017. Instead of supporting any specific Alternative, we wish to offer suggestions on several of them as specific feedback on how components of these alternatives impact mountain biking interests. Please note that these comments are based only on Alternatives, A-E, and we are neutral on any component that we do not comment on.

Alternative B

- *Magdalena Ranger District* - there are currently mountain bike accessible routes between the Apache Kid and Whittington Wilderness areas. We request that the recommended Wilderness parcel labelled D3_ADJ8 in the San Mateo Mountains should not extend as far north, as this would constrict east-west mountain bike passage between the existing Wilderness areas. Instead it should only extend as far north as the most northerly point of the existing Apache Kid Wilderness

boundary. Parcel D3_ADJ8 also contains TR31, TR63, TR43, TR69 which should not be negatively impacted due to any additional management prescriptions.

- *Magdalena Ranger District* - in the Datil Mountains/Sawtooth area the recommended Wilderness (parcels D3_5K10 & D3_5K11) should be removed from recommendation as IMBA has identified that this area offers significant opportunities for future mountain bike access and we seek to pursue this in the future.

Alternative D

- *Sandia Ranger District* - the recommended Wilderness parcel (D5_ADJ9) to the east of Albuquerque is of concern to us as it represents a restriction on recreational access close to an urban center. This parcel should be removed from recommended Wilderness consideration.

Alternative E

- *Magdalena Ranger District* - we do not feel that the recommended Wilderness parcels north of the town of Magdalena (D3_5K7, D3_5K7.b & D3_5K7.d) are appropriate, as they could restrict mountain bike access in an area where economic benefits could be realized through increased tourism, such as mountain biking. These areas also offer the wild, backcountry experience that many mountain bike enthusiasts seek.
- *Magdalena Ranger District* - similarly the recommended Wilderness parcels D3_5K10 & D3_5K11 in Datil Mountains could restrict mountain bike access in this area which could benefit from increased tourism. These areas also offer the wild, backcountry experience that many mountain bike enthusiasts seek and should be removed from Wilderness review.
- *Magdalena Ranger District* - there are currently mountain bike accessible routes between the Apache Kid and Whittington Wilderness areas. We request that the recommended Wilderness parcel labelled D3_ADJ8 in the San Mateo Mountains should not extend as far north, as this would constrict east-west mountain bike passage between the existing Wilderness areas. Instead it should only extend as far north as the most northerly point of the existing Apache Kid Wilderness boundary. Parcel D3_ADJ8 also contains TR31, TR63, TR43, TR69 which should not be impacted due to any additional management prescriptions.

- *Magdalena Ranger District* - parcel D3_5K2 should be removed from further analysis as it includes TR21, TR26 and TR8. TR8 is especially important as it is a connector to other trails including TR10 and TR25. Similarly, parcel D3_5K3 should be removed as it includes TR70, TR17, TR14 and TR15. The Langmuir Research Site is also in this area and includes many trails which are currently open to mountain bikes without any concern.
- *Magdalena Ranger District (San Mateo Mountains)* - the parcel labelled as 'Backcountry Wildlife Conservation Area' boasts extensive mountain bike trail access which should not be negatively impacted due to additional management prescriptions. We are currently unfamiliar with parcels D3_ADJ3.i, D3_ADJ3.d, D3_ADJ3.h, D3_ADJ3.f, D3_ADJ3.c, and hope to provide information on them during the next comment period.
- *Magdalena Ranger District (San Mateo Mountains)* - for parcel D3_ADJ7, the Big Rosa Canyon trail (FR56 & TR36) runs along the boundary it shares with the Withington wilderness. This is a popular trail, enabling a longer loop ride and should remain open to mountain bike access.
- *Magdalena Ranger District (San Mateo Mountains)* - parcel D3_ADJ8 contains TR31, TR63, TR43, TR69; parcels D3_ADJ8.c, D3_ADJ8.e, and D3_ADJ8.b, contain many trails including TR68, TR45, Tr48, TR81, TR87 and should be removed from any further Wilderness review.
- *Mountainair Ranger District* - the recommended Wilderness area labelled D4_5K2 is of concern to us. Specifically there is an existing trailhead in the area serving the public, including mountain bike access which should not be restricted due to Wilderness Recommendation or future designation.
- *Sandia Ranger District* - the recommended Wilderness parcel (D5_ADJ9) east of Albuquerque is of concern to us as it represents a restriction on recreational access close to an urban center.
- *Sandia Ranger District* - the recommended Wilderness parcel to the north of Albuquerque (D5_ADJ4) is of concern to us as it represents a restriction on recreational access close to an urban center. This parcel should be removed from further Wilderness consideration due to it's proximity to an urban center, instead we request that the USFS develop mountain bike access in the area to encourage public recreation.

Continental Divide National Scenic Trail (CDT)

- The CDT traverses the Mount Taylor Ranger District and it is our request that none of the management prescriptions in any of the Alternatives (A-E) negatively impact mountain bike access on that trail.

Additional comments

- We wish to learn more about the following designations: '*Critical Habitat*', '*Draft Management Area 2016*' and '*Backcountry Wildlife Conservation Area*' and we will comment on any areas designated as such once the next round of Alternatives has been released. It is our request that any areas with any of these designations with trails currently open to mountain bike use, remain as such, and that future mountain bike trail development is allowed under these designations.

Ms. Kohrman, we look forward to reviewing the Final Drafts of the five Alternatives and we trust that our feedback will be incorporated into them. We wish to thank to Cibola National Forest for their work on this process and in managing public lands for this and future generations.

Sincerely,

A handwritten signature in cursive script, reading "Patrick Kell".

Patrick Kell
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