



Back Country Horsemen of New Mexico
PO Box 37005
Albuquerque, NM 87176-7005

November 2, 2020

Submitted via email to: objections-southwestern-lincoln@usda.gov

Travis G. Moseley, Forest Supervisor
Lincoln National Forest
Attn: Objections Reviewing Officer
3463 Los Palomas Road
Alamogordo, NM 88310

RE: Lake Hale Area Management Project – Pre-Decisional Objections

Supervisor Moseley:

The Back Country Horsemen of New Mexico (BCHNM) respectfully submit this Pre-Decisional Objection pursuant to regulations at 36 CFR §218 (2013) regarding the 17 September 2020 Draft Decision Notice for the Lake Hale Area Management Project EA (Lincoln National Forest, Smokey Bear District).

We applaud the Smokey Bear Ranger District for its desire to better manage recreational use on national forest system lands in the vicinity of Hale Lake. We understand that the agency is attempting to balance increasing resource damage—which has occurred as a result of an obsolete and often illegally-created system of roads, ways and trails—with expanding recreational demand placed by the public. We are glad that the agency has made this project a priority and has directed resources toward the project Environmental Assessment.

We applaud District Ranger Jodie Canfield for recognizing, in their Draft Decision Notice (Decision Rationale, page 5 that:

To be responsive to public comments on the Draft EA...which were also focused on the incompatibility of traditional uses such as horseback riding and hiking and E-bikes on the proposed single track trail area #1 mainly due to the potential speed discrepancy (~20-28 mph versus 3-10 mph) and ensuring safety issues.

While we recognize that motorized recreation represents a valid and important form of recreational activity among our nation's system of public lands, we appreciate recognition in the

Decision document about the sometimes incompatibility of mixing potentially high-speed motorized uses with non-motorized uses on national forest system trails.

Statement that Demonstrates the Connection Between Prior Specific Written Comments on the Proposed Project and the Content of the Objection (as per §218.8(d)(6))

BCHNM's mission, interests and understanding of the Lake Hale Management Area Project are described in our 19 August 2020 comment letter submitted during the public comment period for the Draft Environmental Assessment (EA) for this project. Our objection is specific to our concern about safety issues associated with the proposed trailhead parking facilities. Specifically, our comment letter requested that motorized and non-motorized trailhead parking areas be separated as a result of potential safety risks associated with the loading and unloading of horses in close proximity to parking areas where motorcycles and ATVs could concurrently be allowed to load/unload. The often explosive sound associated with engine startup, or the revving of motorcycle and ATV engines when loading/unloading, has great potential to startle even the best trained horses. A horse startled in such a scenario could cause injury to itself (if tied and/or if were to rear within the trailer), to equestrians or others if it were to break free and bolt. The most straight-forward solution is to separate, at a modest distance, parking areas for these forest visitors.

Aspects of the Proposed Project Addressed by the Objection (as per §218.8(d)(5))

Again, BCHNM's membership fully supports the Forest Service's efforts to restore forest resources while providing quality recreational opportunities for the public in the Hale Lake project area. The proposal to construct up to three gravel parking areas, as funding becomes available, is welcome and necessary. Safe and readily-accessible trailhead parking facilities for all visitors are needed by all forest trail visitors and we ask that the project design features be amended to recognize this imperative.

How the Draft Decision Specifically Violates Law, Regulation, or Policy (as per §218.8(d)(5))

The Forest Service's long established policy is to regulate specific user groups based on the particular impact to forest resources and other uses and visitors. See, e.g., FSM 2310.2 ("The objective of recreation planning is to inventory, analyze, and propose levels and types of uses to meet the Nation's outdoor recreation needs as established through RPA program and assessment, regional guides, and forest plans"). Moreover, the Forest Service's 2005 Travel Management Rule (36 CFR Section 212.55(b)) directs agency personnel, when making decisions regarding the designation of motorized trail use, to "consider the effects of the following with an objective of minimizing...Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands."

Suggested Remedies that Would Resolve the Objection (as per §218.8(d)(5))

BCHNM believes that the project decision must reflect the need, as described above, for separate parking areas for motorized and non-motorized trail users in order to safely accommodate public egress to the proposed trail system.

Conclusion

We appreciate the ability to submit this pre-decisional objection. It is our belief that only through strong partnerships and effective collaboration can the goal of maintaining publicly-supported trail systems be achieved.

For reasons described herein, we object to one specific aspect of the Final EA and Decision Notice, and request review of this decision. Pursuant to 36 C.F.R. § 218.11 we request a meeting with Forest Service personnel to discuss the issue raised in our objections. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Maresa Luzier". The script is cursive and fluid.

Maresa Luzier

