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First name: Aaron

Last name: Clark

Organization: IMBA (International Mountain Bicycling Association)

Title:

Comments: Interested Person Request

Please accept this request for "interested person" status pursuant to 36 C.F.R. § 219.57 concerning the following-described objections to the Santa Fe National Forest Plan Revision. IMBA would like to participate as an interested person in the objection resolution discussions the identified objection issues for the Santa Fe National Forest 2021 Land Management Plan Final EIS/ ROD.

Name: International Mountain Bicycling Association via Aaron Clark-Policy Manager

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Phone # or email: (O) 303-545-9011 / aaron.clark@imba.com

Name of lead interested person (if more than one): Aaron Clark

I am interested in participating in any resolution discussions between the objector(s) and the reviewing official for the following objection issues:

As demonstrated by IMBA's comments submitted on the Santa Fe Forest Plan Revision process since 2015 as demonstrated more below, IMBA has an interest in various issues concerning forest management addressed by the proposed plan, including but not limited to Recommended Wilderness, Recreation Opportunity Spectrum, Continental Divide Trail National Scenic Trail Management, and other forest plan allocations.

IMBA seeks to participate in discussions around the following topics that have been identified in the USFS EIS/ROD document and the document titled, "Preliminary Summary of Santa Fe National Forest Land Management Plan Revision Objection Issues".

Objection of New Mexico Wild/Center for Biological Diversity (Dated Nov 1, 2021). This objection raises issues and claims there are too few proposed recommended wilderness areas (RWAs) in the plan and that the process by which they were determined was flawed and in violation of regulatory requirements. IMBA does not support this objection. IMBA is gravely concerned with this objection and the false claim that climate change action and adaptation measures must be associated with a Wilderness or Recommended Wilderness designation in order to be effective at addressing climate change or aiding carbon sequestration or reducing threats to wildlife. We are interested and concerned that during the objection negotiation process, RWAs could be arbitrarily expanded outside the public review process to appease these misguided claims in fear of litigation. We are specifically concerned with requests for RWAs being added to the final plan that include but are not limited to the following names given to Forest Plan Unit Block Numbers such as Rio Nabe "RWA", Thompson Peak "RWA", and Tesuque Creek "RWA".

Objection of Center for Biological Diversity, Defenders of Wildlife, WildEarth Guardians, Sierra Club and New Mexico Wilderness Alliance (Dated Nov 1, 2021): This objection claims that the Forest Service analysis fails to take the required hard look, and again associates only benign designation name protocols of wilderness with quantifiable carbon sequestration and how this should have resulted in the Forest choosing an alternative with greater recommended wilderness. IMBA does not support this objection and claim. IMBA is gravely concerned with this objection and the false claim that climate change action and adaptation measures must be associated with a Wilderness or Recommended Wilderness designation in order to be effective at addressing climate change or aiding carbon sequestration or reducing threats to wildlife. We are interested and concerned that during the objection negotiation process, RWAs could be arbitrarily expanded outside the public review process to appease these misguided claims in fear of litigation. This objection also confuses Recommended Wilderness with Wilderness and states that the USFS should have chosen an alternative with greater Wilderness. Only Congress can designate Wilderness therefore this objection is misguided. We want to ensure that we are a part

of any conversation that would address these issues.

Objection of Craig Jolly (dated Oct. 31, 2021): This objection seeks to have all or nearly all Inventoried Roadless Areas (IRAs) added to the plan as Recommended Wilderness Areas (RWAs). IMBA does not support this objection. IMBA is concerned with what the impact of this request would have on the diversity of the communities recreational opportunities, its mental health and ultimately the overall support for public lands should such vast areas of the forest be managed as RWA and greater restrictions to public access employed. IMBA is specifically concerned with new RWAs for the Thompson Peak Roadless Area, the Rio Nambe, Tesuque Creek, and the Greater Santa Fe Watershed. This objection again confuses Recommended Wilderness with Wilderness and states that the USFS should have made Wilderness additions to a variety of areas. Only Congress can designate Wilderness. This objection is misguided. We want to ensure that we are a part of any conversation that would address or further confuse these issues.

Objection of Greg Warren (dated Oct 31, 2021): This objection focuses on the management prescription and allocation for the Continental Divide National Scenic Trail. This objection has aspects that seek to change or amend the Forest Service Manual. This objection is primarily composed of generalized boiler plate language directed at the CDNST. This is outside the scope of this plan. IMBA does not support this objection. In this objection the objector opposes bicycle use in primitive ROS settings, opposes the plans characterizations of ROS classes, among other things. The objector opposes portions of the new Forest Service Manual (FSM 2310) and then bases his SFNF objections on his preferences for what the FSM should say. This is outside the scope of this plan and this objection should be dismissed. IMBA is interested in participating in any discussion or negotiations regarding designated areas and plan allocation land management plan direction for the Continental Divide National Scenic Trail. This objection raises issues regarding managing for population growth, increased recreation pressure, and user conflict. IMBA recognized the challenges of this issue. But these issues cannot be conveniently utilized as objections to seek additional predatory access losses and trail closures for bike access. Claims of user conflict cannot be raised post decision in a last attempt to seek trail access closures. IMBA wants to be present to defend against any potential attacks on access to the CDNST based on the issues in this objection topic. We support the FEIS/ROD which factored in populations growth, recreation pressure and known or expected user conflict.

Please provide a brief explanation of your interest in the objection(s) and any specific concern(s), including a description of your support or opposition to the objection(s):

IMBA has a keen interest in areas recommended for wilderness designation, including the location and boundaries of such areas. This issue is also of keen interest to our local and national membership. Trail access for mountain biking has experienced profound losses due to designation of Recommended Wilderness areas based on boundary locations. We have participated in the planning meetings and discussions on the SFNF and are supportive of the current FEIS RWA determinations and boundaries in the final plan as these were determined in part to specifically avoid current mountain biking trail assets that are important and critical to our community.

We are aware that there are some interests who are seeking changes to this decision and seek substantially more RWA acreage as a result.

Therefore, any discussions, objections, and/or negotiations on backtracking on these decisions made, potentially threaten mountain bike access and we want to be involved to defend our access and cherished opportunities. Any new discussions of new Recommended Wilderness are also of keen interest and we do not support any further loss of access. We do not support any new or expanded RWAs beyond what is already included in this FEIS plan unless those areas are well vetted to avoid current existing trails and future trail goals and strictly meet the characteristic requirements of RWA allocation.

Designated area and plan allocation land management plan direction (wilderness, wilderness study area, recommended wilderness, inventoried roadless areas, backcountry areas, recreation emphasis areas, key linkage areas and the Continental Divide National Scenic Trail).

Same comment as above. Certain designated areas and plan allocations threaten bike access. Any discussions, objections, and/or negotiations in regards to altering the decisions made in the FEIS/ROD potentially threaten mountain bike access and we want to be involved to defend our access and cherished opportunities.

Motorized and/or mechanized recreation access and suitability determinations in recommended wilderness, roadless areas, key linkage areas, and backcountry areas.

The term "Mechanized recreation" has long been considered by the USFS to include mountain bikes and almost exclusively refers to bikes at this point in USFS culture and nomenclature. IMBA and our members have fought hard to protect bike access in this plan and for the most part we are supportive of the FEIS. If predatory objections seek to potentially revisit or erode these hard fought access wins and defenses, then we want to be involved to further review, oppose, and/or support the FEIS decision and prevent post FEIS losses. IMBA does not support bike bans in Recommended Wilderness, however, the SFNF Plan has carefully designed and designated RWAs that we can support. We cannot support changes to this that would result in further trail access losses.

Please identify when you commented during the planning process (scoping, draft EIS, and/or final EIS): IMBA has standing to file as an interested party based on the following comments submitted since 2015.

December 2, 2015 comments on the SFNF Plan Revision initial comment period

August 15, 2016 comments submitted on the SFNF 12 Focus Areas / Need for Change

June 14, 2016 comments submitted regarding the SFNF Wilderness Inventory

March 22, 2017 comments submitted regarding the SFNF Draft Alternative

Thank you for your assistance. If you have any questions about this request, please let me know. Sincerely,  
Signature: Aaron Clark