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First name: Robert

Last name: Stickler

Organization: Timberline Trailriders, Inc.

Title: President

Comments: Dear Sir or Madam:

Timberline Trailriders, Inc., a Colorado not for profit corporation, and Robert H. Stickler, an individual residing in Steamboat Springs, Colorado (collectively "Objectors"), hereby object to the Draft Decision issued regarding the Mad Rabbit Trails project. Inasmuch as none of the 2023 modifications to the proposals are in any way responsive to the comments previously submitted by Objectors, the comments submitted by Objectors on August 15, 2019 and on September 21, 2022, are unsatisfied and are hereby submitted as objections to the proposed or draft decision. Said comments and all attachments thereto are incorporated herein by reference.

To avoid running afoul of procedural rules designed to frustrate or block valid objections, the following are the specific objections of the Objectors, all of which have previously been submitted for consideration:

1. This whole planning process has been permanently poisoned by the fraud and deceit involved since its inception. The main Forest Service employee in charge of this planning exercise had his salary in full or in large part paid for by the user group that proposed this action [mdash] all without any disclosures to the public of this clear conflict of interest. The City of Steamboat Springs through the 2A Committee had Kent Foster on its payroll for the last several years he was a Forest Service employee and he regularly met with the Committee for direction. I'm sure a FIOA would find hundreds of emails from the Committee to Foster directing what he was to do. For him to have been in charge of this process purporting to be a fair and unbiased Forest Service employee is simply not credible and requires that this proposal, if deemed to be needed at all, be restarted with nonbiased planners.
2. The whole justification of the need for this planning process, which in large part only benefits one user group, bicyclists, is contrary to the facts and is an affront to other user groups who have thought they were "partners" with the Forest Service and have patiently been waiting for a comprehensive travel management review of the entire Rabbit Ears Pass area. The bicyclists just received official approval of 50 miles of illegally created user trails on Buffalo Pass, have the whole of Emerald Mountain for their trail system and have almost the entirety of the Steamboat Ski Area trail system at their disposal. The Chamber states that bicyclists have over 500 miles of trails to recreate on. To claim there's a need for additional single user bicycle trails in the Steamboat area is laughable at best.
3. The motorized community has continually requested a comprehensive travel management review of the Rabbit Ears Pass area for the last 25 years. This would look at recreational opportunities for all user groups, including motorcycles, ATV's and side by sides. It by necessity should include the Parks and Yampa Districts and the Arapahoe National Forest so that all travel from the Wyoming down to and including Gore Pass could be analyzed. To think that a few road connectors satisfies this need is a joke. The motorized users have seen dramatic increase in numbers over the last 20 years yet no planning has been initiated to accommodate this growth. We have repeated suggested that Rabbit Ears Pass presents unique and important opportunities given the easy access from US Highway 40 and the existing snowmobile parking lots (which we have supported provided they are utilized in the summer). Providing quality, environmentally sound motorized options off Rabbit Ears would help satisfy the need for more recreational opportunities for these users, who have been the single user group to pay their way on trail maintenance.
4. This proposal drops re-opening the Grizzly-Helena trail (Trail 10) and the connector from the snowmobile lot to the old Rabbit Ears Monument (Trail 13). The re-opening of the Grizzly-Helena trail (signs are there that indicate it was closed for lack of maintenance) has been discussed and promised for over twenty years. If re-opening it runs afoul of the out-of-date Forest Plan, the District should re-route it (which is feasible) or seek the amendment of the Forest Plan. Or provide another motorized connection to Forest lands north of US 40. Our proposal to re-lay the missing single track from the existing trail to Teal Lake would create a great loop opportunity and it would,

as usual, be open to all users.

5. The proposal drops the section of proposed trail (Trail 4) that would have at least allowed a semi-fragmented single track trail or route from Dry Lake to Fish Creek Reservoir Road and Trail 1101 (which was allowed to transform from a single track trail to an ATV trail without notice or discussion). Certainly this would not create a loop but it would provide one fragmented option for motorcycles to get to 1101 without dealing with the auto traffic on Buffalo Pass Road. No mention was made as to why this was omitted from this proposal.

6. The project document claims that the result will be 19.7 miles of looped motorized trail. This is false. The trails on Buffalo Pass are not looped and are fragmented. The portion

of 1101 open to motorized use is a fragmented section and was allowed to become an ATV route without discussion. And the new proposed connectors to the south of US 40 are simply connectors to existing Forest Roads. Travel of Forest Roads in no way equates to travel over quality back country single track. There is no looped single track motorized trail, no looped ATV trail, no looped UTV trail nor no looped jeep trail.

1. The project's skimpy offering to motorized users does not add any motorized single track miles. The 4 miles of short connector trails is proposed to be open to motorized vehicles 50 inches wide and less, meaning it would be an ATV and perhaps narrow side by side trail. This certainly does not meet the demand for quality, back country single track motorized trail. Look at the MVUM and you'll see no loop opportunities for motorized single track users in the southern part of the HPBE District. But we have to provide quality looped opportunities to the one user group who already has over 400 miles of trail options in the District??

2. Amazingly, no mention is made as to why none of the 50 plus miles of new single track trails proposed for north of US 40 are not open to motorized use. You claim they are multiple use yet you summarily exclude one large user group without discussion. This again shows the bias that is inherent in this whole proposal.

3. You repeatedly claim that the need for more bicycle trails is proven by the fact that the bicycle community has illegally created a trail system on Forest Lands. Do you really want that to be the justification for granting new trails to this outlaw group. All you'll do is encourage all other user groups to illegally create their own trails so they can be added to the system.

4. Do you think we're all stupid? You seem to claim that the illegal bicycle trails can't be stopped but then you amazingly propose a mechanism to stop them. Why not institute an off trail travel ban forest wide immediately? And provide enforcement dollars. And close and rehabilitate illegal trails. Then and only then consider adding new trails. Your failure to properly manage the lands under your control is not a justification for now applauding you perhaps taking some remedial action.

5. It's also amazing, but consistent with the bias of this proposal, that none of the new trail proposed along the busy US Highway 40 corridor are proposed to be multiple use trails, open to motorcycles and ebikes. Even the old highway roadbed is deemed unsuitable for motorized or ebike users. 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.

6. Or conversely, if motorcycle and ebike use on bicycle trails is so offensive, why haven't you proposed separate motorcycle and ebike trails. You set the precedent of rewarding bad behavior with separate trails for the out of control downhill riders on the Spring

Creek bypass trail. Don't polite and respectful users deserve at least the same consideration?

1. 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. And when that use (gravity bicycling) by its nature prohibits the sharing of the trail with other allowed users (hikers and equestrian), you propose a new trail system exclusive to one user group, contrary to all the "land of many uses" pronouncements.

2. The Forest Service proposes adding a new trail (#7 and #31) that parallel an existing trail (1101/CDST) which is non-motorized south of the Percy Lake trail. Again, why is absolutely no consideration given to making this

new trail a true multiple use trail, open to motorcycles. It could easily be routed to avoid conflicts with the existing Forest Plan or the Forest Plan could be amended. The non-motorized users already have 1101 for a backcountry trail traveling from Rabbit Ears Pass to Buffalo Pass. There are compelling reasons to make this new trail motorized giving those users a route north to Buffalo Pass. And imagine linking this with the old Grizzly-Helena trail and re-establishing that trail. That would provide a true loop and true destination trail system. The existing 1101 trail would give those who do like to share the option of staying on the nonmotorized trail.

3. To propose a highly dense bicycle trail system goes against the preferred trail layout for our forest lands. Your proposed layout is four times above the recommended density. 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.

4. 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. They bring in lumber and other materials to make artificial jumps. The most logical management decision should make bicycle traffic uphill only on these trails or to make sure that new trails have an approximately equal amount of up and down sections, thwarting the coasters.

5. 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. Have you made any attempt to estimate the increase in traffic on US 40 this project will cause??

Long after your bicycle plan has produced ungodly amounts of traffic on Buffalo Pass road did you admit that it never occurred to the biased planners to look at the logical and natural effects of catering a trail system to users who rely on shuttling their bicycles to the top of the trails and then coasting down. Have you looked at where the bicycle shuttles with begin and end? Have you planned adequate parking, restrooms, accelerate/deaccelerate lanes, etc.? Do you have the necessary funding for these improvements? The Forest Service has been blinded by the conflicts of interest with the 2A Committee and has wholly failed to do a fair and reasonable planning approach.

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 users already have such an area and it's in place and operating [mdash] The Steamboat Ski Area. This is in addition to such trails existing or being developed on Emerald Mountain and the gravity trails provided on the recent Buffalo Pass disaster. Gravity use should be limited to existing locations and not encroach on other portions of the Forest.

1. The trail density 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. This proposal should be shelved until such time as funds are guaranteed to be available for trailhead amenities (and their regular maintenance), enforcement so no more illegal trails are constructed, trail maintenance, etc.

2. Proposing a dense trail system in roadless areas and in areas where motorized use is 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 as proposed here, 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.

3. 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.
4. Creating another bicycle "amusement park" should also address the ability of ambulance or search and rescue to reasonably access the trail system for prompt extrication of injured riders. This does not seem to be addressed.
5. 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.
6. 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 dispersed trail system which would only intermittently disturb wildlife.
7. The proposal should also include seasonal closures to protect wildlife and provide hunters the historical access and success they traditionally have enjoyed. Why do you propose seasonal closure on the new motorized trails but a few specific closures on the bicycle trails proposed? Seems like seasonal closures should be similar across the board.
8. 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.
9. There are 21 miles of proposed Mad Rabbit trails in acknowledged elk calving areas that will have no seasonal closures at all. Peer reviewed research has shown a 5% probability of mortality of an elk calf each time it is disturbed, which can occur as far as 1500 meters away from mountain biking activity. Not placing seasonal restrictions on elk production areas explicitly violates CPW's "Planning Trails with Wildlife in Mind."
10. The Forest Service has opted not to perform and provide an Environmental Impact

Statement for a proper cumulative effect analysis for the area, stating it is relying on the 1998 Forest Plan instead. This plan is woefully out of date, and none of the trails included in the Mad Rabbit proposal are mentioned in the 1998 plan,

1. NEPA requires and relies on the Forest Service offering several alternatives. In the past it has normally been four options with one of them being the No-Action Alternative. Here the No-Action Alternative is actually another lie as it's actually providing for the illegal, user created trails to remain open. A true No-Action alternative would be for the Forest Service to close and rehabilitate the illegal trails as they are required to do under their oversight of public lands. Claiming they have no power to stop illegal trails is absurd. Allowing them to continue under the No-Action Alternative is actually an action alternative. So their proposal is do we let the illegal bicycle trails continue to be used or do we make most of them system trails and maybe close the remainder plus make new trails for those who created the illegal trails? Great choices! And clearly not what is required or expected under NEPA.
2. Amazing how after lying about their inability to close illegal trails, the Forest Service wants to be congratulated for closing what portion of these trails are not adopted as system trails. Sounds nice except that if you read the fine print they are only promising that the remaining illegal trails may be closed and rehabilitated. So they could allow them to remain in use indefinitely. And of course there's no funding for closure or rehabilitation or enforcement to prevent more illegal trails from being constructed.
3. This proposal follows the Forest Service's trick of doing piecemeal proposals to avoid having to analyze the full impacts of their actions. Buffalo Pass was first to give the bicyclists a bunch of new trails and adopting their illegal trails. With that in place, they come back with a proposal to improve Buffalo Pass Road. Gee, since the bicycle trails are probably going to double the daily car count on the road, maybe that should have been considered at the same time? And now we're still looking at trails in the Buffalo Pass area many years later? All of the Buffalo Pass and Rabbit Ears Pass travel decisions should be made at one time and should involve all user groups and all modes of travel.

4. Lastly, we incorporate by reference the comments to this proposal submitted by the Trails Preservation Alliance, Mountain Trails Axxis and the Colorado Snowmobile Association, as if set forth word for word herein.

Timberline Trailriders, Inc.

Robert H. Stickler, President

Robert H. Stickler, individually