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Comments: Continental Divide National Scenic Trail (CDNST) Proposed Reroute/Trail Addition #31283

To Whom It May Concern:

In reference to Continental Divide National Scenic Trail Addition #31283.

I am for Alternative 3 (Alternative preference in favor of mountain bike use for this portion of CDNST):

"Under Alternative 3 approximately 31.2 miles of new trail construction would occur from the Skyline Trail (#465) in the La Garita Mountains to Lujan Pass with the purpose of re-routing the CDNST and Colorado Trail from the current location. One spur trail of 0.9 miles would be constructed to connect the CDNST and Colorado Trail to Luder's Campground. Allowable uses on this trail would include horseback riding, hiking and mountain biking (mechanized use). Motorized use would not be permitted. Approximately 2.0 miles of non-motorized trail on the GMUG NF would be decommissioned following construction of the new trail."

I do not believe that the Environmental Assessment, which prefers Alternative 2, to be sound. On or about page 28 of the Environmental Assessment that was conducted for this proposed reroute, the EA makes several statements about tread impact that are not based on any studies and are simply not accurate. The EA then makes the conclusion "In general terms, bicycle use on the CDNST is not consistent with the overall objectives for the CDNST." As I understand, Mechanized travel is accepted per the 2009 Continental Divide National Scenic Trail Comprehensive Plan and this must be continued. In addition, the "overall objectives" referred to by the EA were drafted in the 1960s, before mountain bikes existed, so it is without merit to argue that the objectives of the CDNST at that time meant to ban bikes when mountain bikes were not even around.

Further, the following studies invalidate the tread impact assertions in the EA:

Chiu, Luke and Kriwoken, Lorne, "Managing Recreational Mountain Biking in Wellington Park, Tasmania, Australia," Annals of Leisure Research

Crockett, Christopher S., "Survey of Ecological Impact Considerations Related to Mountain Bicycle Use on the Edwards Field Trail at Joseph D. Grant County Park, 1986, Santa Clara County (CA) Parks Dept. (1986)

Goeft, Ute and Alder, Jackie, "Sustainable Mountain Biking: A Case Study from the Southwest of Western Australia," Journal of Sustainable Tourism, (2001), 9(3):193-211

Wilson, John P. and Seney, Joseph P., "Erosional Impacts of Hikers, Horses, Motorcycles and Off-Road Bicycles on Mountain Trails in Montana," Mountain Research and Development, (1994), 47(1):77-88.

In summary, the conclusion of these studies is that mountain bikes produce the same impact on trails as hikers and far less impact than horses and that the most important factor, by far, is trail design (i.e. faulty trail design leads to substantially more erosion than user impact). In fact, there has not been any study which contradicts these studies. Thus, the EA's finding on tread impact by mountain bikes is without scientific basis and must be disregarded.

The EA also discusses the impact of "high volumes of traffic" but as the study has found, over a period of approximately 1 month, there were 236 hikers and 77 mountain bikers on this stretch of the CDNST, working out

to be approximately 7.8 hikers/day and 2.5 mountain bikers/day (less than 1 user/hour during daylight hours). This is hardly a high volume traffic area. This is a section of trail that is remote and far from the Front Range and other population centers and has little user traffic. It is also hard to access so it is very unlikely that the volume of traffic will materially increase. It is primarily used by a limited number of thru hikers and thru bike packers.

Further, on page 29 of the EA, it states: "Some riders may actually prefer the use of roads and more developed surfaces and less of a feeling of isolation, while others seek that experience." However, this statement is speculative and biased against mountain bikers. The assertion (which is made without factual basis) that some user groups might prefer "roads and more developed surfaces and less of a feeling of isolation" is not limited to mountain bikers. This idea applies equally to horseback riders and hikers. However, it is only used as additional justification to exclude bicycles from the proposed trail.

The proposed re-route is not in Wilderness Area and there is no justification to ban mountain bikes in this remote region.

It should be noted that mountain bikes currently use most of the Colorado Trail, much of which is in the national forest. Trail conflict on the CT is minimal, despite significant traffic from hikers, horses and mountain bikes. The CT is a great model that shows: 1) that mountain bikers cause no more tread impact than other trail users; 2) user conflict is minimal (I have bike packed over 200 miles of the CT and talked to numerous hikers along the way and had a great rapport with hikers and none mentioned problems with mountain bikers) and 3) that communities can work together for the benefit of the trail, such as the Colorado Trail Foundation, IMBA and others.

In conclusion, EA's preferred alternative (2) is not based on best available land management practices or science. Alternative 3 should be selected so our public lands are inclusive to all low impact user groups, including mountain bikes.

Thank you,

Walter Winslow.
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