

Data Submitted (UTC 11): 12/16/2012 11:55:04 PM

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Comments: CDNST Addition #31283

Mary Nelson??

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RE: Continental Divide National Scenic Trail Addition #31283

Dear Ms. Nelson,

The Environmental Assessment (EA) for the Continental Divide National Scenic Trail Reroute – Lujan to La Garita Wilderness includes several items that need to be corrected.

First, the EA states that mountain bike use would have environmental effects. While this is true, the environmental effects of foot and horse use are not discussed in any meaningful detail in the EA. Environmental impacts of all trail uses need to be assessed particularly the cumulative effects of Alternative 3 relative to the other alternatives that do not allow bicycle use.

Second, the EA states that the "'cross section profile' of trail tread used by mountain bike traffic is often rounded, or open horseshoe shaped." The EA states that this (the "cross section profile") can affect user experience. Neither the "cross section profile" nor the user experience statements are based on research or a scientific-based assessment. This information needs to be removed from the EA unless actual research or scientific-based assessment(s) are referenced to support the statements made in the EA.

Third, the "hummocking effect" discussion is also not based on research or scientific-based assessment. This information needs to be removed from the EA unless actual research or scientific based assessment(s) can be provided that support the statements made in the EA.

Fourth, the EA includes the vague statement that "In general terms, bicycle use on the CDNST is not consistent with the overall objectives for the CDNST." Please list the overall objectives of the CDNST and specifically how this EA claims that mountain bike use is not consistent with these objectives. Otherwise, remove this statement from the EA.

Lastly, due to the lack of scientifically-based assessments for the issues noted above, we request that the proposed action of the EA be revised to Alternative 3 – mechanical use.

Thanks for the opportunity to comment on this EA.

Sincerely,

Brian LeDoux

Director

Lower Arkansas Mountain Bicycling Association

Cañon City, CO