

Data Submitted (UTC 11): 2/20/2023 7:00:00 AM

First name: John

Last name: Nelson

Organization: San Juan Back Country Horsemen

Title: President

Comments: 1. We support the vegetation management goals for this project and appreciate the changes that have been made during the scoping phase in 2022 that protect wildlife habitat.

2. Importantly, today the agency and its partners are unable to maintain what we already have for trails and facilities, and, in fact, we are losing trails and facilities everywhere due to a lack of maintenance and reconstruction. Whether IMBA and others are involved in bringing money to the table from state and federal grants, such broad expansion for mountain bike trails as is being proposed at Jackson Mountain can only be seen as detrimental to the goal of catching up across the landscape - for taking care of what we already have. Please explain how the Forest Service realistically sees this overall situation getting better with our existing trails and facilities if this proposal is approved on the broad scale desired by the proponents.

3. We believe much of the premise of this project is wrong, and that instead of what is apparently a racecourse (even in its pared down version from the original 60+ to 40+ miles of trail), mountain bikers should instead be given a network of trails that are not so much loop oriented for racing purposes but more for destination and natural experience. While we understand this is not what is being sought by much of the biking community, that they are seeking thrill experiences, we believe the Forest Service is not obligated to provide such an area and on such a scale as is being considered here. In fact, we would offer that the agency would and has turned down requests from other recreation user groups for competition venues and areas for shooting ranges, motorcycle and OHV racecourses, horse endurance courses, etc., so we would ask why this case is different. Please explain how building a thrill and racing mountain biking trail system is consistent with national FS goals.

4. Creating this cycling area at Jackson Mountain and linking it (as the project proponents have already said they wish to do) with other areas in and around the district like the town of Pagosa, Turkey Springs, and the East Fork/Continental Divide area, would take up much of the area outside of Wilderness for the Pagosa Ranger District. We don't think this is right, and we believe it is not in sync with the FS national goal of providing for sustainable recreation and balanced natural resource management. Furthermore, locking up such a large area for mountain bike use would not allow for future uses by other user groups such as those who likely will be extirpated from Wilderness as use increases and when limits on use and permit systems are implemented, which is already being discussed. Linking biking areas with longer distance through-trails may be acceptable, but building what is for all practical purposes a mountain biking racing venue would draw large numbers of users and predictably require expanded accommodations and more trails in the future across a broader landscape as demand increases. Please explain why the concept here is for what is tantamount to a racecourse instead of constructing a few through-trails as might be expected in other areas and with other recreation user groups' expectation and how this could adversely affect overall recreation management in the future for all users.

5. We do not understand how the Forest Service, learning that illegal trails were being built at Jackson Mountain, instead of stopping that illegal work, taking corrective measures, and rehabilitating the area, has instead elected to sit with the biking community and plan the use of those trails and much more. What other user group is treated this way? Our stock using group and stock using partners consider the Forest Service as our partners, and we truly work hard to make our members understand that we cannot do whatever we want in the forest. We would not support such illegal behavior as this from within our group and would expect that we would likely be severely reprimanded by the FS if we were to construct anything we please out in the forest or, for that matter, do anything outside of the terms of our agreements with the FS. Please explain why this has happened with the cycling community this way and how it is fair for all.

6. If mountain biking racing and thrill venues are desired and are seen as an appropriate use of national forest

lands, then why not use already impacted areas such as the expansive Turkey Springs trails system, including the Devil Mountain area, the highly developed Wolf Creek Ski Area, or other sites such as Reservoir Hill that have already been developed for bike racing or may be suitable for such use. Please explain why this is not a reasonable and logical alternative to building an expansive new area at Jackson Mountain.

7. We have been told that the Pagosa Ranger District sees the mountain biking community as being underserved in our area, despite existing facilities across the area for bikers. Opportunities on other surrounding ranger districts also have increased dramatically in recent years by the construction of significant mountain biking and motorized recreation trail systems. Please explain why the Pagosa Ranger District feels it is necessary for every ranger district to look the same in this regard rather than keeping some districts without as much mountain biking and motorized recreation emphasis. Also, please explain the cost/benefit of changing from the more primitive end of the recreation opportunity spectrum (as is much of the Pagosa RD today) to a more developed, mechanized, and motorized setting in the future.

8. We find it perplexing that, considering the previously mentioned illegal bike trail building that has been done at Jackson Mountain and the dozer work we understand has already been done in the Snowball area apparently preparatory to accessing the Jackson Mountain area for mountain bikes, the Forest Service has not stopped and assessed this situation from a different angle. Please explain how and why these things have been allowed to happen without either explanation or lawful intervention by the Forest Service.

9. We believe that mountain biking is as legitimate a use of public lands as any other, including stock use, but it somehow feels that mountain biking is being given a much greater emphasis for the future in this area than other uses. It seems that the biking community sees our local public lands as opportunity for unrestricted growth and development for biking. Please explain how the district sees this apparent unlimited growth opportunity for mountain biking to be consistent with the overall balance of natural resource management needs for the future.

10. If any aspect of this proposal is about providing business opportunities for Pagosa Springs, as some people have explained it to be, we feel that business opportunities relying on national forest lands surrounding our area already exist and will continue to expand as our population and use grows whether Jackson Mountain bike trails are built or not. People come here for the beauty, and businesses can grow and profit from the many other ways people want to enjoy the public lands in this area. Business success in this town can include mountain biking, but balance is needed and having much of the land through the middle of the district devoted to mountain biking and racing would likely detract from other less-impacting business opportunities such as guided hiking, horseback riding, nature tours, etc. Please explain this potential change in business emphasis in our area and how the Forest Service sees these things balancing if the Jackson Mountain trail system is constructed.

11. We are wondering why the Forest Service is working directly with this single user group (mountain bikers) and apparently exclusive of Pagosa Area Trail Council involvement. We have BCH members serving on the PATC board of directors, and while we understand the PATC president has had some involvement in this matter, our board members do not recall any involvement where the Jackson Mountain proposal has been discussed formally with the cycling community and other PATC member user groups at our community meetings as one might expect to happen with a 'trails council', other than the biking proposal being presented - no upfront council discussion. In fact, we cannot remember any mountain bike user involvement in PATC activities over the last several years, which is unfortunate considering that the whole purpose and intent of the Forest Service-endorsed PATC group is to bring user groups together to seek mutual understanding and agreement. Please explain this apparent difference in how trails matters are approached with PATC involvement.

February 10, 2023

Josh Peck, District Ranger

Pagosa Ranger District

PO Box 310

Pagosa Springs, CO 81147

Dear Josh,

The purpose of this letter is to provide San Juan Back Country Horsement's comments for the Jackson Mountain project.

1. We support the vegetation management goals for this project and appreciate the changes that have been made during the scoping phase in 2022 that protect wildlife habitat.
2. Importantly, today the agency and its partners are unable to maintain what we already have for trails and facilities, and, in fact, we are losing trails and facilities everywhere due to a lack of maintenance and reconstruction. Whether IMBA and others are involved in bringing money to the table from state and federal grants, such broad expansion for mountain bike trails as is being proposed at Jackson Mountain can only be seen as detrimental to the goal of catching up across the landscape - for taking care of what we already have. Please explain how the Forest Service realistically sees this overall situation getting better with our existing trails and facilities if this proposal is approved on the broad scale desired by the proponents.
3. We believe much of the premise of this project is wrong, and that instead of what is apparently a racecourse (even in its pared down version from the original 60+ to 40+ miles of trail), mountain bikers should instead be given a network of trails that are not so much loop oriented for racing purposes but more for destination and natural experience. While we understand this is not what is being sought by much of the biking community, that they are seeking thrill experiences, we believe the Forest Service is not obligated to provide such an area and on such a scale as is being considered here. In fact, we would offer that the agency would and has turned down requests from other recreation user groups for competition venues and areas for shooting ranges, motorcycle and OHV racecourses, horse endurance courses, etc., so we would ask why this case is different. Please explain how building a thrill and racing mountain biking trail system is consistent with national FS goals.
4. Creating this cycling area at Jackson Mountain and linking it (as the project proponents have already said they wish to do) with other areas in and around the district like the town of Pagosa, Turkey Springs, and the East Fork/Continental Divide area, would take up much of the area outside of Wilderness for the Pagosa Ranger District. We don't think this is right, and we believe it is not in sync with the FS national goal of providing for sustainable recreation and balanced natural resource management. Furthermore, locking up such a large area for mountain bike use would not allow for future uses by other user groups such as those who likely will be extirpated from Wilderness as use increases and when limits on use and permit systems are implemented, which is already being discussed. Linking biking areas with longer distance through-trails may be acceptable, but building what is for all practical purposes a mountain biking racing venue would draw large numbers of users and predictably require expanded accommodations and more trails in the future across a broader landscape as demand increases. Please explain why the concept here is for what is tantamount to a racecourse instead of constructing a few through-trails as might be expected in other areas and with other recreation user groups' expectation and how this could adversely affect overall recreation management in the future for all users.
5. We do not understand how the Forest Service, learning that illegal trails were being built at Jackson Mountain, instead of stopping that illegal work, taking corrective measures, and rehabilitating the area, has instead elected to sit with the biking community and plan the use of those trails and much more. What other user group is treated

this way? Our stock using group and stock using partners consider the Forest Service as our partners, and we truly work hard to make our members understand that we cannot do whatever we want in the forest. We would not support such illegal behavior as this from within our group and would expect that we would likely be severely reprimanded by the FS if we were to construct anything we please out in the forest or, for that matter, do anything outside of the terms of our agreements with the FS. Please explain why this has happened with the cycling community this way and how it is fair for all.

6. If mountain biking racing and thrill venues are desired and are seen as an appropriate use of national forest lands, then why not use already impacted areas such as the expansive Turkey Springs trails system, including the Devil Mountain area, the highly developed Wolf Creek Ski Area, or other sites such as Reservoir Hill that have already been developed for bike racing or may be suitable for such use. Please explain why this is not a reasonable and logical alternative to building an expansive new area at Jackson Mountain.

7. We have been told that the Pagosa Ranger District sees the mountain biking community as being under-served in our area, despite existing facilities across the area for bikers. Opportunities on other surrounding ranger districts also have increased dramatically in recent years by the construction of significant mountain biking and motorized recreation trail systems. Please explain why the Pagosa Ranger District feels it is necessary for every ranger district to look the same in this regard rather than keeping some districts without as much mountain biking and motorized recreation emphasis. Also, please explain the cost/benefit of changing from the more primitive end of the recreation opportunity spectrum (as is much of the Pagosa RD today) to a more developed, mechanized, and motorized setting in the future.

8. We find it perplexing that, considering the previously mentioned illegal bike trail building that has been done at Jackson Mountain and the dozer work we understand has already been done in the Snowball area apparently preparatory to accessing the Jackson Mountain area for mountain bikes, the Forest Service has not stopped and assessed this situation from a different angle. Please explain how and why these things have been allowed to happen without either explanation or lawful intervention by the Forest Service.

9. We believe that mountain biking is as legitimate a use of public lands as any other, including stock use, but it somehow feels that mountain biking is being given a much greater emphasis for the future in this area than other uses. It seems that the biking community sees our local public lands as opportunity for unrestricted growth and development for biking. Please explain how the district sees this apparent unlimited growth opportunity for mountain biking to be consistent with the overall balance of natural resource management needs for the future.

10. If any aspect of this proposal is about providing business opportunities for Pagosa Springs, as some people have explained it to be, we feel that business opportunities relying on national forest lands surrounding our area already exist and will continue to expand as our population and use grows whether Jackson Mountain bike trails are built or not. People come here for the beauty, and businesses can grow and profit from the many other ways people want to enjoy the public lands in this area. Business success in this town can include mountain biking, but balance is needed and having much of the land through the middle of the district devoted to mountain biking and racing would likely detract from other less-impacting business opportunities such as guided hiking, horseback riding, nature tours, etc. Please explain this potential change in business emphasis in our area and how the Forest Service sees these things balancing if the Jackson Mountain trail system is constructed.

11. We are wondering why the Forest Service is working directly with this single user group (mountain bikers) and apparently exclusive of Pagosa Area Trail Council involvement. We have BCH members serving on the PATC board of directors, and while we understand the PATC president has had some involvement in this matter, our board members do not recall any involvement where the Jackson Mountain proposal has been discussed formally with the cycling community and other PATC member user groups at our community meetings as one might expect to happen with a 'trails council', other than the biking proposal being presented - no upfront council discussion. In fact, we cannot remember any mountain bike user involvement in PATC activities over the last

several years, which is unfortunate considering that the whole purpose and intent of the Forest Service-endorsed PATC group is to bring user groups together to seek mutual understanding and agreement. Please explain this apparent difference in how trails matters are approached with PATC involvement.

We would appreciate discussing these questions with you during the environmental analysis process and please let us know if we can clarify any of our point. We know you understand how important this project is to us and what we feel this all means for the future of our area. As we've said, we honestly support mountain biking and want to see trails available for that user group, but what is being proposed is simply too much, and we think more focus should be on destination-type biking trails rather than so many loops that can easily be seen as racecourse, which we feel is inconsistent with reasonable and balanced forest recreation and natural resource goals in this day and age.

We value our partnership with the Forest Service and submit our comments and questions in the interest of a shared goal of seeking the best management of our precious natural resources - the national forests - for the future.

Sincerely,

John Nelson, President

San Juan Back Country Horsemen