



**rfmba**  
ROARING FORK  
Mountain Bike Association



Our mission is to create and sustain the best possible mountain bike trail system and experience in the Roaring Fork Valley.

**Attn: BLM, Colorado River Valley Field Office. Director (21 0), Attn: Protest Coordinator, PO Box 71383, Washington, D.C. 20024-1383** 2300 River Frontage Road, Silt, CO 81652 (sent via email to: [co\\_crvrmp@blm.gov](mailto:co_crvrmp@blm.gov), [cornpkg@ttsfo.com](mailto:cornpkg@ttsfo.com), [cornpkg@blm.gov](mailto:cornpkg@blm.gov))

**From: Roaring Fork Mountain Bike Association, PO Box 2635, Aspen, CO 81612**  
Mike Pritchard, Executive Director, 970-948-3486

**Date: 5/1/2014**

**Re: Protest & Appeal Comments regarding the BLM's Colorado River Valley Proposed Resource Management Plan and Final Environmental Impact Statement**

On the following pages, please find detailed comments for the BLM Zones that are within our regional area of concern. We are supportive of Alternative B throughout this area of concern.

Protests (noted as such below) are submitted for specific SRMA/ERMA designations (or lack thereof) and for the N. Thompson unit's Assessment of Lands with Wilderness Characteristics.

Most of our comments are Appeal level concerns focused on current and future travel route system.

Please refer to addended RFMBA & IMBA Comments submitted during earlier phases of this process on 1/14//2012, 1/16/2012 & 8/17/2012.

## **ZONE F / (GREATER GLENWOOD AREA)**

1. This is the most populated area of all zones, yet there are the fewest trails in all of the zones located within this BLM jurisdiction. Although access is hampered by private lands in some locations, future public access to BLM lands via easement or via City of Glenwood public property should allow for development of recreational trails that would be highly valued by both the local mountain bike community and by local businesses interested in the increase of recreation opportunities for visiting tourists.

As Glenwood is the most populated area in the Roaring Fork valley and also heavily relies on tourist revenue, additional trails are needed to support this zone. Accessing the flat tops from Glenwood would provide a classic trail opportunity to reach high alpine zones with large vertical climbs/descents. A trailhead placed at the South Canyon exit of I-70 (on City of Glenwood Spring property) there could also be a trail system that heads south from the Interstate and connects to Red Mountain and an extended Jeanie Golay trail.

In the future, RFMBA will work with BLM staff to propose addition of purpose built mountain bike trail to the travel route system, where they are most appropriate. In addition, if easement access is acquired through certain private property, revision of specific Administrative routes to allow for mechanized use will be requested.

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2. Seasonal winter trail closures for wildlife can be supported in general. However, we recommend studying the boundaries in detail in order to provide limited areas where fat tire bike riding can be enjoyed as a winter time recreational pursuit. These areas would act as pressure relief valves to ensure that the majority of winter seasonal closure areas are not infringed upon. These areas should be determined at a future date as summer time bike routes are further developed in the area.

## **ZONE G / (RED HILL & FISCHER CREEK)**

1. If the Sutey Ranch/Two Shoes land exchange materializes, a new access route should be provided from/to the north side of the Red Hill SRMA area to alleviate the overuse pressure on the Carbondale side. The potential new adjacent BLM land (Sutey Ranch) should be integrated into the existing Red Hill SRMA area forming one larger unit. As part of the land exchange, funds are proposed to be provide for a management planning process to occur for the Sutey Ranch. RFMBA will advocate for a limited expansion of the existing Red Hill SRMA trail system onto this land, with connection to County Rd. 112 and nearby County Rd. 113 being a priority.
2. **PROTEST:** The Fischer Creek BLM parcel should be designated as a Special Recreation Management Area (SRMA) or an Extensive Recreation Management Area. A combination of largely unmanaged existing trails and a need for additional limited trail development (#3, below) would be best managed through an SRMA or ERMA.

We disagree with the philosophy that the designation of ERMA's and SRMA's should be carefully balanced (or even withheld) amongst the various units within this field office. Instead, these designation tools should be utilized as appropriate at each unit, regardless of the potential to end up with multiple SRMA's in one area (Red Hill SRMA, Crown SRMA, N. Thompson SRMA, etc..) In the end, this is a reflection of the local communities' desire for enhanced attention and management of specific cherished landscapes.

3. As submitted in previous RFMBA Comments, a new trail that provides access from Spring Valley/CMC to Fischer Creek will foster outdoor recreation opportunities for those students at the CMC campus and neighboring residential communities. This proposed will provide easy opportunities for the local college community to access existing nearby trails. Many of these students have little to no means, so driving to trails can be limited opportunity, or simply out of the question. Access from this point will allow a perfect back door access trail for the college residents and the neighboring residential areas. Additionally, this will provide a potential loop to Red Hill SRMA areas as outlined in #4 below.
4. As submitted in previous RFMBA Comments, there is potential to create a sustainable trail accessing Red Hill from lower Cattle Creek Rd. This would provide a solution that alleviates the pressure of the significant number of users accessing this SRMA from the Carbondale



trailhead, all while providing easier access for the Ironbridge neighborhood and the Glenwood Springs area.

5. As submitted in previous RFMBA Comments, an easement access is being sought through the private lands of the “Tree Farm” in El Jebel. If easement is granted, the public would have access to a BLM parcel of land on the Western Flank of Basalt Mountain. A combination of existing Administrative routes, existing routes on the ground due to Utility Power Line construction, and new route creation would allow for a highly valued access route from valley floor at El Jebel to access WRNF land on Basalt Mountain.
6. Seasonal winter trail closures for wildlife can be supported in general. However, we recommend studying the boundaries in detail in order to provide limited areas where fat tire bike riding can be enjoyed as a winter time recreational pursuit. These areas would act as pressure relief valves to ensure that the majority of winter seasonal closure areas are not infringed upon. The existing winter closure signed and posted for the northern portion of the Red Hill SRMA should not be extended to the more popular and easy to access southern portion of the trail system as mechanized use would be unnecessarily limited while foot traffic continues on unabated.

## **ZONE H / (NORTH THOMPSON CREEK)**

1. **PROTEST:** The assessment of Lands with Wilderness Characteristics (LWC) for this BLM unit is a decision that did not receive consensus support during deliberations of the Resources Advisory Council Subgroup (see Comments, addended). While RFMBA supports inclusion of the Lorax Trail as mechanized route within this area, and supports other motorized routes within the area for their inclusion of mechanized use, the Lands with Wilderness Characteristics (LWC) Assessment is problematic for the reasons (A,B,C,D,E,F) listed below. Given the existence of the Central Mountains Outdoor Heritage Wilderness Preservation Act, the final boundaries for which are currently under study by Senator Mark Udall and his staff, and the ongoing negotiations between local groups to revise the proposed Wilderness boundary to one that that can achieve broad community consensus, we propose that the boundary for this LWC Assessment be revised to align with the anticipated adjustments to the Wilderness Proposal.

While RFMBA supports the Area of Critical Environmental Concern located at the Southeast of this unit, and is also willing to support a congressional Wilderness proposal for a large portion of the area to the south and east, we question the impact that the LWC Assessment will have on the landscape, as it may un-intentionally act as a de facto Wilderness Designation when it comes to management of the landscape. However, given our support for Wilderness designation for a significant portion of this landscape, this Protest is in effect a request to revise the Assessed Lands with Wilderness Characteristics boundary.

The boundary would be adjusted as follows, to effectively allow for a process which may allow for approval of a limited trail system as described in #3, below. The northern boundary would be shifted towards the south, and would align with the Pitkin/Garfield



County line. The western boundary would be shifted towards the east to align with the Lorax Trail (#8271), and would continue south along the established motorized road (#8275). Alternatively, we are open to the western boundary shifting further east to allow for continued mechanized use of motorized route #8275. (This alternative may allow for further consensus support from Colorado Parks & Wildlife & motorized use advocates.) As RFMBA, a Chapter of IMBA, is part of the Outdoor Alliance, we further request a cherry stem or similarly effective boundary revision to account for concerns about the Fins Climbing Area voiced by the Roaring Fork Climber's Coalition and the Access Fund. This cherry stem or other type of boundary revision would allow for continued maintenance and additional thoughtful development of bolted climbing routes in the area.

- A. It is not clear as to whether trail improvement work, or trail reroute projects recommended for sustainability purposes will be allowed under this LWC Assessment. To eliminate the potential for trails to degrade without allowance for future maintenance, we recommend the above LWC boundary adjustment. Alternatively, we request an allowance for an LWC Assessment to not preclude maintenance or reroute of trails through use of hand tools only.
- B. The revised boundary described above may create an area smaller than 5,000 acres, but this should not be a concern given that the area is contiguous with a White River National Forest (WRNF) Wilderness Study Area (WSA) directly to the south.
- C. The Naturalness of the entire area has not received full consensus support due to imprint of human activity on the landscape. As currently proposed, motorized routes, mechanized routes, fences, and permit grazing activities would continue to occur. Modifying the boundary as described above would ameliorate some of these concerns.
- D. While the area can be considered to provide Outstanding Opportunities for Solitude, we actually find this to be a compelling reason to allow for mechanized use on the landscape. However, per LWC Assessment qualifications, the existing (& proposed to continue) motorized and mechanized uses are in conflict with the Assessment. The above proposed Boundary adjustment provides a meaningful solution, although motorized routes to the east of the proposed north-south boundary would remain an open issue unless the Alternative to shift the boundary further to the east is pursued.
- E. Per Appendix D, Chapter 6, in 1980, this area was removed from the BLM's initial Wilderness Inventory and was not recommended as a Wilderness Study Area in part due to the impacts of existing routes in the unit, and concerns about the validity of the opportunities for solitude and primitive unconfined recreation. While the size limitations have since been resolved due to the WRNF's Wilderness Study Area (WSA) designation directly to the south, the primary concerns remain in place. While this WSA area to the south has been found to be a Roadless area by the WRNF, the BLM unit in question has not been inventoried as a Roadless area by the BLM, and motorized routes are proposed to remain open.
- F. Per Appendix D, Chapter 6, listed recreation activities neglect to mention existing (and proposed to continue) mechanized recreation on the Lorax Trail as well as mechanized use on proposed motorized routes. It's not clear whether the LWC



Assessment is in conflict with mechanized use, however, the above proposed boundary adjustment would resolve this issue. The opportunity for primitive recreation setting is classified as only 21%, highlighting one reason for non-consensus application of the proposed Land with Wilderness Characteristics Assessment.

2. **PROTEST:** Designation of this unit as an Extensive Recreation Management Area (ERMA) may be appropriate given the following definition:

*“ERMA’s are designated administrative units where Recreation and Visitor Services (R&VS) are one of several emphasized resource uses. R&VS are managed for recreation activities and the qualities and conditions associated with those activities.”*

However, if the above Protest (#1) to revise the boundary of the Land with Wilderness Characteristics Assessment is not accepted by the BLM, the potential to effectively manage for recreation activities and the qualities and conditions associated with those activities may be severely limited, especially for mechanized uses.

Given the LWC Assessment, regardless of our protest to revise its boundary, a Special Recreation Management Area (SRMA) will provide an enhanced level of management for this unit. The SRMA designation will complement the LWC Assessment by offering a higher level of management for:

*“(a) a targeted set of activities, experiences and benefits derived from those experiences, and (b) the protection of desired recreation setting characteristics”.*

The use of the SRMA designation at this unit should not signify a primary focus on recreation, rather it provides a specialized tool for carefully managing limited trail development, climbing recreation, existing grazing activities, potential Wilderness area, and Areas of Critical Environmental Concern.

We disagree with the philosophy that the designation of ERMA’s and SRMA’s should be carefully balanced amongst the various units within this field office. Instead, these designation tools should be utilized as appropriate at each unit, regardless of the potential to end up with multiple SRMA’s in one area (Red Hill SRMA, Crown SRMA, N. Thompson SRMA.) In the end, this is a reflection of the local communities’ desire for enhanced attention and management of specific cherished landscapes.

3. RFMBA supports the inclusion of the Lorax Trail (#8271) as a recognized mechanized route in this zone. We also support the development of a limited trail system in the northern and western portions of this zone. One concept trail would be a jughandle loop configuration located to the east of the Lorax Trail, all to the north of the Pitkin/Garfield County line. The second concept trail would create loop utilizing the Lorax Trail with a new trail segment roughly parallel to the Lorax Trail, but on the western side of the prominent north-south ridge line in this area. This concept trail meets the desires of grazing permittees by keeping trails away from the private ranching land in the Carbondale valley floor. At the far southern end of this loop, a spur trail would provide connection to existing Thompson Creek routes farther to the South. (Having connectivity with other riding zones is a high priority for

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RFMBA.) This limited trail system will help to ensure that social trails are not developed outside of official BLM approval processes.

This proposal for limited trail development, based upon making a logic trail system around the Lorax Trail (usually ridden out-and-back currently), will help to alleviate trailhead overcrowding and overuse of other popular nearby BLM areas. The nearby Red Hill SRMA documents 55,000 annual user visits. As the valley experiences additional growth and the popularity of recreational opportunities continue to increase, local trails will continue to see more use. The North Thompson unit can help to alleviate this pressure.

4. Seasonal winter trail closures for wildlife can be supported for this unit in general. However, we recommend studying the boundaries in detail in order to provide limited areas where fat tire bike riding can be enjoyed as a winter time recreational pursuit. These areas would act as pressure relief valves to ensure that the majority of winter seasonal closure areas are not infringed upon. These areas should be determined at a future date as summer time bike routes are further developed in the area.

## **ZONE I / (CROWN & PRINCE CREEK)**

1. RFMBA supports the designation of this unit as a Special Recreation Management Area. We find this designation to be a reflection of the local communities' desire for enhanced attention and management of specific cherished landscapes. Our hope is for this SRMA designation to open the door for a comprehensive and collaborative trails planning effort to commence once this Resource Management Plan's Record of Decision has been signed.

Per Appendix K, Page 17, construction of 12-15 miles of trails is listed as a Best Management Practice to Guide Implementation-level Management. RFMBA welcomes this eventuality, and acknowledges that a well-planned trail system may involve significant reroutes and/or closure of specific low quality unsustainable routes. We would suggest that the eventual mileage of newly constructed miles of trail cannot be known at this time, and should be determined both by comprehensive community input as well as the expertise of third party trail system design consultants. Per RFMBA's mission, we envision the potential for a world class trails network that meets and exceeds the needs of both locals and visitors.

Currently, there is true potential for collisions between user groups. Motorcycles ascend quickly; mountain bikes descend quickly. Combined with the dense scrub oak vegetation surrounding the trails in this zone, serious injuries may result. Directional or user specific trails may provide a solution in some instances. Transient camping, largely unregulated, is a burden on the lands along Prince Creek Rd. Camp sites should be removed along the road to reduce this problem. Utilizing best practice management guidelines through the proposed SRMA designation, we're confident these issues can be resolved.

2. If the Sutey Ranch/Two Shoes land exchange materializes, a highly valued part of the complicated land exchange deal will bring the currently private land in the area of the lower Prince Creek trails ("Monte Carlo" area) into the BLM's hands. This will allow existing trails

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to become part of the official BLM trail inventory, many of which currently cross the current BLM boundary. A new parking lot / trailhead in this area is a potential welcome outcome. As this area is not being evaluated as part of the current RMP process, it may be an ideal location for winter fat tire bike recreation, adjacent to the Crown's SRMA winter mechanized closure. However per #9, below, the winter closure boundary could be revised slightly as described.

3. Trail 8325K should be fully developed as soon as possible. This route is proposed as a mechanized system trail in Alt. B, and provides direct public access from the Rio Grande Trail to existing trails on the north side of the Crown unit. This route, once developed, will obviate the need for an easement access on a steep existing route on nearby private property.

(We fully support the detailed comments submitted to BLM by the Midvalley Trails Committee of Eagle County on this topic, see Memo for Record dated 4/24/14, item 2.b.i.)

4. After the newly acquired Glassier Open Space (Pitkin & Eagle Counties) completes its management plan process, it is anticipated that a new singletrack route will be developed to connect with existing routes towards the northeast of the Crown unit. This singletrack route will roughly parallel an existing ranch route (that will be maintained by grazing permittee), and as a first phase will connect only to existing BLM routes. Trail construction may occur summer 2015. This route will provide a highly valued recreation amenity for locals accessing the Open Space property from the Rio Grande Trail. The trail planning effort referenced in #1, above, should take this new access trail into account when considering development of new singletrack trails in the northeast corner of the Crown unit.

(We fully support the detailed comments submitted to BLM by the Midvalley Trails Committee of Eagle County on this topic, see Memo for Record dated 4/24/14, item 2.b.ii.)

5. Trail 8325J and Trail 8325F should be revised to be open to mechanized only, not motorcycle use as shown on the Zone I, Alt. B. mapping. This revision will prevent motorcycles from mistakenly dropping down to the non-motorized Rio Grande bike path. In order to provide a continuous loop for motorcycles, Trail 8324F should be revised to allow for motorcycle use.

(We fully support the comments submitted to BLM by the Midvalley Trails Committee of Eagle County on this topic, see Memo for Record dated 4/24/14, item 2.a.)

6. Existing route in the vicinity of Trail 8324CB should be brought into the official travel route system as an out-and-back trail open to mechanized use. The trail leads to a very unique rock overlook that provides incredible views of the valley floor and surrounding mountains.

(We fully support the comments submitted to BLM by the Midvalley Trails Committee of Eagle County on this topic, see Memo for Record dated 4/24/14, item 2.c.)



7. RFMBA supports mechanized use of Trails 8331A and 8331B, as well as public use of motorized route 8322. The un-numbered foot and horse route south of these routes provides a connection to White River National Forest routes, many of which are foot & horse only or decommissioned. RFMBA has proposed an East Hay Park Trails Plan to the WRNF with the long term goal of reopening specific decommissioned routes to mechanized use. Once this is accomplished, Trail 8331A will grow in importance for mountain bikers as an access/exit route to WRNF land.
8. RFMBA continues to supports many of the specific comments we submitted during an earlier draft of the RMP on 1/16/12. Many of these comments will be addressed during a future trails planning process as described in #1, above. These comments are added to this submission.
9. Seasonal winter trail closures for wildlife can be supported for this unit in general. As proposed, the SRMA will be annually closed to motorized and mechanized use from 12/1 to 4/15. However, we recommend studying the closure boundaries in detail in order to provide limited areas where fat tire bike riding can be enjoyed as a winter time recreational pursuit. These areas would act as pressure relief valves to ensure that the majority of winter seasonal closure areas are not infringed upon. These areas should be determined at a future date as summer time bike routes are further developed in the area. In general, the lower area of the Prince Creek trails is already seeing winter time use by fat tire bike enthusiasts. The terrain and trails they are utilizing is limited by the need for an already packed down trail; this limits the mileage of trail and acreage of area that is reasonable available for fat tire biking.

## **ZONE J / (BASALT)**

1. To provide Basalt residents mechanized recreation opportunities, revise Trails 8335A and 8335B from foot/horse only to allow for mechanized use. These trails are envisioned as being rerouted in the future in order to create a sustainable up and down route connecting the Grace-Shehi Bike Park to the ridge of Light Hill (motorized route 8335). Revising the allowed use of 8335A and 8335B is logical given the number of motorized routes that are also open to mechanized use on Light Hill.

This revision and eventual trail reroute will provide an alternate access to the Hay Park trail system (on WRNF land), utilizing BLM land described in #3, below. The main existing motorized route on the ridge of Light Hill should be improved or rerouted at specific section in order to provide a more sustainable trail and a more enjoyable riding experience for local residents.

2. Town of Basalt is pursuing easement access through private property near the western end of the Arbaney Mesa BLM unit. In the future, this sunny aspect, just above down town



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Basalt, would be an ideal candidate for a new singletrack mechanized trail that would connect up to the Arbaney-Kittle Trail where it currently gains the ridge. The route might roughly parallel the existing foot/horse only route currently shown in this area on the Alt. B. mapping. This would be a very high value trail amenity to Town of Basalt locals who currently are very likely to drive to a trailhead out of town when looking to ride their mountain bikes.

3. At the L-shaped BLM parcel south of Light Hill, east of Hay Park. This route is not currently shown on the map, existing route not shown on the Alt. B mapping provides a connection to White River National Forest routes, many of which are foot & horse only or decommissioned. RFMBA has proposed an East Hay Park Trails Plan to the WRNF with the long term goal of reopening specific decommissioned routes to mechanized use. Once this is accomplished, the described route will grow in importance for mountain bikers as an access/exit route to WRNF land, with continuous public lands connecting Basalt to the Forest.
4. Seasonal winter trail closures for wildlife can be supported for this unit in general. However, we recommend studying the closure boundaries in detail in order to provide limited areas where fat tire bike riding can be enjoyed as a winter time recreational pursuit. These areas would act as pressure relief valves to ensure that the majority of winter seasonal closure areas are not infringed upon. These areas should be determined at a future date as summer time bike routes are further developed in the area.

We look forward to working with BLM staff to achieve approvals for the route system improvements proposed within the above comments. We look forward to continuing our partnership with the BLM, to fulfill our mission of creating the best possible system of trails for mountain bike use throughout the Roaring Fork Valley.

On behalf of the Board and Members of RFMBA,  
Most sincerely,

Sincerely,

Mike Pritchard

RFMBA, Executive Director  
(970) 948-3486

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(sent via email to: [co\\_crvrmp@blm.gov](mailto:co_crvrmp@blm.gov), [cormpkg@ttsfo.com](mailto:cormpkg@ttsfo.com), [cormpkg@blm.gov](mailto:cormpkg@blm.gov))

**From: Roaring Fork Mountain Bike Association**, 1212 Vine St., Aspen, CO 81611  
Mike Pritchard, Board President, 970-948-3486

**Date: 1/16/2012**

**Re: Comments regarding the BLM's Colorado River Valley Draft Resource Management Plan and Environmental Impact Statement**

On the following pages, please find detailed comments for the BLM Zones that are within our regional area of concern, along with attached zone maps that provide route suggestions & proposals.

### **ZONE I / (PRINCE CREEK)**

#### Significant issues:

- Currently, there is true potential for collisions between user groups. Motorcycles ascend quickly; mountain bikes descend quickly. Combined with the dense scrub oak vegetation surrounding the trails in this zone, serious injuries may result.
- Habitat protection can be improved through seasonal trail closures.
- Transient camping, largely unregulated, is a burden on the lands along Prince Creek Rd. Camp sites should be removed along the road to reduce this problem.
- Management of the land for multiple uses.

#### Access:

- Better access needs to be provided near the Rock Bottom Ranch, via the Rio Grande bike path. This will help keep trails close to population centers, cutting down on driving to trailheads to result in an overall reduced carbon footprint for the local community.
- Plan routes that will provide access to trails in Hay Park (WRNF) and Light Hill (Zone J).

#### Alternative Choice:

From a multiple use standpoint, the available alternatives do not meet the needs of the different user groups. Our preference is for Alternative B, which would designate this zone as an SMRA. However, RFMBA has informally met with CBTRA, and in brief, our two organizations agree that motorcycles are appropriate on some existing single track, while we further agree that other trails

should be mechanized only, as they present safety and trail sustainability issues if motorcycle use were to continue. The proposed trails to be shared are “N. Porcupine”, “Lower Outtie”, and “Upper Buckhorn”. The trails that they agree do not work well for motorcycles are “Skull Bucket”, “Innie”, & “Outtie”. There was also a concern that motorcycles should be routed away from trails close to the BLM access provided via Rock Bottom Ranch’s easement, in order to prevent a motorcycle from accessing the Rio Grande paved bike path. Thus, “Buckhorn Traverse” should also remain non-motorized. These trails are identified accordingly on the attached map. We suggest that Alternative B be revised to conform with the above route designations.

Specific Comments (each comment number is referenced on the attached map):

- 1) Trail 23913, “Father of Ginormous” should be a downhill travel only trail due to the blind corners and fast decent. The top 1/3 of this trail leading to the top of the Crown needs to be reworked due to overgrowth. As mountain biking should appeal to all level of riders, consideration should be given to include additional features (roll over jumps & crossovers) which will heighten the enthusiasm of the younger generation of riders, and allow intermediate riders the ability to advance their riding skill set.
- 2) Create a more sustainable access route to The Crown; current access uses an easement through private property (ACES - Rock Bottom Ranch) that is a steep old 4wd route which is not sustainable.
- 3) Reroute the “Creekside” trail so that it avoids adjacent private property.
- 4) As proposed in the citizen’s group discussions, have a connector trail from “Innie” to the “Father of Ginormous” to keep bikes off of roads that can present conflicts with motorized users.
- 5) As there are no single track trails on the El Jebel side of the crown, consideration needs to be given for a trail that starts at the top of the Crown and connects to the southeastern side of the “Buckhorn Traverse” trail. This gives El Jebel & Basalt residents the opportunity to easily access single track without having to drive to a trailhead.
- 6) One of the highest priorities for the Roaring Fork Mountain Biking Association has been to identify how one riding zone can interconnect to the next. This is important as it allows for riders to journey beyond a small area enhancing the amount of time a person can spend on a bike and their riding experience. As Prince Creek is the natural stepping stone to the Hay Park area on the adjacent WRNF, it makes sense to have a route system interconnecting the two as proposed on the attached map.
- 7) Safety issues are of a major concern descending the road from Hay Park. It’s a heavily traveled narrow road which can result in a tragic consequence between vehicles and bikes. This can be easily mitigated by adding a trail descending on BLM land from the Thomas Lake trailhead parking lot.

**ZONE H / (NORTH THOMPSON CREEK)**

Significant issues:

- Alleviate trailhead overcrowding and overuse of other popular nearby BLM areas. The nearby Red Hill SRMA documents 55,000 annual user visits. As the valley experiences additional growth and the popularity of recreational opportunities continue to increase, local trails will continue to see more use. North Thompson can alleviate this pressure.
- To provide cohesive relations between recreational users and ranchers, potential new trail layouts should work to limit the proximity of trails to private ranch land located on the valley floor adjacent to the Town of Carbondale. See comments below under “Trail improvement or additions”.
- Suggest improving habitat protection through seasonal trail closures.

Access:

- The existing north side access provides close to home opportunities which helps reduce our carbon footprint.
- Consideration should be given as outlined below on allowing for interconnectivity to the Thompson Creek area.

Alternative choice:

- We support the Preferred Alternative, B, as it is the best choice for multiple uses, while also limiting resource extraction. If Alternative C is chosen, revisions should be made to allow current mountain bike use to continue.

Specific Comments (each comment number is referenced on the attached map):

1) Although Red Hill experiences 55,000 users at the trailhead, only a small number (less than 300) journey to the northern most trails. The same can hold true for N Thompson. Although there will be a lot of users at the trailhead because of the time and efforts required, very few users will venture to the far southern flanks of this zone. Thus, a distant loop on the south side of the Lorax will cause little disruption to cattle, or as a noted rancher concern, chasing wildlife from BLM lands to the Carbondale valley floor ranching lands. Seasonal closures could also be used to address this concern.

2) Having connectivity with other riding zones is a high priority of the Roaring Fork Mountain Biking Association. As N. Thompson allows for easy access to the Thompson Creek trails, a loop on the western flank of this area meets this objective. This also meets the desires of the local ranchers by keeping trails away from the private ranching land in the Carbondale valley floor.

**ZONE G / (RED HILL & FISCHER CREEK)**

Significant issues:

- Overuse of trails.
- Habitat protection through seasonal closures.

Access:

- If the Sutey Ranch/Two Shoes land exchange materializes, access should be provided from the north side of Red Hill to alleviate overuse pressure on the Carbondale side.
- Trail access from Spring Valley/CMC to Fischer Creek will foster outdoor recreation opportunities for those students at the CMC campus and neighboring residential communities.

- Provide a new access route from valley floor at El Jebel to access WRNF land on Basalt Mountain.

Alternative choice:

- We support the Preferred Alternative, B. If Alternative C is chosen, revisions should be made to allow current mountain bike use in the Fischer Creek area to continue.

Specific Comments (each comment number is referenced on the attached map):

1) As noted above, a trail accessing Spring Valley/CMC will provide easy opportunities for the local college community to access trails. Many of these students have little to no means, so driving to trails can be limited opportunity, or simply out of the question. Access from this point will allow a perfect back door access trail for the college residents and the neighboring residential areas. Additionally, this will provide a potential loop to Red Hill as outlined in #2 below.

2) Although the hillside is steep, there is potential to create a sustainable trail accessing Red Hill from lower Cattle Creek. This would provide a solution that alleviates the pressure of the significant number of users accessing this SRMA from the Carbondale trailhead, all while providing easier access for the Ironbridge neighborhood and the Glenwood area.

3) If access is gained through a lower El Jebel subdivision as currently being pursued through Mid Valley Trails, the BLM lands on the Western Flank of Basalt Mountain would provide access to the existing Basalt Mountain (WRNF) trail system.

**ZONE F / (GREATER GLENWOOD AREA)**

Significant issues:

- This is the most populated area of all zones, yet there are the fewest trails in all of the zones located within this BLM jurisdiction.

Access:

- Easy access is available from many areas.

Alternative choice:

- As Alternatives B & C would effectively close many of the 4 wheel drive roads that currently exist in this zone, we suggest that many of these routes be revised in Preferred Alternative B to remain open to Mechanized (mountain bike) use.

Specific Comment (each comment number is referenced on the attached map):

1) As Glenwood is the most populated area in the valley and also heavily relies on tourist revenue, additional trails are needed to support this zone. Accessing the flat tops from Glenwood would provide a classic trail opportunity to reach high alpine zones with large vertical climbs/descents. If the trail head was placed at the South Canyon exit of I-70, there could also be a trail system that heads south from the Interstate.

## ZONE J / (BASALT)

### Significant issues:

- Interconnectivity between other zones as described below.
- Habitat protection through seasonal closures, to be considered at only the most sensitive locations.

### Access:

- Close to Basalt.

### Alternative choice:

- We support the Preferred Alternative, B.

### Specific Comment (each comment number is referenced on the attached map):

1) To provide Basalt residents an alternate access to the Hay Park trail system (on WRNF land), a new route connection from the north side of Light Hill makes sense. The main existing route on the ridge of Light Hill should be rerouted to provide a more sustainable trail and a more enjoyable riding experience for local residents.

We look forward to working with BLM staff to achieve approvals for the route system improvements proposed within the above comments. Alternative B, with some key revisions, can be a truly successful "Preferred Alternative" that will provide a strong framework for managing these lands over the next twenty five years or, We look forward to continuing our partnership with the BLM, to fulfill our mission of creating the best possible system of trails for mountain bike use throughout the Roaring Fork Valley.

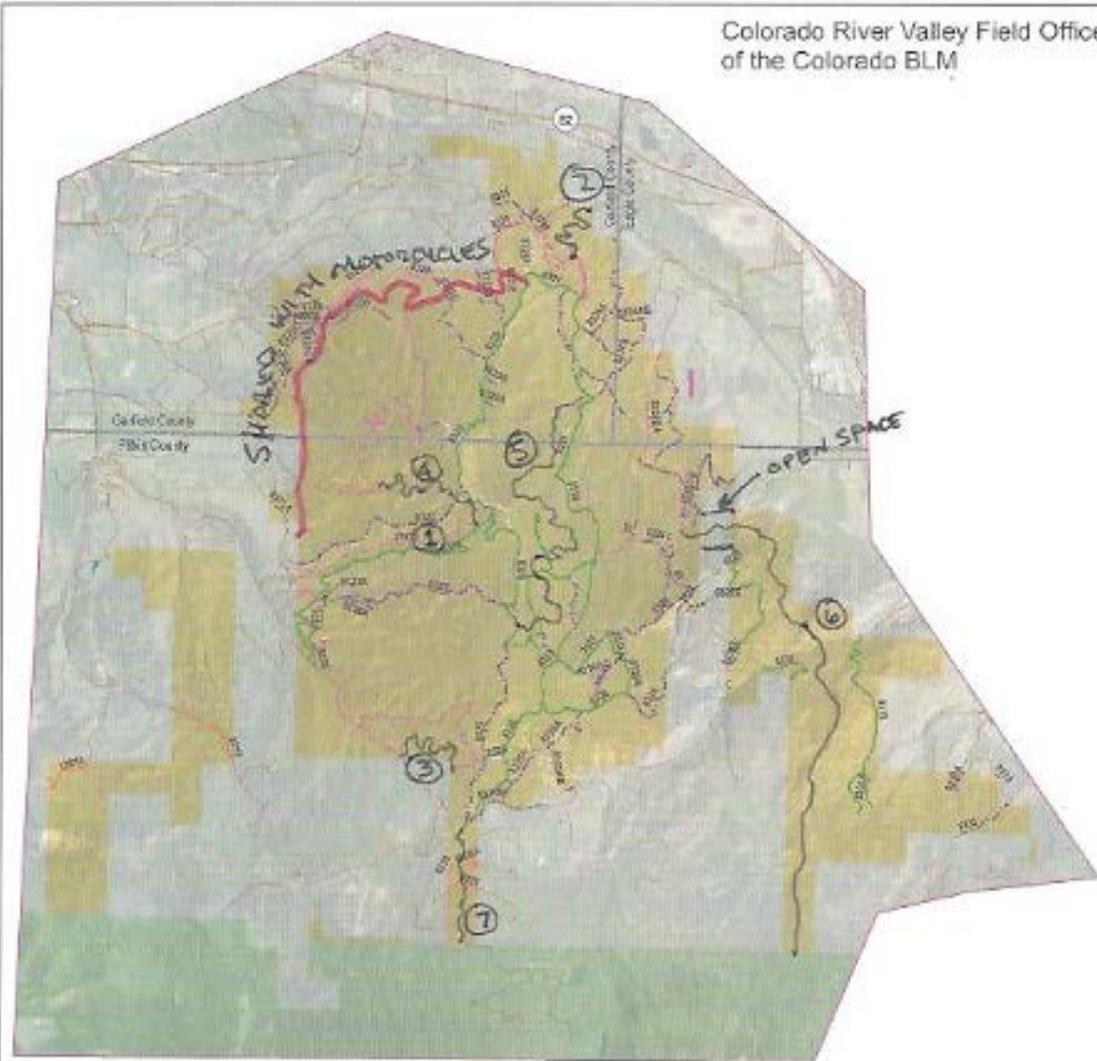
On behalf of the Board and Members of RFMBA,  
Most sincerely,



Mike Pritchard  
Roaring Fork Mountain Bike Association, Board President

# ZONE I PRINCE CREEK

Colorado River Valley Field Office  
of the Colorado BLM



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data.

### Public Route Designations

- Full-Size Vehicle
- ATV (50' or less)
- Motorcycle
- Mechanized
- Post/Horse Only
- Foot Only
- Administrative Route
- Rehabilitate
- Routes Outside BLM Lands

\*Note: Administrative motorized use may be authorized by the BLM on any public route.

Travel Management Zone

- Cities
- Planning Area Boundary
- County Boundary

### Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Department of Energy
- Private
- State
- US Forest Service

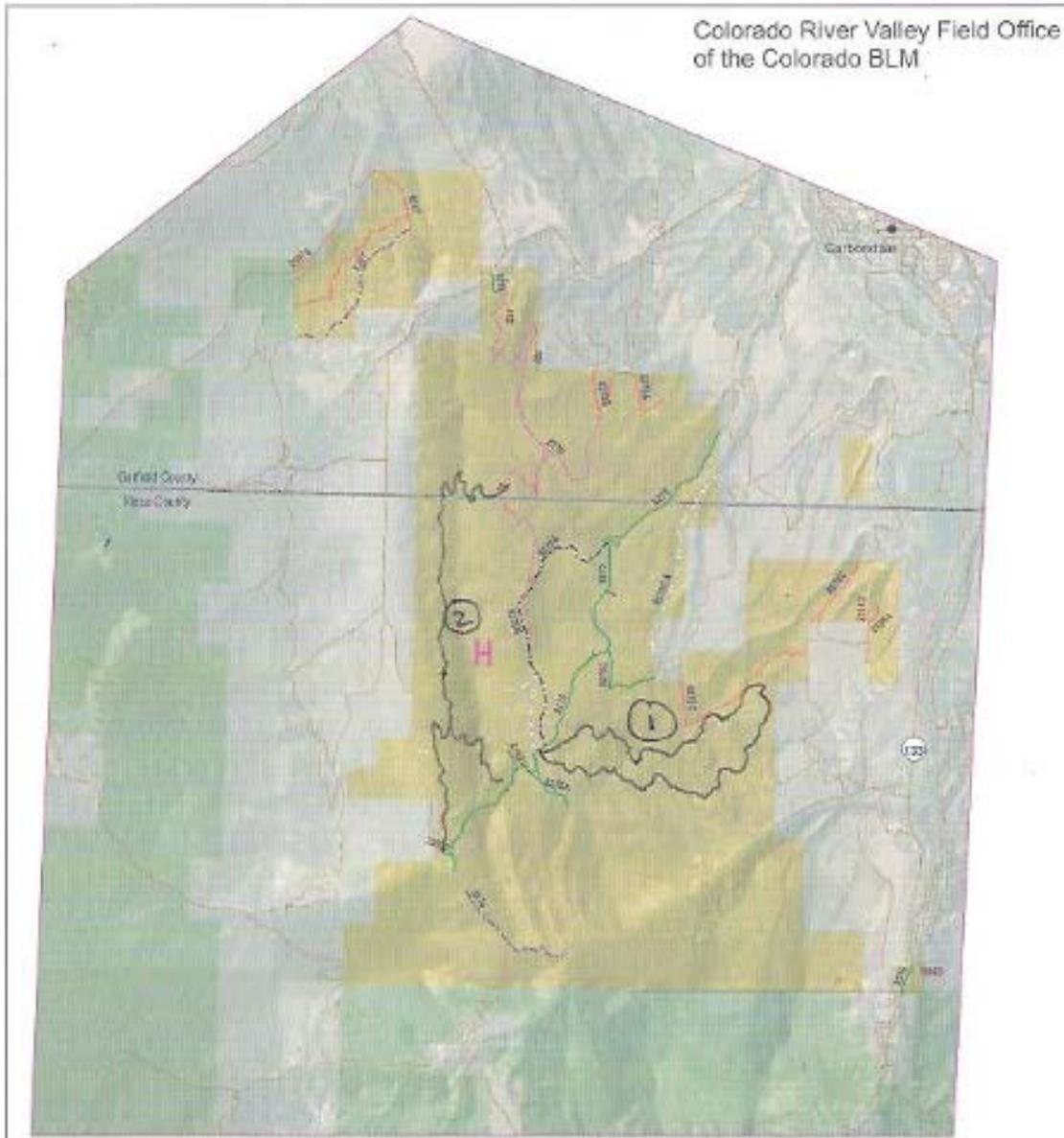
### Overall Location Map



Alternative C Travel Routes in Zone I

# ZONE H NORTH THOMPSON

Colorado River Valley Field Office  
of the Colorado BLM



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for a division or separate use with other data.



### General Location Map



### Public Route Designations

- Full-Size Vehicle
- ATV (50" or less)
- - - Motorcycle
- - - Mechanized
- - - Foot/Horse Only
- - - Foot Only
- Administrative Routes
- - - Rehabilitate
- Routes Outside BLM Lands

\*Note: Administrative motorized use may be authorized by the BLM on any public route.

**H** Travel Management Zone

- Cities
- Planning Area Boundary
- County Boundary

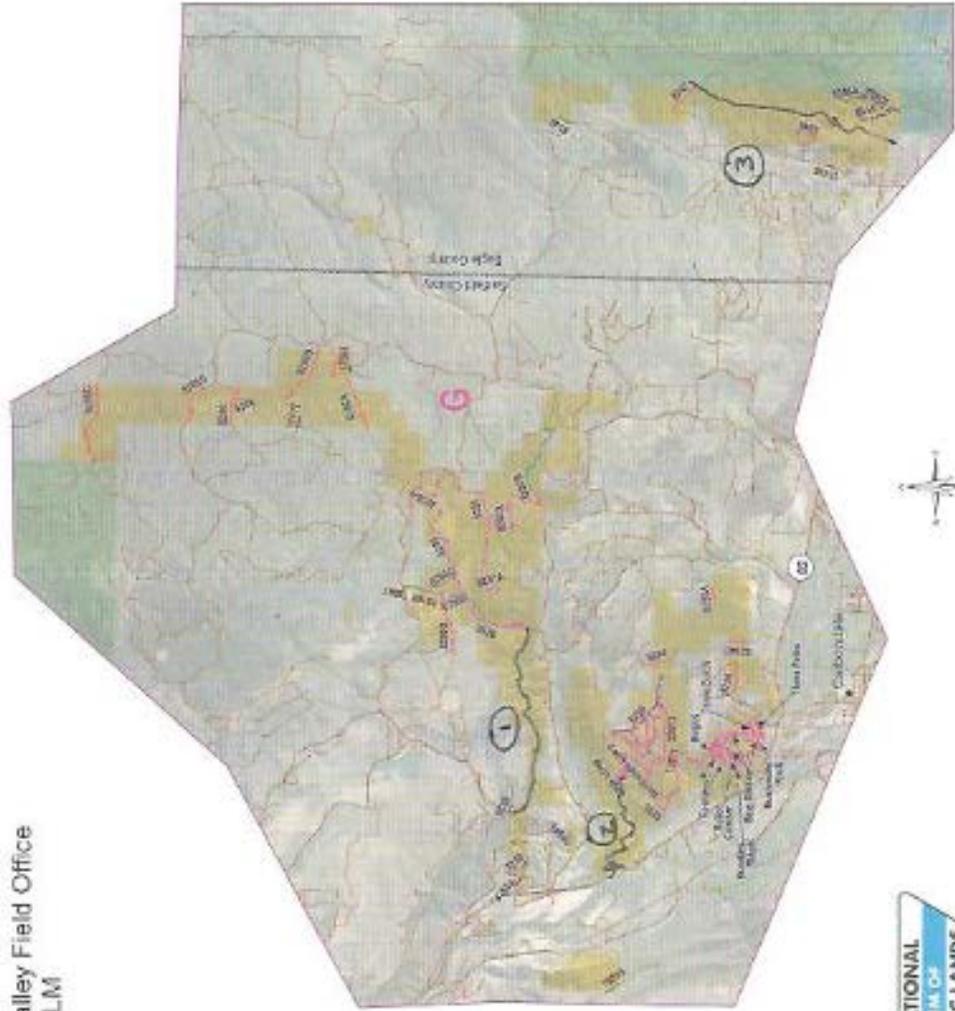
### Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Department of Energy
- Private
- State
- US Forest Service

Alternative B Travel Routes in Zone H

# ZONE G RED HILL/FISCHER CREEK

Colorado River Valley Field Office  
of the Colorado BLM



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregated use with other data.



### Public Route Designations

- Full-Size Vehicle
- ATV (50" or less)
- - - Motorcycle
- - - Mechanized
- - - Foot/Horse Only
- - - Foot Only
- - - Admin/In Route
- - - Seasonable
- - - Routes Outside BLM Lands

\*Note: Administrative motorized use may be authorized by the BLM on any public route.

**G** Travel Management Zone

- Cities
- ▭ Planning Area Boundary
- ▭ County Boundary

### Land Status

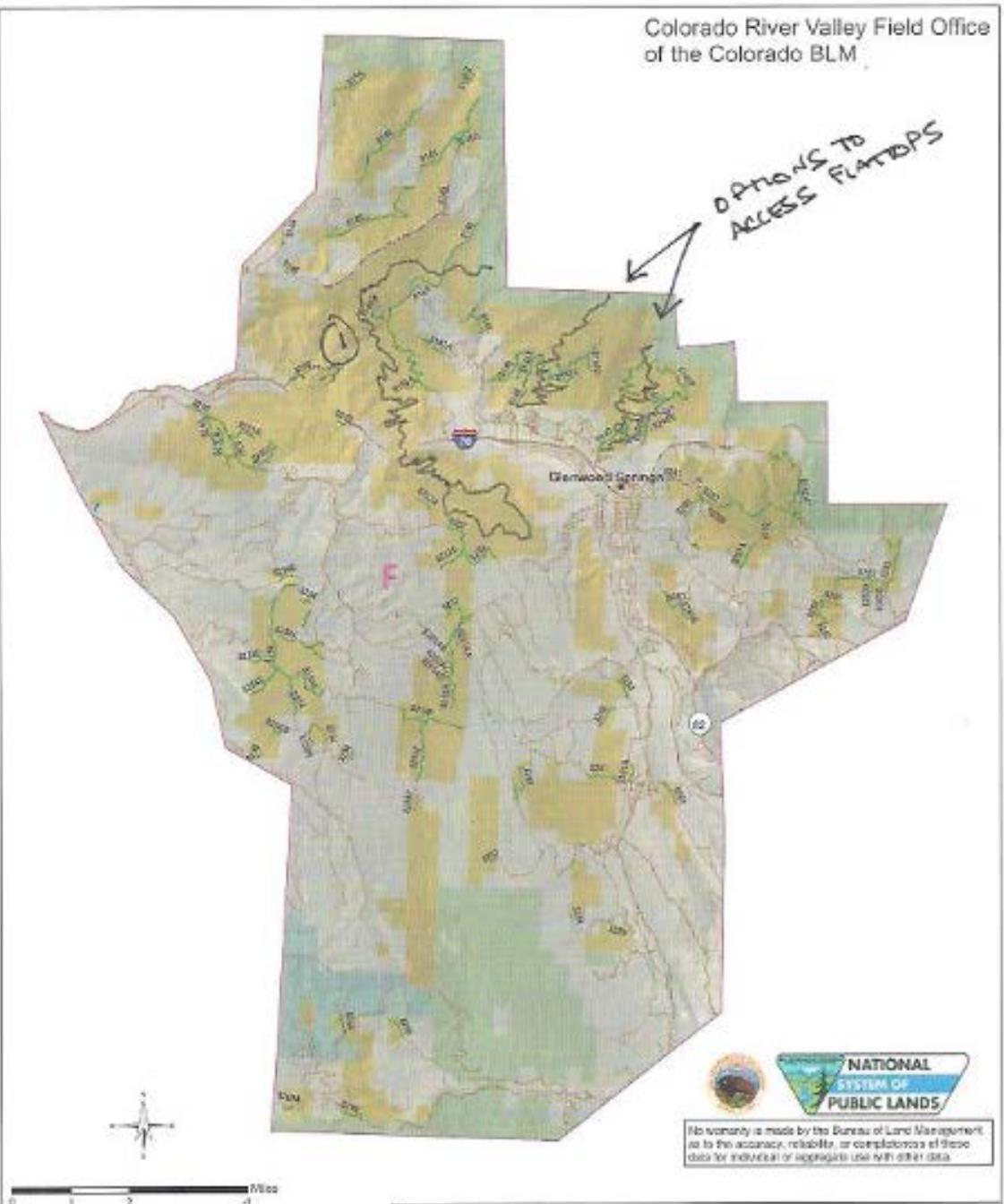
- Bureau of Land Management
- Bureau of Reclamation
- Department of Energy
- Private
- State
- US Forest Service

Alternative B Travel Routes in Zone G

# ZONE F GLENWOOD

Colorado River Valley Field Office  
of the Colorado BLM

OPTIONS TO  
ACCESS FLATTOPS



NATIONAL SYSTEM OF PUBLIC LANDS  
No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data.

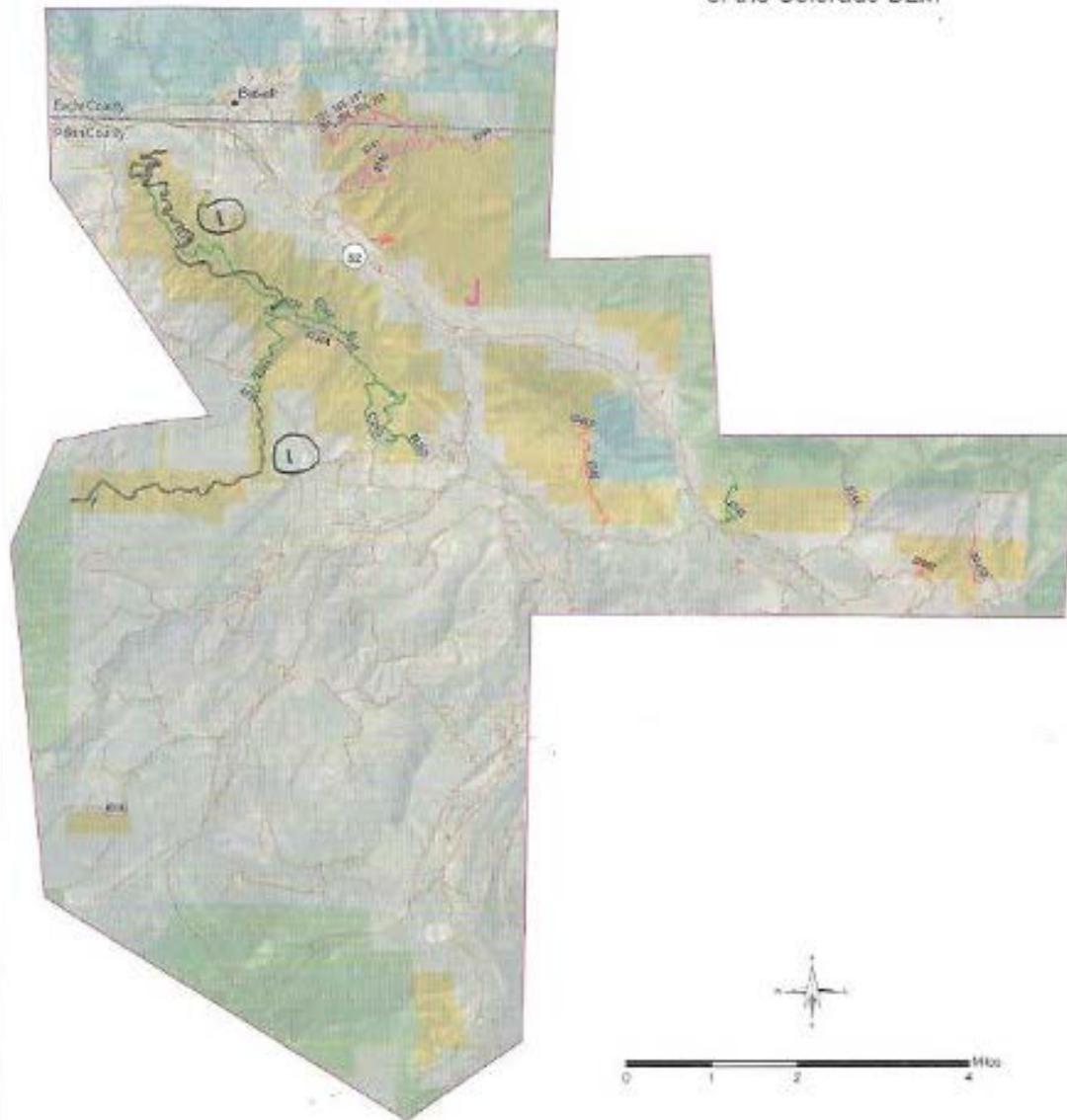


Travel Management Zone
Cities
Planning Area Boundary
County Boundary
<b>Public Route Designations</b>
Full-Size Vehicle
ATV (50" or less)
Motorcycle
Mechanized
Foot/Horse Only
Foot Only
Rehabilitate
Routes Outside BLM Lands
<b>Land Status</b>
Bureau of Land Management
Bureau of Reclamation
Department of Energy
Private
State
US Forest Service

Alternative A Travel Routes in Zone F

# ZONE J BASALT

Colorado River Valley Field Office  
of the Colorado BLM



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data.

### Public Route Designations

- Full-Sized Vehicle
- ATV (50" or less)
- - - Motorcycle
- - - Mechanized
- - - Foot/Horse Only
- - - Foot Only
- Administrative Route
- - - Rehabilitate
- Routes Outside BLM Lands

\*Note: Administrative motorized use may be authorized by the BLM on any public route.

Travel Management Zone

- Cities
- Planning Area Boundary
- County Boundary

### Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Department of Energy
- Private
- State
- US Forest Service



Alternative B Travel Routes in Zone J



January 14, 2012

BLM CO  
Colorado River Valley Field Office  
2300 River Frontage Road  
Silt, CO 81652

RE: Colorado River Valley Field Office Resource Management Plan Revision, Draft RMP/Environmental Impact Statement

Dear Planning Team:

Thank you for taking the time to consider this feedback on Draft Colorado River Valley Field Office RMP. IMBA considers the BLM to be at the forefront of managing mountain bicycling on public lands, and the CRVFO is no exception. The BLM is the only agency to have a mountain bicycling specific strategy and has been very receptive to trying a variety of partnership concepts to develop progressive trails and effective management regimes. We encourage the CRVFO to continue to look for opportunities to partner with local mountain bicyclists to enhance the mountain bicycling experiences on these beautiful lands and to further serve the needs of nearby communities.

We support Alternative B, the preferred alternative, and would like to add the following comments:

### **Comprehensive Trail System Planning**

The draft states “mountain biking [is] common throughout the CRVFO, but extreme popularity for [this activity] is concentrated in certain communities.”<sup>1</sup> This is very true, however, it leaves out a critical component of how mountain bicyclist view and visit these areas. Successful mountain bike management depends on integrated networks of trails rather than a collection of isolated areas.

As a landscape scale management model we recommend creating a “Hub and Spoke” system allowing for easier management, providing opportunities for a range of trail experiences, access to other recreation resources and destinations, as well as adjacent public lands. An example of the model is Fruita, Colorado and Moab, Utah. Both cites host extensive stacked loop trails and trail systems and serve as riding Hubs connected by the Kokopelli Trail. While this example is huge in scale, a proportionate system could also serve the Colorado River Valley.

A Hub is an area in the front or side country that is relatively easy to access. The area features a higher trail density with a stacked loop system that could offer beginner, intermediate and/or expert trails, as dictated by the management needs of the area and the landscape. A Hub could also include hiking only trails, and trails that provide access to other recreation resources such as rock climbing sites or river access points.

The missing components of the draft RMP are the Spoke trail connections between the Hub areas and other destinations such as home, community amenities, other developed recreation sites and into the backcountry. Ensuring that the areas are interconnected creates benefits such as allowing trails to be used for transportation as well as recreation. This also allows recreational riding to begin from home, eliminating the need to drive to the trailhead and adding value to local properties.

A fully planned and developed system of interconnected Hubs and Spokes will form an intentional and integrated trail network that meets the experiential and access needs of a majority of trail users. If these experiential and access needs are proactively managed through system wide trail-planning incidents of conflict and resource degradation can be avoided. **We ask that the RMP incorporate a comprehensive trail planning mechanism to work with local mountain bikers and develop an integrated trail network.**

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<sup>1</sup> Draft RMP/EIS at 3-152

2 BLM Manual 6302.13(D)(11)





## **Bicycles Do Not Harm The Wilderness Character of The Land**

The DRMP will prohibit mountain bicycle (mechanized) access in administratively designated Wilderness Study Area(s) (WSA). The Interim Management Policy for Lands Under Wilderness Review requires that the area be managed so the wilderness character is not impaired. The DRMP presents no analysis or evidence showing that mountain bicycling, on existing trails, would impair the wilderness characteristics of these areas.

We believe the presumption that mountain bicycling would per se impair the wilderness characteristics of the land is derived, in part, from a fundamental misunderstanding of the different disciplines of the sport. The most publicized mountain bicycling shows racing or “extreme” riding events, which are important aspects of the sport, but they are neither the whole picture nor the most common experience. The type of riding that would occur in remote backcountry areas is much more like hiking or horseback riding, where the speed and distance are less important than the views and company you are with. Due to the remoteness and difficulty of these backcountry rides they are attempted by a relatively small number of people. We ask that the DRMP address the impacts that mountain bicycles would have on wilderness characteristics and alternatives for addressing those impacts. We also request that where backcountry routes are to be closed alternative routes are identified to ensure that an entire experiences and economic opportunities are not lost.

The BLM has never adopted a position that mountain bicycles are incompatible with preservation of wilderness characteristics and has always supported the use of bicycles for exploring the backcountry. The BLM manual specifically states, “Limited or existing motorized or mechanized (e.g., mountain bike) access may be consistent with protection of wilderness characteristics.”<sup>2</sup> The same section also states, “Designated routes of travel may be identified for motorized or mechanized access.” These sections were revised in February of 2011, and we have not seen any more recent direction indicating that this is no longer Bureau policy. If the Colorado River Valley Field Office believes that the WSAs under their jurisdiction necessitate this additional measure to protect the wilderness characteristics we ask that the BLM explain their departure from the Manual’s guidance.

Managing bicycle access in WSAs under a designated route system until such time as Congress acts to designate the area as Wilderness or release it to multiple use management will preserve the wilderness characteristics without unduly constraining a low impact recreational activity. **We ask that where bicycle use existed prior to designation or trail access would be necessary for system connectivity bicycles be allowed to use designated routes within Wilderness Study Areas.**

## **Specific Mountain Bicycling Areas in The Colorado River Valley Field Office**

Under the current draft the Hardscrabble area is to be designated as an ERMA. This area is an invaluable asset to the local community of Eagle. The areas trails connect the town to many popular rides on both BLM and adjoining Forest Service lands. The area is also an excellent area for beginners and children to learn the basics of this sport. Our understanding of the ERMA designation is that it will limit the ability to complete the final trail construction necessary to complete the community trail plans. Please clarify what trail construction activity can occur under the ERMA and SRMA designations.

IMBA supports the more detailed submission from of the Roaring Fork Mountain Bike Association. SRMA and ERMA designations for those areas that serve as “Hubs” for local mountain bikers is an excellent management strategy. Prince Creek, North Thompson Creek, Red Hill and Fisher Creek are all areas where mountain bicycling should be managed for extensive mountain bicycling activity. The BLM lands surrounding Glenwood and Basalt are critical components of an integrated network of trails as the connect riders to home. This local mountain bicycling organization possesses extensive knowledge of the landscapes and the trails that access them. We encourage the BLM to engage in collaborative planning with them and other local mountain bicyclists to develop a comprehensive trail system.

IMBA and our paid trail consulting team, Trail Solutions, are available for consultation on managing, designing and constructing sustainable trail systems. We greatly appreciate your efforts in to enhance outdoor recreation opportunities and

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2 BLM Manual 6302.13(D)(11)





thank you for accepting our comments. We look forward to continuing a productive relationship in the future. Please feel free to contact us, Ryan Schutz (303) 545-9011 Ext.112 ([ryan.schutz@imba.com](mailto:ryan.schutz@imba.com)) or Jeremy Fancher (831) 975-4522 ([jeremy.fancher@imba.com](mailto:jeremy.fancher@imba.com)) if we can be of further assistance.

Respectfully Submitted,

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Ryan Schutz  
Rocky Mountain Regional Director  
International Mountain Bicycling Association

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Jeremy J. Fancher, Esq.  
Attorney  
International Mountain Bicycling Association





**rfmba**  
ROARING FORK  
Mountain Bike Association

**Attn: Steve Smith, RAC Subgroup member, Liaison to N.W. RAC group.**  
**From: Roaring Fork Mountain Bike Association, Mike Pritchard, Board President**  
**Date: 8/17/2012**  
**Re: Comments to the Resource Advisory Council Subgroup, regarding the BLM's Colorado River Valley Working Draft RMP and EIS**

On the following pages, please find comments regarding the BLM zones that are within our regional area of concern. These comments are more detailed than time will allow for discussion during the limited time available during this series of meetings. Some points may help this group to achieve consensus. Detailed travel management planning should hopefully benefit from these comments, and some information may be incorporated within appendices for 'best management practice' guidelines.

### **The Crown**

Strongly agree that this zone should be managed as an SRMA, allowing for best possible outcomes for recreation. Not only would this allow for creation of new singletrack routes, but it will allow for a detailed level of management that can focus on lessening conflicts between user groups. The Crown will act as a significant pressure relief valve for growing recreation use on BLM lands. IF The Crown were not be managed as an SRMA, it would be important to designate other lands as an SRMA (including Thompson Creek).

#### **Significant issues:**

- Currently, there is true potential for collisions between user groups. Motorcycles ascend quickly; mountain bikes descend quickly. Combined with the dense scrub oak vegetation surrounding the trails in this zone, serious injuries may result.
- Habitat protection can be improved through seasonal trail closures.
- Transient camping, largely unregulated, is a burden on the lands along Prince Creek Rd. Camp sites should be removed along the road to reduce this problem.
- Management of the land for multiple uses, with goal of lessening conflicts between users.

#### **Access:**

- Better access needs to be provided near the Rock Bottom Ranch, via the Rio Grande bike path. This will help keep trails close to population centers, cutting down on driving to trailheads to result in an overall reduced carbon footprint for the local community.
- Plan routes that will provide access to trails in Hay Park (WRNF) and Light Hill.

While we feel that many of the trails on The Crown should be mechanized only as they present safety and trail sustainability issues if motorcycle use were to continue. Some trails may be appropriate for shared use with motorcycles: “N. Porcupine”, “Lower Outtie”, and “Upper Buckhorn”. The trails that do not work well for motorcycles are “Skull Bucket”, “Innie”, & “Outtie”. Motorcycles should be routed away from trails close to the BLM access provided via Rock Bottom Ranch’s easement, in order to prevent a motorcycle from accessing the Rio Grande paved bike path. Thus, “Buckhorn Traverse” should also remain non-motorized.

#### Specific Comments:

- 1) Trail 23913, “Father of Ginormous” should be a downhill travel only trail due to the blind corners and fast decent. The top 1/3 of this trail leading to the top of the Crown needs to be reworked due to overgrowth. As mountain biking should appeal to all level of riders, consideration should be given to include additional features (roll over jumps & crossovers) which will heighten the enthusiasm of the younger generation of riders, and allow intermediate riders the ability to advance their riding skill set.
- 2) Create a more sustainable access route to The Crown; current access uses an easement through private property (ACES - Rock Bottom Ranch) that is a steep old 4wd route which is not sustainable.
- 3) Reroute the “Creekside” trail so that it avoids adjacent private property.
- 4) As proposed in the citizen’s group discussions, have a connector trail from “Innie” to the “Father of Ginormous” to keep bikes off of roads that can present conflicts with motorized users.
- 5) As there are no single track trails on the El Jebel side of the Crown, consideration needs to be given for a trail that starts at the top of the Crown and connects to the southeastern side of the “Buckhorn Traverse” trail. This gives El Jebel & Basalt residents the opportunity to easily access single track without having to drive to a trailhead.
- 6) One of the highest priorities for the Roaring Fork Mountain Biking Association has been to identify how one riding zone can interconnect to the next. This is important as it allows for riders to journey beyond a small area enhancing the amount of time a person can spend on a bike and their riding experience. As Prince Creek is the natural stepping stone to the Hay Park area on the adjacent WRNF, it makes sense to have a route system interconnecting the two (as proposed on a previously submitted map).
- 7) Safety issues are a major concern descending the road from Hay Park. It’s a heavily traveled narrow road which can result in a tragic consequence between vehicles and bikes. This can be easily mitigated by adding a trail descending on BLM land from the Thomas Lake trailhead parking lot.

### **NORTH THOMPSON CREEK**

We can agree that the southern portion of this landscape should be managed as an ACEC. An existing route within this portion of land would be closed to continued use. We disagree that the northern portion of this landscape should be managed as a Land with Wilderness Characteristics. While we support the current staff recommendation that the Lorax trail remain open to mechanized

travel, and an existing two track route remain open to motorized travel, we also feel that this land should be designated in such a manner that future limited trail development would be allowed within the BLM's travel planning process. As was discussed by several members of this group, the northern portion of this land does not clearly qualify as a 'land with wilderness characteristics'. Were this land to be managed for multiple uses, we would recommend 1 or 2 additional singletrack mechanized routes to be developed through proper approval processes. IF The Crown were not to be managed as an SRMA, we would propose that this landscape could act as a pressure relief valve for growing recreation use, and would need to be managed as an SRMA.

#### Significant issues:

- Alleviate trailhead overcrowding and overuse of other popular nearby BLM areas. The nearby Red Hill SRMA documents 55,000 annual user visits. As the valley experiences additional growth and the popularity of recreational opportunities continue to increase, local trails will continue to see more use. North Thompson can alleviate this pressure.
- To provide cohesive relations between recreational users and ranchers, (IF land was to be managed as something other than an LWC) potential new trail layouts should work to limit the proximity of trails to private ranch land located on the valley floor adjacent to the Town of Carbondale. See comments below under "Trail improvement or additions".
- Suggest improving habitat protection through seasonal trail closures.

#### Access:

- The existing north side access provides close to home opportunities which helps reduce our carbon footprint.
- Consideration should be given as outlined below on allowing for interconnectivity to the Thompson Creek area.

#### Specific Comments:

1) Although Red Hill experiences 55,000 users at the trailhead, only a small number (less than 300) journey to the northern most trails. The same can hold true for N Thompson. Although there will be a lot of users at the trailhead because of the time and efforts required, very few users will venture to the far southern flanks of this zone (proposed to be an ACEC). Thus, a distant loop trail (IF land was to be managed as something other than an LWC) on the south side of the Lorax will cause little disruption to cattle, or as a noted rancher concern, chasing wildlife from BLM lands to the Carbondale valley floor ranching lands. Seasonal closures could also be used to address this concern.

2) Having connectivity with other riding zones is a high priority of the Roaring Fork Mountain Biking Association. As N. Thompson allows for easy access to the Thompson Creek trails, a loop trail (IF land was to be managed as something other than an LWC) on the western flank of this area meets this objective. This also meets the desires of the local ranchers by keeping trails away from the private ranching land in the Carbondale valley floor.

3) Provide a land management designation that would allow for future limited development of a trail that would create a loop system with the existing Lorax trail. A new route paralleling the western side of the land's primary ridge could serve this purpose.

## **RED HILL & FISHER CREEK**

Maintain SRMA status for Red Hill, and allow for an approval process that would allow new mechanized routes to be added to the travel management system. There is at least one route in Fisher Creek that can be seen via satellite photos that was missed during route inventory efforts.

Significant issues:

- Overuse of trails.
- Habitat protection through seasonal closures.

Access:

- If the Sutey Ranch/Two Shoes land exchange materializes, access should be provided from the north side of Red Hill to alleviate overuse pressure on the Carbondale side.
- Trail access from Spring Valley/CMC to Fischer Creek will foster outdoor recreation opportunities for those students at the CMC campus and neighboring residential communities.
- Provide a new access route from valley floor at El Jebel to access WRNF land on Basalt Mountain.

Specific Comments:

- 1) A trail accessing Spring Valley/CMC would provide easy opportunities for the local college community to access trails. Many of these students have little to no means, so driving to trails can be limited opportunity, or simply out of the question. Access from this point will allow a perfect back door access trail for the college residents and the neighboring residential areas. Additionally, this will provide a potential loop to Red Hill as outlined in #2 below.
- 2) Although the hillside is steep, there is potential to create a sustainable trail accessing Red Hill from lower Cattle Creek. This would provide a solution that alleviates the pressure of the significant number of users accessing this SRMA from the Carbondale trailhead, all while providing easier access for the Ironbridge neighborhood and the Glenwood area.
- 3) If access is gained through a lower El Jebel subdivision as currently being pursued through Mid Valley Trails, the BLM lands on the Western Flank of Basalt Mountain would provide access to the existing Basalt Mountain (WRNF) trail system.

## **GREATER GLENWOOD AREA**

Allow for an approval process that would allow new mechanized routes to be added to the travel management system.

Significant issues:

- This is the most populated area of all zones, yet there are the fewest trails in all of the zones located within this BLM jurisdiction.

Access:

- Easy access is available from many areas.
- As the RMP would effectively close many of the 4 wheel drive roads that currently exist in this zone, we suggest that many of these routes remain open to Mechanized (mountain bike) use.

Specific Comment:

1) As Glenwood is the most populated area in the valley and also heavily relies on tourist revenue, additional trails are needed to support this zone. Accessing the flat tops from Glenwood would provide a classic trail opportunity to reach high alpine zones with large vertical climbs/descents. If the trail head was placed at the South Canyon exit of I-70, there could also be a trail system that heads south from the Interstate.

**BASALT (Light Hill, Arbaney Mesa)**

Allow for an approval process that would allow new mechanized routes to be added to the travel management system.

Significant issues:

- Interconnectivity between other zones as described below.
- Habitat protection through seasonal closures, to be considered at only the most sensitive locations.

Access:

- Close to Basalt.

Specific Comments:

1) To provide Basalt residents an alternate access to the Hay Park trail system (on WRNF land), a new route connection from the north side of Light Hill makes sense. The main existing route on the ridge of Light Hill should be rerouted to provide a more sustainable trail and a more enjoyable riding experience for local residents.

2) Provide Basalt residents and tourists an alternate mechanized route to the existing Arbaney Kittle trail that accesses WRNF lands. The existing route is an old 4wd stock drive that is too steep for enjoyable riding, both up and down. An alternate route starting at the existing trailhead would separate pedestrian and mechanized use, and would provide a welcome amenity to the Town of Basalt.

We look forward to working with BLM staff to achieve approvals for the route system improvements proposed within the above comments. We support creating a strong framework for managing these lands over the next twenty plus years. We look forward to continuing our partnership with the BLM, to fulfill our mission of creating the best possible system of trails for mountain bike use throughout the Roaring Fork Valley.

On behalf of the Board and Members of RFMBA,  
Most sincerely,



Mike Pritchard  
Roaring Fork Mountain Bike Association, Board President