



# Taos Mountain Bike Association

*Create, Protect, Enhance*



Plan Revision Team  
Carson National Forest  
208 Cruz Alta Rd.  
Taos, NM 87571

Dear Plan Revision Team,

Please accept this letter from the Taos Mountain Bike Association (TMBA) of northern New Mexico, the local chapter of the International Mountain Bicycling Association (IMBA), on the Draft Land Management Plan for the Carson National Forest.

TMBA represents the diverse interests of mountain bikers in northern New Mexico through trail stewardship and maintenance, advocacy, community events, and public education. We support the Carson National Forest through hundreds of hours of volunteer time helping to maintain many of the beloved mountain bike trails on the forest, including the South Boundary, Lost Lake, and Continental Divide National Scenic Trail.

IMBA's mission is to create, enhance, and protect great places to ride mountain bikes. IMBA works with and through our local groups like Taos Mountain Bike Association and around the country to meet its own and their missions. IMBA and our local volunteers put over 700,000 hours annually into the maintenance and upkeep of trails, including clearing trees, building drainage, and repairing damage. IMBA maintains a Master Challenge Cost Share Agreement and formal Memorandum of Understanding with the Headquarters/Washington Office of USFS. IMBA's cooperation with the federal agency and its field-based staff has been long running and productive.

In general, we submit that since mountain biking and recreation continues to be a significant contributor to several important aspects of our community – including health, social opportunities, and sustainable income through tourism – they must be considered carefully in the Forest's land management plans and activities.

As such, we have identified below several areas where recreation in general – and mountain biking specifically – needs more complete and specific commitments from the Carson National Forest in order to achieve the Forest Service's priority of *enhancing recreation opportunities, improving access, and sustaining infrastructure*; all goals we share as an organization.

We approve of a blend of Alternative 2 and Alternative 3 as outlined below, and would like to see more emphasis placed on developing new and maintaining existing non-motorized infrastructure on the forest. As participation in non-motorized recreation such as mountain biking continues to increase in northern New Mexico, it is important that the Forest anticipate and meet this growing demand.

Also, while we support some of the proposed Recommended Wilderness Management Areas where they do not impact current mountain biking use on the Carson National Forest, we have identified several proposed RWMAs below that ban mountain bikes from currently used and beloved trails. This change would represent a significant detriment to the quality and quantity of outdoor recreation by interfering with existing uses enjoyed by forest visitors.

Please consider the following comments concerning the Land Management Plan:

# 1. Cliffs and Rocky Features (CRF)

## 1.1. Introduction (Page 82)

### 1.1.1. Amend final sentence to read:

"Cultural and provisioning ecosystem services are also associated with these features and include rock art, and mineral exploitation as well as recreational activities such as rock climbing, technical mountain biking, and hiking to scenic viewpoints."

*Discussion:* We feel it is important to recognize that rock climbing is not the only activity that is enhanced by the presence of cliffs and rocky features. Many of the best mountain bike trails found on public lands utilize these features to provide variety, challenge and rewarding recreation experiences. Specifically, several of the rock features near Tres Piedras Ranger District – an area that has long been a favorite of climbers – also present excellent opportunities for quality, sustainable mountain biking like nothing else currently available on the Carson National Forest.

# 2. Scenery (SCEN)

## 2.1. Scenery Desired Conditions (FW-SCEN-DC) (Page 125)

### 2.1.1. Modify Condition 4 to read:

"Visitors have opportunities to experience important scenic elements (e.g. fall colors, rolling grasslands, picturesque vistas, and green riparian corridors) via a variety of access methods including developed and dispersed recreation trails as well as improved and unimproved roads."

*Discussion:* It is important to note that while the scenery itself is valued, this scenery should also be able to be engaged with directly through the use of trails and other transportation corridors. Simply being able to see a beautiful scene from a pull-out at the edge of an area is not as valuable as being to discover that same scene through a variety of access methods. While both driving and hiking to the top of a mountain may provide the same "scene" it does provide the same experience.

# 3. Recreation (REC)

## 3.1. Introduction (Page 115)

### 3.1.1. Modify Paragraph 2 to read:

"The Carson is also one of New Mexico's premier destinations for year-round mountain biking, and includes both the "IMBA Epic" designated South Boundary Trail (#164) as well as the Continental Divide National Scenic Trail, which each attract recreational visitors from around the world."

*Discussion:* Page 116, Paragraphs 2 & 3 give quite a bit of detail about the motorized and snowmobile recreation. It is important to highlight that not only does mountain biking exist on the Carson, but it is a major draw for visitation.

### 3.1.2. Modify Paragraph 5 to read:

"Developed recreation provides a more accessible experience, with available parking, shelters, running water, or other facilities. Developed recreation experiences can also include interpretive nature trails, and purpose built mountain bike areas including skills features and engineered trails."

*Discussion:* Many areas with enhanced mountain biking opportunities on Federal, State or other land, include planned and purpose built structures intended to enhance the participants activity and help build skills. For example, parking areas that provide access to trails can include simple structures intended for mountain bikers to ride over or balance on. These features are considered part of the developed recreation experience, and should be included when thinking about developing or improving new or existing recreation opportunities on the forest. The establishment and maintain these structures can be managed as part of cooperative agreements or adopt-a-trail programs with TMBA and similar community-based organizations..

### **3.2. Recreation Desired Conditions (FW-REC-DC) (Page 117)**

#### **3.2.1. Modify Condition 3 to read:**

"A variety of high quality developed and dispersed recreation opportunities and activities (e.g. hunting, fishing, camping, hiking, rock climbing, mountain biking, horseback riding, family or group gatherings, fuelwood or piñon nut collecting, scenic driving, and off-highway vehicle use) are available to a diverse group of forest users, including persons with disabilities. Recreation opportunities are commensurate with the recreation setting and other natural and cultural resource values."

*Discussion:* It seems odd to include a specific list of recreation activities for important to traditional communities (FW-REC-DC 2) and not include a similar list important to other surrounding communities. While we support the specific inclusion of traditional community interests, we feel it is important that no single user group be granted more or less consideration when prioritizing desired recreational conditions.

#### **3.2.2. Modify Condition 4 to read:**

"Recreation opportunities and trail networks are maintained and expanded to accommodate growing user bases such as hikers, mountain bikers and horseback riders in such a way that stimulates the growth of the outdoor recreation tourism economies in surrounding communities."

*Discussion:* It is not enough to maintain current sustainable recreation opportunities as the number of residents and visitors continues to increase. Recreation should be expanded to meet increasing user needs, while helping the local economy – which depends in part on forest recreation – to take advantage of a growing user base of local and visiting mountain bikers.

### **3.3. Recreation Objectives (FW-REC-O) (Page 118)**

#### **3.3.1. Modify Objective 1 to read:**

"Develop and accomplish a comprehensive strategy that raises awareness of discouraged practices (e.g., illegal dumping, shooting practices, driving on closed roads) to promote visitor safety, during the 10-year period following plan approval."

#### **3.3.2. Modify Objective 3 to read:**

"Develop multiple collaborative partnerships for the recreation program to expand public awareness, understanding, and promote responsible behavior, during the 10-year period following plan approval."

*Discussion:* Multiple organizations currently exist to promote recreation activities on the Carson National Forest, including Enchanted Circle Trails Association, Taos Mountain Bike Association, Taos Saddle Club, Enchanted Circle Off-Highway Vehicle Association, among others. It behooves the Carson to engage with each of these, and not limit itself to only one.

#### **3.3.3. Add and modify Objective 8 (from Alternative 3):**

"Redesign existing trails, or construct new trails to create several purpose-built mountain biking trails as part

of multi-user trail systems."

*Discussion:* We do not advocate for the creation of a mountain-bike specific trail system, but would prefer that new and existing multi-user trail systems consider the specific needs of recreational mountain bikers in their design and implementation. This may include improving existing trails and sightlines to decrease the potential for user conflict, adding features specifically to enhance the mountain biking experience, or creating alternate lines that may be designated "downhill only" or "mountain bike only" where multi-user group traffic may not be optimal.

### **3.3.4. Add the following Objective:**

"Within 10 years of plan approval, 75 percent of the forest designated trail system is maintained to standard."

*Discussion:* It is vital to maintain existing trails, otherwise they may functionally cease to exist except on paper. Desired Condition 10 states, "Recreation resources and facilities are well maintained and function as intended," however there are no Objectives that directly support achieving this desired condition. Further, there is no specific mention of trails objectives, despite trails being arguably the most used recreational resource.

### **3.3.5. Add the following Objective:**

"Establish and utilize community-based partnership programs to address up to 25 percent of the deferred maintenance for core infrastructure needs such as water, sewer, roads, and trails within 10 years of plan approval."

### **3.3.6. Add the following Objective:**

"In response to increasing recreation demand, develop a minimum of three new non-motorized multi-use trail networks to provide increased opportunities for recreation activities including hiking, mountain-biking and horseback riding, within 10 years of plan approval."

*Discussion:* See TMBA Regional Conceptual MTB Trails Plan.

### **3.3.7. Add the following Objective:**

"Establish and maintain an adopt-a-facility program that engages specific user groups in the sustainable maintenance of trails, campgrounds and other recreation facilities within 1 year of plan adoption. Provide adopters with access to tools, resources and expertise needed to accomplish the sustainable maintenance of existing infrastructure."

*Discussion:* Whether included here, or in Management Approaches, we think it is important to formalize the goal of establishing an adopt-a-trail program so that user groups such as TMBA can take a more active and autonomous role in maintaining area trails and other resources.

### **3.3.8. Add the following Objective:**

"Other forest resource management activities that adversely affect recreation opportunities are mitigated upon completion to restore those recreation opportunities to their original quality, or in the event the alteration is unable to be remediated, new equivalent recreational opportunities are created within the area to replace those that have been lost."

*Discussion:* Where necessary and important activities such as forest thinning, fire suppression, and etc affect existing recreational trails, it is vital that these trails be restored or equivalent opportunities be created elsewhere. Already there is a lack of trail infrastructure on the forest and therefore it is important to ensure there is no net loss of opportunity due to other activities.

### **3.3.9. Re-add draft Objective 5:**

"Reduce the backlog of needed maintenance (i.e., deferred maintenance) at developed recreation areas by 50 – 60% from baseline levels, during the 10-year period following plan approval."

*Discussion:* We note this was removed in this version with the justification that this is not "within the Carson's ability to control". We are concerned that if the Carson National Forest does not have the ability to determine the maintenance of developed recreation, then this neglect comes at the expense of both the resource and stakeholders. Opportunities exist – and more are being developed – for organized user groups to significantly assist the CNF in remedying the deferred maintenance backlog.

### **3.4. Recreation Guidelines FW-REC-G (Page 118)**

#### **3.4.1. Add the following Guideline:**

"Trails are managed to meet management objectives based on trail class and designed use."

#### **3.4.2. Add the following Guideline:**

"Development of new sustainably-built recreation trails should consider current and growing recreational use groups including hikers and mountain bikers."

*Discussion:* There should be some specific mention of trails, and trail expansion to meet growing needs in the guidelines as trail usage makes up a significant share of recreational usage on the forest.

### **3.5. Management Approaches for Recreation (Page 119)**

#### **3.5.1. Add the following Approach:**

"Consider partnering with volunteers, mountain biking organizations, other government agencies, cooperators, and permit holders to help co-manage sustainable mountain biking opportunities, including planning, design, implementation, operations, and maintenance of mountain biking trails."

*Discussion:* In addition to the general "recreation" management approach, we recognize that mountain biking has specific needs and interests that are separate from (though typically complementary to) general recreation / trail management needs. We would like to ensure that the Forest reaches out to organizations such as Taos Mountain Bike Association when making decisions affecting mountain biking.

Note: this addition is similar to the proposed wording under Cliffs about rock-climbing.

## **4. Transportation and Forest Access (TFA)**

### **4.1. Transportation and Forest Access Desired Conditions (FW-TFA-DC) (Page 121)**

#### **4.1.1. Add the following Condition:**

"System road and trail infrastructure meets the increasing demand for forest access by local and visiting users."

*Discussion:* It is important to recognize that there is an increasing demand for recreation on the Carson, and while there may be some challenges to meeting that demand, we can all agree that we desire it be met.

### **4.2. Transportation and Forest Access Objectives (FW-TFA-O) (Page 122)**

#### **4.2.1. Modify Objective 1 to read:**

"Obliterate, naturalize, or convert to non-motorized recreational use at least 20 miles of unneeded roads

within the 10-year period following plan approval."

*Discussion:* Wording applies to Alternative 2 or Alternative 4.

Temporary roads such as fire / logging roads can serve as useful connectors and alternative routes for recreation. While they are not as desirable as purpose-built trails, they do have value. As the process for creating new trails can be a cumbersome roadblock, converting old roads into trails can help temporarily fill the increasing need for recreational trails.

#### **4.2.2. Modify Objective 3 to read:**

"Maintain all existing and future trails (including motorized) on a rotating basis, with at least 200-400 miles of non-motorized, and 30-45 miles of motorized trails maintained annually."

*Discussion:* As stated in the introduction, there are 600 miles of non-motorized, and 85 miles of motorized trails. All of these should be attended to at least every 3rd year, if not every other year. Also, it is important to distinguish between motorized and non-motorized, so that neither gets ignored / disproportionately attended to.

#### **4.2.3. Add the following Objective:**

"Create new sustainably-built trails as needed to meet the increasing demand for non-motorized transportation opportunities."

### **4.3. Transportation and Forest Access Standards (FW-TFA-S) (Page 122)**

#### **4.3.1. Modify Standard 3 to read:**

"Temporary roads that support ecosystem restoration activities, fuels management, or other short-term projects shall be decommissioned, or converted to non-motorized recreational trails upon project completion, to protect watershed condition, minimize wildlife disturbance, and prevent illegal motorized use."

### **4.4. Transportation and Forest Access Guidelines (FW-TFA-G) (Page 122)**

#### **4.4.1. Adopt Guideline 11 from Alternative 3 and modify to read:**

"Temporary roads that support ecosystem restoration activities, fuels management, or other short-term projects should be considered for conversion to system roads, motorized trails, or non-motorized trails."

#### **4.4.2. Add the following Guideline:**

"Changes to existing transportation infrastructure, including decommissioning of unauthorized roads or trails, are done in consultation with user groups and stakeholders who may be affected by the change."

*Discussion:* Multiple "unauthorized" trails exist on the Forest as a result of users self-filling a need that has apparently not been met. Rather than blanket decommissioning of these trails, we would like to see active engagement with user groups to seek solutions that will accommodate these needs, either through the creation of more sustainable trails, or through alternative solutions for maintaining these routes.

### **4.5. Management Approaches for Transportation and Forest Access (Page 123)**

#### **4.5.1. Add the following Approach:**

"Consider converting temporary roads and roads to be decommissioned into motorized or non-motorized recreational trails/routes where appropriate and feasible for expanding recreation access."

## 5. National Scenic, Historic, and Recreation Trails (NTRL)

### 5.1. Continental Divide National Scenic Trail (Page 148)

#### 5.1.1. Update the last sentence with correct length of completed trail.

*Discussion:* It is our understanding that aside from a few sections of re-route, most of the 100-mile corridor has been completed.

#### 5.1.2. Append the following:

"The CDNST on the Carson represents one of the few extended sections of single-track trail on this national system that does not cross Wilderness, making it a unique and sought-after recreational opportunity for bike-packers and long-distance mountain bikers, which is unavailable elsewhere."

*Discussion:* It is important to recognize the profoundly unique opportunity the CDNST on the Carson provides. Even before its completion, sections were being ridden by riders seeking solitude, exploration and challenge that the nearly continuous single-track affords.

### 5.2. South Boundary National Recreation Trail (Page 148)

#### 5.2.1. Modify the last paragraph:

"It is also one of the premiere mountain biking trails in the country, recently designated an IMBA Epic trail, a title that recognizes the handful of trails 'worth making travel plans' for. Mountain bikers come from many parts of the world to ride this trail, and the recreational use supports several local businesses including shuttles, guides, race events, as well as local shops and lodging."

*Discussion:* The love, recognition, and impact of the South Boundary Trail can not be overemphasized. It is consistently ranked the best trail in New Mexico, designated an "IMBA Epic Ride" and attracts visitors, nation- and world-wide throughout the summer.

## 6. Recommended Wilderness Management Area (RWMA)

*Discussion:* We strongly oppose the proposed designation of **Olguin** and **Canjilon Meadows Wilderness** areas as listed in alternatives 4 and 5. The newly completed Continental Divide National Scenic Trail (CDNST) runs through the middle of both of these areas, and recommending them as Wilderness would lead to and cause a significant loss to current recreational mountain biking on the Carson National Forest.

Additionally, we oppose the proposed recommendation of **Comanche Wilderness** Area (alternative 5) as this is currently utilized by mountain bikers as part of the Ghost Ranch alternate of the Continental Divide National Scenic Trail.

Finally, we are concerned that the proposed recommendation of the **Brazos Ridge Wilderness** Area (alternatives 4 and 5) currently includes 0.26 miles of the CDNST as it is currently aligned. We request that this boundary be redrawn to exclude the current layout of the CDNST so as to not disrupt current mountain biking use in this area.

The 100 miles of nearly continuous single-track on the CDNST is a unique, sought-after riding opportunity utilized frequently by both local and visiting mountain bikers. Vast amounts of time and money have been invested in this trail infrastructure, with mountain bikers being strong partners in the development and maintenance of the CDNST on the Carson. TMBA members have volunteered extensive time with the hope that the trail would remain a lasting resource for our recreational use. It would be a significant blow to the

recreation opportunities on the Carson to limit bike access on the CDNST.

Further, conversion of these areas into Recommended Wilderness would be incongruous with the Forest's recreation priorities as well as the Forest Service's mandate to consider and allow for historic uses on public lands wherever feasible. It is our understanding that the Washington Office of the USFS has provided informal guidance to avoid creating RWMAs in areas with existing mountain biking trails, as has been stated to IMBA staff in the Washington Office of the USFS in D.C. at the Chief's office by agency leadership that lead the management of Wilderness, WSA and RWA lands.

We are not opposed to all Recommended Wilderness areas throughout this process, only those that would result in loss of cherished bike access or a significant reduction of current mountain biking opportunities on the Carson National Forest. As an alternative, we would urge the Forest to consider using a bike-friendly "Backcountry Area" designation in order to protect the area as it is now while maintaining the bike access into future management. This "Backcountry Area" USFS designation ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd567830.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd567830.pdf)) has been developed elsewhere for the purpose of protecting an area's character while maintaining the diverse recreational opportunities currently enjoyed and we believe it would be appropriate to be applied here.

The Forest Plan should recognize that there are some areas of the Carson NF that have low development and wild character and yet are also critically valued for human powered recreation that includes mountain biking and therefore deserve customized management to retain and meet those needs. To manage these areas in a manner that can maintain the recreational access and character requires more flexible management than RWMAs offer. The management goals of areas like this should seek to maintain the status quo of access, wild character and low level of development of the area. This can be best served through a Backcountry Area Designation.

As a last resort, we would not necessarily be opposed to creating the above RWMAs if a non-RWMA bike travel corridor was created along the existing trails to allow for the continued use of mountain bikes between two adjacent Wilderness parcels but this option is less ideal than an alternative designation.

## **6.1. Recommended Wilderness Management Area Standards (MA-RWMA-S) (Page 158)**

### **6.1.1. Modify Standard 2 to read:**

"Mountain biking shall be the only form of mechanized recreation allowed in a recommended wilderness management area."

*Discussion:* Recommended wilderness is not required to be managed as Wilderness, and in fact other forests are allowing for the continued use of mountain bikes within RWMAs. For example, Coleville National Forest's updated management plan includes this language: "Recreational mountain bike use and the use of chainsaws for trail maintenance on existing National Forest System Trails are the only uses inconsistent with wilderness designation allowed in recommended wilderness."

Similarly, the Medicine Bow-Routt NF Revised Forest Plan allows mountain bike access to Rock Creek RWA, recognizing that, "The Rock Creek trail provides one of the only long distance mountain biking opportunities" in the area. The CDNST is one of the only long distance mountain biking opportunities on the Carson, and is unique and worth protecting as a premier mountain bike trail.

On the chance that the above Wilderness Management Areas are adopted, we request that users be allowed to continue mountain bike use and perform needed trail maintenance until such a time that those wilderness



areas are formally adopted by Congress as designated Wilderness.

## **6.2. Recommended Wilderness Management Area Guidelines (MA-RWMA-G) (Page 158)**

### **6.2.1. Modify Guideline 3 to read:**

"Motorized equipment or mechanized transport for management activities (e.g., chainsaws or wheelbarrows), and mechanized transport for recreation activities (e.g, mountain biking) should be allowed in recommended wilderness areas if they do not permanently degrade wilderness characteristics of the area."

## **7. Glossary**

### **7.1. Terms (Page 192)**

#### **7.1.1. Modify the definition of E-Bike to read:**

E-bike (electric bicycle). A bicycle with an integrated electric motor that can be used for propulsion, in addition to pedaling. An e-bike is not considered a mechanized bicycle, nor is it the same as a motorized vehicle. E-bikes will be managed separately and independently of those two distinct classes of vehicle.

*Discussion:* It is important to develop clear and distinct policies regarding the increased use of e-bikes on public lands.

While we support access to the national forest for a broad diversity of users, we find significant discrepancies in how federal agencies define and manage e-bikes. As the technology is new and rapidly changing, we are concerned that until land management agencies have clearly defined how to regulate these new tools of recreation, they should not be lumped into traditional definitions of "motorized" or "non-motorized" use.

It has been clearly established that human-powered bicycles are in no way the equivalent of motorcycles and ATVs in their impact on the trail, the environment, and other users. Currently, most e-bikes currently do not possess the torque, power, and speed of a typical motorized vehicle. At the same time, however, some can achieve speeds greater than human-powered bicycles, may allow users to obtain access to previously lesser-visited areas, and will likely result in new use patterns and may result in increased impact.

While the easiest management approach would be to place e-bikes into the motorized use category (as written in this plan) we feel this fails to recognize that there is a place for e-bikes on some trails, and that essentially banning them from all non-motorized trails flies counter to our shared goal of providing more opportunities for a diversity of people to enjoy our public lands. There may be trails that are appropriate for e-bikes and others that may not be. These access decisions can be managed on a case-by-case basis.

In short, we urge the Forest Service to assess new uses such as this, identify their unique traits and management needs, place them individually and separately into the spectrum of uses based on dominant traits, and manage them accordingly. Combining unique uses can and will likely have a detrimental impact on the end user.

## **8. Off-Highway Vehicle Management Area (OHVMA) (Description of Alternatives)**

*Discussion:* We support the establishment of an Off-Highway Vehicle Management area as described in **Alternative 3**. OHV use on non-motorized trails is a continuing management problem on the Forest, and by designating an area for their recreation coupled with user engagement and education, we hope this will

reduce the encroachment on non-motorized areas.

## **9. Appendix B. Proposed and Possible Actions (Page 231)**

Update appendix B to be consistent with the changes proposed above.

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TMBA and IMBA support the protection of public land for this and future generations. Mountain biking is a growing sport, compelling to all ages and abilities, especially with children and youth, and can bring economic benefits to rural communities, as such land management practices encourage this activity. We appreciate the work that you and your staff are putting into this Forest Plan Revision process, and wish to remain engaged in the process, as well as all other matters concerning mountain biking on the Carson National Forest.

Finally, we would appreciate the opportunity to sit down in person and discuss the above proposed changes and concerns in person in order to further clarify our position.

Thank you for your time and consideration,

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