



August 14, 2019

Hahns Peak-Bears Ears Ranger District  
Attn: Mad Rabbit Trails Project  
925 Weiss Drive  
Steamboat Springs, CO 80477

*Sent via email:* comments-rm-medicine- bow-routt-  
hahns-peak-bears-ears@fs.fed.us

Re: Mad Rabbit Trails Project

Dear Ms. Umphries,

Keep Routt Wild would like to submit a second set of comments regarding the preliminary proposed action for the Mad Rabbit Trails Project dated July 16, 2019. We are submitting these comments in light of new information and these comments are in addition to, not in place of, our initial comments dated August 9, 2019.

The new information is a need analysis and evaluation performed by IMBA (International Mountain Bicycling Association) in September 2017, titled IMBA Ride Center Report, Steamboat Bike Town Ride Center. The report is attached in its entirety. IMBA assesses a location's trail systems and services and gives a rating to the locality. Equally important, IMBA identifies the major unmet needs of a location, and calls out specific improvements to improve the rating. This report was generated for the local IMBA chapter, Routt County Riders, and shared with the Steamboat Springs 2A Committee, where it became public.

This is important to the Mad Rabbit Trails Project because it provides an independent and professionally generated assessment of needs from this particular user perspective, in this case mountain bikers. By itself, the professed needs of any one user group cannot determine developments in our US Forests. However, when the US Forest Service balances various tradeoffs in its evaluation, this report can be used as an independent analysis of need.

Steamboat Springs is designated as a Silver Level IMBA Ride Center in the report. This in itself is quite an achievement, and indicates the current set of trails and services in the area are very good. IMBA identified eight specific needs where Steamboat Springs could improve. We analyzed those needs against the proposed Mad Rabbit Trails, and generated a chart below showing where the proposed trails would meet the identified need. The column to the left contains a representative quote from the report, while the rightmost column is our assessment. The needs are listed in the order that they appeared in the report, and not by priority.

Mad Rabbit trails did not satisfy a single need identified by IMBA.

## KEY IMBA SUGGESTED IMPROVEMENT

## SOLVED BY MAD RABBIT?

1. "No lodging that caters specifically to bicyclists"	<b>No.</b>
2. "No Mountain Bike shuttle service"	<b>No.</b>
3. "Emerald Mountain Trails can feel repetitive... Make an effort to augment and enhance some of the older trails..."	<b>No.</b>
4. "Steamboat Resort Bike Park trails are too long for beginners"	<b>No.</b>
5. "Beginner Trails around town push riders comfort level"	<b>No.</b>
6. "Very few truly Beginner to Intermediate Rides... Develop new beginner trails close to town and optimize loop opportunities"	<b>No.</b>
7. "Lower NPR Green is not as easy as it should be"	<b>No.</b>
8. "The Continental Divide Trail doesn't connect to town with singletrack via Buffalo Pass"	<b>No.</b>

The IMBA report clearly identifies the major trail needs as more beginner trails close to town. It also identifies key missing services in the Steamboat Springs area. While Need #2 identifies the need for a shuttle service, and the US Forest Service has proposed authorizing a shuttle service through a special use permit, no trails need to be constructed to meet this need. Need #8 is the only identified need in the entire list outside of town. We would note that, in fact, the CDT does connect to town through the ski area, and is accessible from both Dumont Lake and Buffalo Pass.

This report clearly shows some unmet needs for the mountain biking community in Steamboat Springs. But it also shows that the preponderance of needs cannot be met by Mad Rabbit, or even a modified Mad Rabbit. These must be met elsewhere. In all eight cases, the need may be met without any excursion into Colorado Roadless Areas. We ask the US Forest Service to take the IMBA report into account when balancing need with impact.

Yours sincerely,  
Keep Routt Wild

Larry Desjardin  
President of the Board