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Re: Inyo National Forest
Assessment Report

August, 30, 2013

Dear Ms. Joyce,

We are writing on behalf of the International Mountain Bicycling Association (IMBA). IMBA is a non-profit educational association, whose mission is to create, enhance and preserve great trail experiences for mountain bikers worldwide. Since 1988, IMBA has been bringing out the best in mountain biking by encouraging low-impact riding, volunteer trail work, participation and cooperation among different trail user groups, grassroots advocacy and innovative trail management solutions. IMBA's worldwide network includes 40,000 individual members, more than 450 bicycle clubs, more than 175 corporate partners and about 200 bicycle retailers. IMBA's members live in all 50 States, most Canadian provinces and about 30 other

countries. We represent thousands of mountain bikers who ride on, or would like to ride on the public lands that comprise the Inyo National Forest.

We are writing to comment on the Inyo National Forest Assessment Report, which is currently being prepared by your office. We have studied the draft language, and our comments will conform to your intent to provide appropriate access to users.

First, we want to express our appreciation for inclusion in this plan of substantial elements that deal with recreation, which is a welcome addition to the Forest Service planning efforts. In that regard, we are pleased to note that mountain bikes are featured in different chapters of the plan as users of the spectacular lands of the Inyo Forest.

Broadly speaking, IMBA's primary concern is that there are far too few opportunities for mountain bikers to enjoy the incredible lands that comprise the Inyo National Forest, and those that do exist are frequently unknown or too isolated for appropriate use. Mountain bikers need significant trail systems, with stacked loop trails and connections that can provide long rides. This is abundantly possible in the Inyo Forest, with a few relatively simple approaches. The Inyo Forest is large and wonderful, and can easily provide the opportunities needed. Some of these ideas can be seen in discussing various sections of the draft Assessment.

Chapter 9 discusses current uses of the Forest, basing some conclusions on Forest Service National Visitor Monitoring (NVUM) done in 2006 and 2011. These "surveys" indicated that mountain biking was not one of the top 5, or even one of the top 12 uses of the forest. For a variety of reasons, we suggest that it is not appropriate to rely heavily upon these conclusions. As has been mentioned by many critics, the NVUM process is flawed in many respects. In this case, the lack of existing or known mountain bike opportunities skews the result of the surveys. If users are not at the place surveys are being taken, their voices do not count, giving the false impression that there is no demand. On the contrary, mountain bikers want to ride in the Inyo NF. They just don't know where to go.

More generally speaking, certain users, such as mountain bikers, rock climbers, whitewater paddlers and backcountry skiers all seek out high quality experiences that can only be found in specific locations. The site selection processes must be weighted to ensure that these locations are included in samples, and prevent under-representation of activities. Additionally, the days selected for sampling are often random, and do not reflect the variables that make any particular day optimal for a given use. Seasonal issues are primary examples of this. For these and similar reasons, the Forest Service practice of NVUM random sampling is unlikely to represent actual recreation use, much less latent demand.

The Recreation section contained in Chapter 9, discusses desires for additional recreational activities. We are pleased to see the mention of "snow biking", and urge that it be made available on Inyo NF snow trails. We understand there is currently a rule in that forest prohibiting wheeled vehicles on groomed snow trails, and that it

grew out of impact that would be caused by motorized vehicles. That prohibition was doubtless instituted before the advent of mountain bikes, and is inappropriate when applied to them. There are many other forests that have permitted "snow biking" with great success. We urge you to consider these examples, and remove that prohibition.

We urge that the Recreation chapter be supplemented to reflect the strong desire for additional mountain biking opportunities throughout the Inyo NF. It is astonishing that, given the huge natural areas that comprise this forest, there is essentially only one trail, the Lower Rock Creek Trail, that is given status as a "destination" public trail for mountain bikers. Of course this document is not about individual trails, but this example illustrates the problem. That trail is great, but it is very short, and parts are too technical for beginning and intermediate riders. There are many other opportunities that need to be created and/or publicized. For example, there are many public trails around Mammoth that are underutilized, or un-connected with one another. This is one of the most important areas where the Inyo NF could make a big contribution. There are also numerous single and double track trails between Lee Vining and Mammoth that need to be examined for better mountain bike use. In this regard, please note that many trails are largely composed of sand, which is inappropriate for normal mountain bikes, although the new "fat bikes" or "snow bikes" may work in those conditions. We suggest that those sandy areas be examined to ascertain if some of the soft conditions might be caused by the type of use on the trail, rather than by the natural conditions. If use is the cause, modifications might be considered to harden the tread.

We submit to you that these are only a couple of examples among hundreds of places where mountain biking opportunities should be provided.

The need for an increased commitment to creating more mountain bike opportunities is that much greater because of the large percentage of lands in the Inyo NF that are Wilderness, which prohibits bike use. Figures within the assessment seem to vary, but it seems that about half of the Forest's lands are in Wilderness. It is critical that the remaining lands be examined for additional mountain bike use.

It is common knowledge, and frequently reflected in the Assessment, that the Inyo NF does not have enough funding to create and maintain its system of roads and trails. We are pleased to see several groups mentioned as being instrumental in volunteer work projects, including Friends of Inyo, Mammoth Lakes Trails and Public Access and the Backcountry Horsemen. We urge you to also include mountain bike groups, which are known for providing huge numbers of volunteers for trail projects. We know that mountain bikers have made significant contributions in your area, frequently working with the groups mentioned. We ask that you also mention the International Mountain Bicycling Association (IMBA) in this regard. IMBA has significant trail building and maintenance resources, which we will make available in the Inyo NF. We are also facilitating the establishment of local IMBA groups that will be available.

There are strong relationships between the Assessment and the Forest Motorized Travel Management EIS that the Inyo NF has been working on for some time. As a result of that effort, numerous "roads" have been, or are being, removed from the system of motorized routes. The question will be in each case, what to do with them? While it is clear that some will be returned to nature, it is equally clear that a great number of them can be retained for other, non-motorized use. We strongly urge that the Inyo NF continue examining these trails, and make serious commitments to transform such trails into single track trails for mountain bikes and other muscle-powered uses. We hope that language to that effect can be included in Chapters 9 and 11 of the Assessment.

Thank you for considering our remarks. We are very pleased to be a part of the "collaborative" approach you are utilizing in this planning effort, and we look forward to increased participation as it proceeds.

Please contact us if you have questions, or if we can be of further assistance

Very Truly Yours,

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