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Re: Sierra National Forest
Assessment Report

September 15, 2013

To Whom It May Concern:

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 Sierra National Forest.

We are writing to comment on the Draft Sierra National Forest Assessment Report, which is currently being prepared by your office. We have studied the draft language, spoken with Sierra Forest staff members, and are communicating with mountain bikers in your region. We hope 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. We also want to comment the Forest Service for its initiative to engage in a collaborative process in developing this plan.

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 Sierra Forest, with a few relatively simple approaches. The Sierra 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. As will be seen, we will repeatedly suggest that the Sierra Forest set forth its determination to develop new trails for mountain bikers, and equally important, to highlight those that exist now.

At the outset, we suggest that you take every opportunity to mention mountain bikers as legitimate and significant users of the Forest. There are several places in the Draft Assessment where other users are mentioned, but mountain bikers are not. To remedy this, we suggest that towards the beginning of Chapter 9, dealing with Recreation, you include a paragraph that celebrates all of the users of the Forest, including mountain bikes. That paragraph could make it clear that the Sierra Forest is a destination that welcomes and will provide opportunities for these users. Naturally, mountain bikers should be included.

In addition to this, we suggest that care be taken to mention mountain bikes whenever other uses are discussed or listed. We are pleased that the Assessment states at the outset that the Forest provides "tremendous opportunities" mountain biking, along with other uses, and urge that it be included in subsequent lists and discussions. For example, page 169, in the Recreation Chapter, includes a table which lists all uses; 4WD, ATV, Cross Country ski, Hiking, Motorcycle, Pack and Stock, and Snowmobiles. But it fails to even mention mountain biking. Since mountain bikes can presumably use almost all of the trails that could be used by horses and hikers, we suggest their inclusion in the table would be significant.

When discussing the need for the Assessment to increase its focus on mountain biking, it must consider the perceived number of mountain bikers who currently use the forest, as well as the number of "latent" users, who would use the Forest if opportunities were provided, or if existing opportunities were known.

Chapter 9 discusses current uses of the Forest, basing some conclusions on Forest Service National Visitor Monitoring (NVUM) done in 2007. This "survey" indicated that mountain biking was not one of the top 5 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 Sierra 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.

With these things in mind, we urge you to acknowledge the existing and latent demand for mountain biking opportunities, and in essence, market such opportunities as part of your efforts to bring users to the Sierra Forest.

In this vein, and as mentioned at the outset, we again urge the Sierra Forest to make clear its commitment to create trail systems that can be used by mountain bikers, and highlight those that already exist. This effort must include emphasis on connecting trails and trail systems that exist now. 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 Sierra NF that are Wilderness, which prohibits bike use. It is critical that the remaining lands be examined for additional mountain bike use.

In creating these trail systems, we suggest that the Assessment reflect a deliberate effort to plan how trail systems interact with the landscape, and how uses will be managed to provide specific trail experiences. As indicated in our recent testimony to the House Natural Resources Committee, managing trails based upon desired experiences, sustainable construction and maintenance, and suitability for the desired conditions of the area, rather than simply by mode of travel, would allow agencies to actually manage a trail system. Trails must be constructed or converted, to be sustainable recreation trails, rather than temporary extraction roads, firebreaks, hunting routes, or game trails repurposed as public access routes. A purposefully designed trail system is light on the land, showcases the landscape, steers visitors away from sensitive areas, and provides a broad range of experiences.

The Recreations section contained in Chapter 9 provides a great opportunity to discuss additional recreational activities. We suggest that it specifically mention "snow biking", which involves use of "fat bikes" on snow trails. This is a relatively new activity that is prevalent in numerous areas of the country, and provides great opportunities for bicyclists to enjoy trails in winter.

It is common knowledge, and reflected in the Assessment, that the Sierra NF does not have enough funding to properly create and maintain its system of roads and trails. We believe that a strong volunteer program, which includes many forms of partnerships between the agency and NGOs and non profit groups would go a long way to solving this problem. We are pleased to note that partnerships and volunteer programs are mentioned in the Draft Assessment, as exemplified on page 157. Clearly, these efforts get diverse groups involved and help the Forest Service carry out its mission. They involve our citizens, create in them a sense of ownership, and help turn them into stewards of our public lands. Importantly, we agree that these activities can go a long way towards embracing youth, low income groups and minority populations into our open spaces.

For these reasons, we strongly urge that you support a vastly increased volunteer program, and reflect that in the Assessment. In many agencies, the current practice is to treat volunteer programs as a burden on the agency. Often it is said that excessive resources are required to train and manage volunteers, and that too much staff time is involved. We suggest that this approach is flawed. Instead, volunteer programs and partnerships should be viewed as integral parts of the structure of the forest. They must be understood as "systems", rather than as add-ons. Keep in mind that, while public agencies and private groups can each do a great deal, together, their synergy enables them to do much more than either could do alone. In this case, the whole is indeed, greater than the sum of its parts. With these ideas in mind, we urge that the Assessment deal in detail with the need to create public-private partnerships, and to properly maintain them. As once stated by a keynote speaker at the annual California Trails and Greenways Conference, land managing agencies owe a "duty" to their customers to provide volunteer opportunities, similar to the duty to provide recreation. In these regards, mountain bikers have proven themselves to be huge supporters of volunteer efforts, and will do so in the Sierra National Forest.

There are strong relationships between the Assessment and the Forest Motorized Travel Management EIS that the Sierra 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 Sierra 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.

Finally, we would like to make a few comments about the structure of the Draft Assessment. We feel compelled to remark that, in some places, the document is difficult to read. We suggest that it be reviewed as a whole, and that changes be made to make it flow better for the reader. In that regard, we also suggest that there be more material included which can outline actions that may be taken. There is quite a bit of information dealing with description of current conditions, but perhaps too little that suggests what to do in the future.

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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