



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

November 16, 2018

Bitterroot Travel Management Plan, Project 21183
Objection Reviewing Officer
USDA Forest Service
26 Fort Missoula Road
Missoula, MT 59804
electronically mailed to: appeals-northern-regional-office@fs.fed.us

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RE: Objection to the Closure of the Sapphire and Blue Joint Wilderness Study Areas by the Bitterroot Travel Management Plan

Dear Objection Reviewing Officer,

The International Mountain Bicycling Association (IMBA), as lead objector and on behalf of our national membership. IMBA, hereby objects to the Travel Management Plan for the Bitterroot National Forest (Forest). Specifically, IMBA objects to the complete closure of the Sapphire and Blue Joint Wilderness Study Areas (WSAs) to mountain biking. Forest Supervisor Julie K. King instituted this closure in her Record of Decision (ROD) dated May 2016.

While this process has been rightfully opened to the public, IMBA has standing to object under 36 CFR 218.5 by virtue of our long history of engagement with this planning process. IMBA commented on the 2009 Draft Environmental Impact Statement (Draft EIS) and objected to the 2015 Draft ROD. IMBA's current objection is directly linked to our previous comments and objection, which also opposed the closure of these WSAs and other portions of the Forest to mountain biking. IMBA thanks the Forest for its re-consideration of these issues and looks forward to working with the Forest Service to find a resolution.

I. Background

The current objection period is the result of a court order. Mountain bike advocates joined others in suing the Forest in *Bitterroot Ridge Runners Snowmobile Club et al. v. United*

*States Forest Service et al.*¹ The District Court ordered the Forest to open an objection period on the specific issue of the Forest’s belated decision to close the Sapphire and Blue Joint WSAs to mountain biking.

The court reviewed a number of claims regarding the Forest’s closure of WSAs and Recommended Wilderness Areas (RWAs) to motorized and mechanized (i.e., mountain bike) use. Most relevant to this objection was the claim that the Forest violated the National Environmental Policy Act (NEPA) and the Montana Wilderness Study Act (MWSA) when it closed the Sapphire and Blue Joint WSAs to mountain biking. The court considered whether this decision was “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.”²

The court concluded the decision was arbitrary, capricious, and an abuse of discretion. The court credited the data the Forest relied upon, deferred to the Forest’s justifications (based on social impacts like “the feeling of being in an undeveloped setting” and “impacts of noise”), and did not order a supplemental EIS.³ Even so, because the Forest did not announce the complete closure of these WSAs to mountain biking until the ROD, the court held “the Forest Service abused its discretion by including the extra miles of WSA bicycle use closure without providing public comment.”⁴ The court concluded by ordering the current objection period, with specific instructions that the Forest consider the objections and modify its decisions as necessary.

Though IMBA may disagree with the court’s other conclusions and the parties to the case may appeal, IMBA welcomes this opportunity to provide comments. To effectuate the court’s order, this objection period must be more than perfunctory. The court did not open this objection period as a mere box-checking exercise. The court clearly intended that the Forest take seriously these objections and diligently reconsider the decision to close these WSAs.

II. Issues

IMBA objects to the closure of the WSAs for the following reasons. The closure is inconsistent with law, policy, and data, and it must be reversed. Rather than a complete closure, the Forest should monitor for any demonstrable impacts by mountain biking on Wilderness character by establishing a baseline of condition and character and incrementally adjusting management through adaptive measures accordingly.

A. The Forest Impermissibly Considered the “Constituency” for Wilderness, Rather Than Impacts to Wilderness Character.

¹ No. CV 16-158-M-DLC, 2018 WL 3201803 (D. Mont. June 29, 2018).

² *Id.* at *2 (citing Administrative Procedure Act, 5 U.S.C. § 706(2)(A)); *see also* Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983).

³ *Id.* at *5, *10.

⁴ *Id.* at *11.

To justify the complete closure of these WSAs, the Forest relied upon the “social” impacts of mountain biking. While social impacts on wilderness character are a valid consideration, the Forest relied in particular upon an invalid consideration: the political constituency for Wilderness. When an agency bases its decision on invalid considerations, it must be reversed: “Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider”⁵

The MWSA directs the Forest to maintain a WSA’s wilderness character as it existed in 1977, as well as the WSA’s potential for designation as Wilderness by Congress.⁶ The Forest may consider the social impacts of motorized and mechanized use, particularly to preserve opportunities for solitude.⁷ In doing so, the Forest need not “replicate 1977 conditions precisely.”⁸ As stated in the 2016 Final EIS, mountain bikes may “be allowed on trails that had established motor-bike use in 1977” or “on non-motorized trails as long as the aggregate amount of mountain bike and motorcycle use” does not reduce wilderness character or the potential for designation as Wilderness.⁹ The phrase “potential for designation” is a term of art referring to the retention of its Wilderness character that is necessary for it to qualify for Wilderness designation. The term “potential” is not a political calculus rather it’s a qualifying physical condition that can be achieved while allowing continued bike access. This symbiotic coexistence of bike and wilderness character has and continues to occur in locales across the country within units of the Forest Service that have been identified as having Wilderness character and has occurred in the Bitterroot NF WSAs before the trail closures were implemented.

Nowhere in the MWSA or the case law is the Forest directed to consider the political ramifications of its management. The very structure of the Wilderness Act, where only the elected members of Congress may designate Wilderness, implies that political considerations must be left to Congress.¹⁰ Indeed, the Forest Service itself is commonly tasked with testifying for or against Wilderness designations. Notably, in 1987, the Forest Service did not recommend designating the Sapphire WSA or parts of the Blue Joint WSA as Wilderness, citing the “option[s] for mechanized recreation” in each WSA.¹¹

Despite the law and the Forest’s own prior recommendations, the Forest considered the constituency for Wilderness in closing these WSAs. The ROD states, “allowing uses that do not conform to wilderness character creates a constituency that will have a strong

⁵ *Motor Vehicle Mfrs. Ass’n of U.S., Inc.*, 463 U.S. at 43.

⁶ 91 Stat. 1243 § 3(a) (1977).

⁷ *Montana Wilderness Ass’n v. McAllister*, 666 F.3d 549, 556 (9th Cir.), *aff’d*, 460 F. App’x 667 (9th Cir. 2011).

⁸ *Id.* at 559.

⁹ Bitterroot National Forest Travel Management Planning Project Final EIS, 3.2-26 (2016).

¹⁰ *See* 16 U.S.C. §1131(a).

¹¹ Bitterroot National Forest Plan, pp. 21–22 (1987).

propensity to oppose recommendation and any subsequent designation legislation.”¹² It is not the Forest’s job to consider the constituency for Wilderness. Nor is it the Forest’s job to create an uncomplicated “operating environment” wherein Congress can designate Wilderness “unencumbered” by the views of passionate mountain bike advocates and others who enjoy these landscapes.¹³ Congress did not direct the Forest to consider political constituencies, but reserved the politics of Wilderness designations to itself. Accordingly, the Forest’s consideration of political constituencies is arbitrary and capricious, and the Forest cannot justify its decision to completely close these WSAs.

Moreover, even if political constituencies were a valid consideration, the Forest reached the wrong conclusion. Mountain bike advocates can and do support Wilderness designations, as well as Wilderness Study Areas and Recommended Wilderness becoming Congressionally designated Wilderness. Mountain bike advocates have supported successful Wilderness designations in recent years in Montana,¹⁴ Colorado,¹⁵ and New Mexico for example.¹⁶ All mountain bike advocates do not oppose all Wilderness designations any more than all hiking and equestrian advocates support all Wilderness designations. The Forest has no grounds to consider these positions when making use-allocation decisions, and certainly may not ban a user group because of that group’s perceived political position, especially when that perceived position is wrong.

B. The Data Do Not Show Impacts to Wilderness Character and Do Not Justify a Complete Closure.

While the Forest was right to consider the social impacts of mountain biking, the social impacts the Forest relied upon in closing these WSAs are not borne out by the data, and, in any case, do not require a complete closure to mountain biking. Just like an agency decision supported by invalid considerations, an agency decision based on invalid data must be reversed: “an agency rule would be arbitrary and capricious if the agency . . . offered an explanation for its decision that runs counter to the evidence before the agency”¹⁷

The relevant considerations under the MWSA are the wilderness character of these WSAs, especially opportunities for solitude, in 1977 and today. Because the Forest admits that mountain biking does not at all “scar” the landscape, the Forest must point to

¹² Bitterroot National Forest Travel Management Planning Project Record of Decision, p. 26 (2016) [hereinafter ROD]. Though this language is in a section addressing RWAs, both WSAs and RWAs are interim designations pending Congressional approval, so the same reasoning applies.

¹³ *Id.*

¹⁴ <https://www.imba.com/press-release/rocky-mountain-front-heritage-act-gains-imbas-support>

¹⁵

<https://www.imba.com/press-release/trails-2000-and-imba-support-hermosa-creek-watershed-protection-act-colorado>

¹⁶

<https://www.imba.com/press-release/imba-supports-reintroduced-columbine-hondo-wilderness-act-new-mexico>

¹⁷ *Motor Vehicle Mfrs. Ass’n of U.S., Inc.*, 463 U.S. at 43.

social rather than physical impacts to justify the closure.¹⁸ The Forest attempts to show an increase in mountain biking significant to justify a complete closure. However, the data showing increased use is equivocal at best and does not show any impacts to wilderness character.

The ROD includes an extensive discussion of the inadequacies of the available data. The Forest could not determine use levels in 1977 “with any reasonable degree of confidence” and could only determine that mechanized use had increased from “non-existent” to a “common activity.”¹⁹ While the District Court found the Forest did “the best it could with the data it had,”²⁰ it is unlikely these conclusions reflect actual use levels in the WSAs.

For the limited conclusions it could draw, the Forest relied upon two studies by economist Keith D. Stockmann.²¹ These reports include precious little about changes in mountain bike use in the WSAs. The authors could only say “we don’t think any mountain bike use occurred in 1977, but we suspect that it has grown . . .” in keeping with statewide trends.²² The problem with this conclusion—beyond its obvious equivocation—is the assumption that Ravalli County follows statewide trends. Hamilton is smaller and more rural than other towns like Missoula, which drive statewide mountain bike participation. The trailheads for these WSAs are a two-hour drive from Missoula, and still an hour or more from Hamilton. The trails themselves are generally challenging, further limiting use. According to our local sources who visit the two areas 69 times over over the course of the last 20 years to hike or bike, the amount of use of these WSAs in recent years by bicyclists has remained at a low level and he encounters with other uses has been all but non-existent. However, an exception to this was the Chain of Lakes and the section of 313 trail from Chain of Lakes to Frog Pond Basin, where there was a high likelihood of encountering motorized user groups prior to travel restrictions that have been implemented for motorized users in the WSAs.

Below in [Table 1.] we include evidence and likely the best and longest user-derived monitoring available of use of the two WSAs collected and carefully documented over the course of the last 20 years by Mr. Jeff Kern, a local Bitterroot Valley resident and mountain biking and hiking enthusiast.

¹⁸ ROD p. 26.

¹⁹ *Id.* at p. 25.

²⁰ *Bitterroot Ridge Runners Snowmobile Club et al.*, at *6.

²¹ https://www.fs.usda.gov/nfs/11558/www/nepa/39018_FSPLT3_4383339.pdf;
https://www.fs.usda.gov/nfs/11558/www/nepa/39018_FSPLT3_4383340.pdf

²² *Id.* at p. 18.

[Table 1.]

Trail	Number of visits	Other users encountered	Comments
<i>Sapphire WSA</i>			
77 – Railroad Creek	18 (9 bike, 9 hiking)	0	Much of the trail passes through 2007 burn area - Most hiking trips were with chainsaw
156 – Weasel Creek	25 (20 bike, 5 hiking)	0	Much of the trail passes through 2005 burn area - Most hiking trips were with chainsaw
503 – Skalkaho Creek/Jerry Lake	8 (5 bike, 4 hiking)	0	Lots of clearing with handsaw
313 – Bitterroot/Rock Creek Divide – segments from Skalkaho Pass to Jerry Lake	6 (4 bike, 2 hiking)	0	Majority of trail passes through burn areas. Most trips included lots of clearing with either chainsaws or handsaws. Portions of this trail have been clogged with downfall for years.
87 – Skalkaho-Sleeping Child Divide	1 (bike)	0	Remote (15 miles on forest road to get to trailhead)
102 – Mosquito Meadows	2 (1 bike, 1 hike)	0	Remote (20 miles on forest road to get to trailhead)
39 – Chain of Lakes	2 (bike)	2 motorcyclists	This trail has had a lot of motorized use: loose/washed out/unsustainable tread
313 –	1 (bike)	4 ATVs	This segment has had a lot

[Table 1.] (continued)

Bitterroot/Rock Creek Divide – segment from Chain of Lakes trail to Sign Creek trail		(near Frog Pond Basin)	of motorized use: loose/washed out/ unsustainable tread
168 – Moose Creek	1 (hike)	0	-
40 – Sign Creek	5 (bike)	1 hiker	-
<i>Blue Joint WSA</i>			
106 – Razorback Ridge	5 (bike)	0	Included 2018 trail clearing project: 10 miles cleared with 4 chainsaws
137 – Jack the Ripper	2 (bike)	0	
138 – Chicken Creek	1 (bike)	0	All of trail is through burn area – rode this after FS cleared in 2015 – much appreciated, but trail is again clogged with downfall
139 – Deer Creek	2 (bike)	0	This trail is a major undertaking – lots of downfall and much of trail is on steep sidehill and needs to be recut into the hill. We did a lot of clearing with handsaws on both trips.
183 – Bare Cone	4 (3 bike, 1 hiking)	0	Cleared with handsaws
223 – Little Blue Joint	2 (bike)	0	-
614 – Blue Joint	5 (bike)	0	Cleared with handsaws
627 – Castle Rock	4 (3 bike, 1 hiking)	0	Cleared with handsaws

This impressive documentation by Mr. Kern demonstrates that the amount of use is low enough that the experience of other trail users is unlikely to be impacted by the presence of mountain bikers. Increased mountain bike use in the Bitterroot WSAs can be considered so small as to not make a qualitative difference on opportunities for solitude in these areas. Thus, even the equivocal conclusions of the Stockmann reports are questionable.

But the unremarkable conclusion that mountain bike use increased from nothing to something over this time period still does not get to the real question: what permanent impact does mountain biking have on current wilderness character, especially

opportunities for solitude? The Stockmann reports include no discussion of changes in wilderness character, opportunities for solitude, or conflicts between mountain bike users and others. Nor does the ROD.

Additionally, neither the Stockmann reports nor the Bitterroot TMP or ROD explores whether it is possible that continued mountain biking use could actually have a positive effect on wilderness character or the long term quality of the area. Fact is, a definitive answer to either question (negative impact or positive impact) has not been determined or thoroughly explored making the current trail closure decision that we object to speculative, arbitrary, and capricious and thus a violation of NEPA.

What we do know is that local mountain bikers have been great stewards to the trails in the WSAs in years past and selfishly even in the brief period in the summer of 2018 when the trails were reopened to bikes where within days the local mountain bike organization and Chapter of IMBA–Bitterroot Backcountry Cyclist–organized work days to clear trails of deadfall. Typically, in a given year when trails were open to bikes local mountain bikers would be authorized by the USFS to work to clear a trail with hand saws and/or chainsaws. After the trails had been closed for three years since the 2015 ROD, it appears that no entity had cleared these WSA trails since the last time bike stewards had cleared them before the closures were implemented. Bike stewards invest this time and energy just to be able to then ride it continuously once or twice that year without encountering downfall. Their stewardship efforts have benefitted all other trail users and the USFS, as the cleared trails have enhanced the ability of others to enjoy these special places and this has helped the Forest check off trails that have been cleared by volunteer efforts saving both time and money and greater expenses later if and when trails degrade or trail braiding occurs as use deviates around deadfall. The Forest has had a limited and apparently dwindling budget for trail maintenance, and has therefore been relying to an ever greater extent on volunteers/local user groups to maintain the trails. Therefore, given the relatively low level of mountain biking occurring in the WSAs, and arguably the greater positive impact that bicyclist presence has on the ability of others to access and enjoy the WSAs (thereby collectively enhancing wilderness character), it would be prudent and practical for the Forest to recognize this value, document it, and continue to allow mountain bikers to have access to the trails in the Bitterroot WSAs.

While IMBA does not deny that mountain biking may momentarily impact the experiences of other users just as the passing of an equestrian or pack mule train would or the sound of gunfire during hunting season, IMBA does deny that these impacts are substantial or persistent enough to justify a complete closure or that they have an any impact (temporary or permanent) on the wilderness character. Backcountry mountain biking, like that at issue here, is quiet, clean, and frequently includes hiking. With the difficult terrain, remote trailheads, and limited nearby population, mountain biking use in these WSAs is hardly distinguishable from hiking or horseback riding and, in any case, is self-limiting.

More importantly, any perceived social impacts on wilderness character from mountain biking would vanish and be completely eliminated if these WSAs were designated as Wilderness and mountain biking were prohibited. The minimal, fleeting social impacts of mountain biking cannot justify a complete closure in the interim time before Congress designates or releases these WSAs. Subjective social impacts do not leave a single mark on the land; the land remains just as suitable for Wilderness as it always has been. As their name implies, WSAs are interim designations, in “uncertain limbo” pending Congressional designation.²³ Mountain biking should be permitted, because it has nearly no physical impacts, as the Forest admits, minimal social impacts that disappear upon designation, and no impact on the ultimate disposition of these areas. The MWSA requires that the Forest Service manage to maintain the integrity of Wilderness. Maintaining the Wilderness integrity in order to retain or exceed the Wilderness character as it existed in 1977 does not and should not preclude continued access to existing mountain bike trails by cyclists that have no lasting ecological or social impact on the long term character and therefore do not change the WSAs future Wilderness integrity. If the wild character still exists having had mountain bikes riding there as recent as 2015, that indicates that character can be maintained concurrently with bike access so long as the access is carefully managed employing the full spectrum of adaptive management steps provided in the handbook and adapted to the WSA in question.

If the Forest is truly concerned about the opportunities for solitude in these WSAs, it should limit people, not activities. After all, the MWSA is more concerned with the “volume of use” than the type of use.²⁴ As described in the *Montana Wilderness Association* case, “if a hypothetical hiker traversing a certain route in 1977 would have encountered one noisy motorcycle, but today would encounter 20” then that WSA’s wilderness character has been reduced.²⁵ The issue is not whether or not motorcycles should be allowed, but how many. Under the logic of that case, one noisy motorcycle should still be permitted today. Given that mountain biking is not noisy, the Forest does not have to match 1977 conditions precisely, and mountain biking may be permitted on what were motorized trails in 1977, there is simply no justification for a complete closure. In fact, the court in that case concluded “there may be other reasonable management responses” besides limiting the types of users.²⁶ As discussed below, the Forest Service Handbook includes an established policy favoring reasonable management responses before complete closures.

C. The Complete Closure of these WSAs is Contrary to Analogous Directives.

By jumping to a complete closure of these WSAs to mountain biking, the Forest skipped intermediate steps that are required for the management of RWAs. The Forest Service Handbook lays out a clear progression of management options for RWAs. Though these

²³ Objection Response, p. 10 (July 15, 2015), https://www.fs.usda.gov/nfs/11558/www/nepa/39018_FSPLT3_2549003.pdf

²⁴ *Montana Wilderness Ass’n*, 666 F.3d at 553.

²⁵ *Id.* at 558.

²⁶ *Id.* at 559.

directives are applicable to RWAs and not WSAs, both designations are interim designations, subject to similar requirements to maintain wilderness character and ultimate disposition by Congress. Similar management approaches should apply to both and the Forest has the discretion to utilize these options and employ them.

The Handbook requires that a Forest “enhance” the characteristics justifying designation as Wilderness; “continue existing uses;” “alter existing uses;” or, presumably when the prior approaches have failed, “eliminate existing uses.”²⁷ Numbered 1 through 4, these directives present a hierarchy of management options from least to most disruptive to current uses. This adaptive management approach allows a Forest to tailor its management as conditions change over time, all while preserving wilderness character. Notably, this approach is endorsed and recommended in recent reports from the House and Senate Appropriations Committees.²⁸ The Committees also “encourage the Service to reconsider historic uses that have been prevented in areas recommended as wilderness that otherwise can be managed utilizing the adaptive management steps provided in the handbook...” Similar language was included in the 2018 Senate Interior Appropriations report in 2017.²⁹

Despite this analogous guidance, the Forest instituted a complete closure of these WSAs, rather than any adaptive management measures. The Forest should have continued or altered existing mountain bike use before eliminating it entirely. Especially with the lack of relevant data, the Forest should have monitored conditions and ramped up management options as necessary. As an example, the Coleville National Forest is taking just such an approach, allowing mountain biking in RWAs, while annually monitoring 20% of trails for their impacts on wilderness character.³⁰

D. The Impact of the Complete Closure is Three Times Greater than Estimated.

One of the justifications for the complete closure was that these WSAs included a small percentage of the total opportunities for mountain biking in the Bitterroot. However, these calculations were wrong. As a result, the impact of the closure is actually three times greater than stated.

In *Bitterroot Ridge Runners Snowmobile Club et al. v. United States Forest Service et al.*, the court declined to order a supplemental EIS because the Forest only “closed 110 miles

²⁷ Forest Service Handbook 1909.12, Ch. 70.1 (2015).

²⁸ House Report, Department of Interior, Environment, and Related Agencies Appropriations Bill, 2019, p. 69–70 (2018), https://appropriations.house.gov/uploadedfiles/interior_report.pdf; Senate Report, p. 83 (2018), <https://www.appropriations.senate.gov/imo/media/doc/FY2019%20Interior%20Environment%20Appropriations%20Act,%20Report%20115-276.pdf>.

²⁹ Senate Report Page 82 (2017)

<https://www.appropriations.senate.gov/imo/media/doc/FY2018-INT-CHAIRMEN-MARK-EXPLANATORY-STM.PDF>

³⁰ Coleville Forest Plan, p. 168 (Sept. 2018),

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd594831.pdf.

of trails in WSAs from bicycle use, which is 9% of the 1,222 miles available for mechanical transport on the Bitterroot.”³¹ This calculation uses the incorrect numerator and denominator. By IMBA’s calculations, using the Forest’s own numbers, (*see* Exhibit 1) there are a total 162 miles of trails in these WSAs, while there are only 554 total miles of trails open to mountain biking. Even allowing for the inevitable inconsistencies in these calculations, the difference between the court’s estimate and the reality is striking. Far from a 9% decrease, the complete closure of these WSAs is actually three times greater: a 29% decrease in mountain bike opportunities.

Moreover, these calculations assume that all trail miles are created equal. From a mountain biking perspective this is not true. Some trails and sections of trails are much more valuable than others, due to differences like scenery, connectivity, and trail design. Therefore, as to certain high-value trails in these WSAs, the percentage impact is not 9% or even 29% but 100%. Mountain biking opportunities on certain key trails are completely eliminated by this closure.

The complete closure of these WSAs must be justified not only by accurate data on wilderness character, but also by accurate data on the full impact to mountain biking. As it stands, this closure rests on faulty presumptions. In ordering this objection period, the court acknowledged there is a great deal of “confusion” about the closure’s true costs.³² Until it can correctly calculate the absolute and relative amount of trail closed to mountain biking, the Forest cannot justify the complete closure.

II. Remedies

To address the issues raised above, the Forest should reverse the wholesale prohibition on bike use of the Bluejoint and Sapphire WSAs and reinstate bike access to these landscapes. In the meantime, the Forest must gain a better understanding of past and current conditions and monitor for positive or negative changes to wilderness character. The Forest must demonstrate what the baseline of use was at some reasonable point in time, show how that use has changed, and show if that use impacts wilderness character or actually improves it through the volunteer trail stewardship by bicyclists that typically follows the privilege to access the area by bike. The Forest certainly must also gain a better understand of the true impact on mountain biking opportunities these closures have.

To monitor for claimed or potential impacts, the Forest should institute a wilderness character monitoring program, if and where necessary, determine measures needed to adjust management incrementally to protect mountain biking access while protecting wilderness character in the Sapphire and Blue Joint WSAs and determine what the risk:benefit is of allowing access with the stewardship return that follows through trail clearing and maintenance. Putting aside the misplaced concern for political constituencies, all that remains to attempt to justify the Forest’s complete closure are the

³¹ No. CV 16-158-M-DLC, 2018 WL 3201803, *11 (D. Mont. June 29, 2018).

³² *Id.* at *11 n.7.

fleeting social impacts of mountain biking. These impacts are not reflected in the data, which hardly show increased use, much less decreased wilderness character as a result of mountain biking and do not cross compare that with the value (both in cost savings and user experience) brought forth through volunteer stewardship of these very trails.

Especially in the absence of data, the Forest should monitor mountain biking in these WSAs and utilize incremental adaptive management. The Forest should establish not only how much mountain biking occurs in these WSAs, but more importantly, what impact this volume of use actually has on these WSAs' wilderness character compared to the value gained through their stewardship. Determining the amount of mountain biking is just the start; if the Forest is going to reduce mountain biking, it must ground its decision in demonstrable decreases in wilderness character resulting from social impacts.

Only if the Forest can demonstrate decreased wilderness character when adjusted for the value gained from stewardship should it limit mountain biking. While it is certainly expedient and convenient to institute a complete closure, this drastic management action is not only unnecessary and detrimental to public access, it is contrary to law and policy. Instead of a complete closure, the Forest should manage how much, where, and when mountain biking occurs in these WSAs, if the Forest shows decreases to wilderness character. IMBA stands ready to work with the Forest to design and implement management approaches that do not burden the Forest and allow continued mountain biking in these WSAs.

III. Conclusion

Thank you for your consideration. We look forward to the opportunity to discuss these issues and seek resolution.

Sincerely,



Aaron Clark for
International Mountain Bicycling Association