



BLM Public Lands Rule- Review

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Background- Why a Rule?

The Bureau of Land Management (BLM) is the largest land management agency in the U.S., managing one-tenth of America's land base (or some 245 million acres). The BLM is host to hundreds of miles of some of the [best mountain biking trails](#) in the world from [Virginia](#) to [Colorado](#), [Utah](#), [Oregon](#) and [California](#), and numerous other western states, and it is also host to a large and growing number of [eMTB trails](#). For many years IMBA has worked closely with the BLM, partnering to champion mountain bike access in rural communities throughout the west. Together the BLM and IMBA are "[Connecting with Communities](#)" through a national partnership. IMBA was instrumental in helping the BLM develop the "[Guide to Quality Trail Opportunities \(GQTE\)](#)" used by managers for trail development. In August of 2023, while the Public Lands Rule was being finalized the BLM also released their new [Blueprint for 21st Century Outdoor Recreation](#) which includes overlapping elements with the Rule seeking durable change through proactive investments in outdoor recreation by working with partners and communities to, in the words of the BLM, "manage for exceptional and one-of-a-kind recreational experiences that invite all to share in the enjoyment and stewardship of their public lands and waters".

The BLM is well known for its multiple-use mandate. Examples of the many uses the BLM provides and manages include the following:

- renewable energy development (solar, wind, other);
- conventional energy development (oil and gas, coal);
- science and research (of natural, cultural and historical resources);
- livestock grazing;
- tribal ceremonies and spiritual traditions;
- wild (feral) horse management;
- hardrock mining (gold, silver, other);
- timber harvesting; and
- outdoor recreation (such as mountain biking, canyoneering, hiking, camping, hunting, fishing, rafting, and off-highway vehicle driving and more).

Managing all these uses effectively requires balance and compromises. Future site-specific decisions, like a mountain bike trail system, are informed and regulated by federal rules, laws, and the landscape scale management plans that follow and set the sideboards for on-the-ground management decisions. Engaging throughout helps guide and influence the planning process.

Now that the final rule is complete, the term “conservation” has joined that list of “uses” above. This was done to elevate the role of resource conservation as a valid and necessary “activity” of public land management.

According to the BLM, the new Public Lands Rule lays out a framework for “conserving wildlife habitat, restoring places impacted by wildfire and drought, expanding outdoor recreation, and thoughtful development” by better managing the conservation of resources to ensure continued multi-use.

Unlike many of the above principal uses under the Federal Land Policy and Management Act (FLPMA), sustainable outdoor recreation— like mountain biking— is non-consumptive and uniquely compatible with conservation. Trail-based activities like mountain biking are driven by, and dependent upon, the opportunity to interact with the unique features of well-protected and well-managed natural landscapes. Trail-based recreation effectively provides low-impact planned and manageable public access that protects important resources and habitats.

However, while recreation like mountain biking is far from the most impactful land use (resource extraction, grazing, development, OHV) it is not without its impacts. The impacts from population growth and climate change are exacerbating already challenging conditions that have been driven by politics, agency budget cuts, and under-management.

In theory, better management of resources should make land health more sustainable, affording the flexibility and continued diversity of public use. The BLM’s Public Lands Rule seeks to achieve that. Certainly, high-quality mountain biking experiences rely heavily on the BLM to meet these goals. This is why IMBA supports the concept of the Public Lands Rule.

The public demand for recreational access is the greatest readily available and renewable resource we have for long-term conservation. It motivates, compels, and mobilizes an army of individuals to visit, volunteer, donate, apply political pressure, and support measures that result in well-conserved lands. These philanthropic activities by people like the hundreds of thousands of mountain bikers and IMBA members occur across our public lands and the BLM is no exception. IMBA has long calculated that our members contribute one million plus volunteer hours every year stewarding public land trails and providing our land manager partners millions of dollars in cost savings.

The Public Lands Rule intends to address current shortcomings in management related to land health to better ensure the "health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." The Rule elevates "conservation" as a unique use for protection and restoration, and claims the intent of this rule is one of *process*. This Rule will help the BLM better manage for all the various uses of public lands including recreation.

In the spring of 2023, IMBA's Government Affairs team commented extensively on the draft BLM Rule. [Our comments](#) focused on the overlapping compatibility of the goals of the rule with recreation access and management. IMBA recognized that the Rule, being process-oriented, would not make any changes on the ground itself but would establish a trickle-down framework for field office-wide and site-specific future management focus within resource management plan revisions and travel plans for decades to come. Because of this, IMBA's focus was on ensuring that sustainable recreation received a fair shake.

Sustainable recreation implies there is unsustainable recreation, and that is the case. Unsustainable recreation is unplanned and unmanaged recreation, which unfortunately is the type of recreation that results, for example, as communities grow and seek access and enjoyment to their cherished public lands, yet quality access is absent or denied. Unsustainable recreation is when overuse or misuse leads to degradation and irreparable impacts on natural resources like soils, water quality, species habitat and wildlife. Conversely, unsustainable recreation management can also be when competing uses are proposed or developed in manners that overlap with existing recreational assets or otherwise detract from the values that attracted people to the place (ie. viewshed, soundscape, etc). This results in unsustainable abandonment of the asset over time.

Recognizing these facts, IMBA focused on recommendations for the top components of the draft rule such as the newly proposed **conservation lease program**, heightened focus on **Areas of Critical Environmental Concern (ACEC)** designations, and on better defining **intact landscapes**, **casual use**, and a host of other terms raised in the draft. Our goals were to help support the BLM with concepts that demonstrated the compatibility of recreation with conservation through thoughtful and purposeful planning. In the fall of 2023, we met with BLM leadership at their headquarters in D.C. to discuss the specifics of these concepts in more detail. The end result was effective as numerous issues were improved in the final Rule.

Continue reading for a brief analysis of each section of the BLM's final rule and its relevance for trail advocates and mountain biking.

Final Rule Components:

How did IMBA's comments shape the final rule? We were not alone in our trepidation about how the rule could negatively impact recreation. Our comments and recommendations were echoed by many others. Numerous indications demonstrate how our advocacy helped shape the rule for the better which we will describe below.

Rule Objectives

First and foremost, in response to our and others' comments, the BLM expanded the objectives of the rule to include the following new objective:

“provide for healthy lands and waters that support sustainable outdoor recreation experiences for current and future generations”

This was added to explicitly address the concerns expressed regarding potential impacts to recreation. We were clear that, while the intent may not be there, the rule must not be weaponized to unnecessarily curtail recreation access. The spirit and intent needed to be more clear. This statement goes a long way toward demonstrating that future management decisions made on BLM lands will tie back to these objectives by stating:

“As the BLM implements the rule, recreation management decisions will incorporate the objectives and principles outlined in the rule to support landscape health and ecosystem resilience.”

Finally, the BLM made clear that there is room for the growth of outdoor recreation by stating:

“The rule is not intended to prevent or decrease outdoor recreation use; rather it ensures that recreation on public lands can be managed and grow sustainably while benefiting from the conservation of healthy lands and water.”

What does this mean for trail advocates and mountain biking?

Including an explicit objective in the rule to support outdoor recreation is a very positive improvement to the overall spirit and intent of the rule. We can point to this during the planning process and ask how this objective is being met when the various elements discussed below are being implemented.

Restoration and Mitigation Leases

The BLM proposed a new concept in the draft rule that they hoped would allow the public to directly support durable protection and restoration efforts to help build and maintain the resilience of public lands. This program was proposed as a “Conservation Lease”. We commented heavily on this element of the rule as it had many potential flaws beginning with how the BLM staff were inconsistent in their descriptions and the high potential for the program

to be abused. We wanted an action-based program that focused on active restoration. The BLM heard us and changed the final program to a Restoration and Mitigation Lease program where leases are issued with a defined purpose and scope with identified outcomes tracked and monitored.

Another expressed concern was that the lease program could be used to evict recreationists under the guise of land protection or restoration through a lease that simply “protects” existing character from uses like mountain biking. The BLM also heard and responded positively to this concern by stating:

“While a restoration or mitigation lease is in place, casual uses of the leased lands, such as recreation, hunting and fishing, and research activities, would generally continue. “

What is casual use? The final rule defined the term “casual use” to help clarify that a restoration or mitigation lease would not, in and of itself, preclude public land access for noncommercial activities such as recreation. The BLM states that while an authorized officer ***“may temporarily close public access for purposes authorized by restoration and mitigation leases, such as habitat improvement projects.....public lands leased for these purposes under the final rule would continue to be open to public use.”*** and that access to or across leased areas for recreation use would continue.

The final rule was modified to include an incentivization clause stating the BLM will give extra consideration to lease applicants that ***“collaborate with existing permittees and other affected interests and meet other desirable criteria”***.

This will help recreation interests have a seat at the table should it be necessary. The final rule enumerates this incentivization later in the rule to state that ***“the authorized officer to consider when evaluating a lease application[leases] that are consistent with the management objectives and allowable uses in the governing land use plan, such as an area managed for recreation...”***

While no BLM document will ever guarantee recreational access, these incentives go a long way towards demonstrating that the BLM intends for this rule to aid in their collective coordinated management for the benefit of all sustainable management, including recreation.

What does this mean for trail advocates and mountain biking?

Recreation advocates will need to help define themselves and more importantly their trail-based recreation as a sustainable form of “casual use”.

Compensatory Mitigation (CM)

This issue is a complicated one for the future of recreation and the BLM rule does not clear it up further. I encourage readers to explore this in greater detail than can be addressed here. CM could both impact nonprofit organizations and benefit recreation assets in some scenarios. Simply put, CM is generally required to address unavoidable impacts of a project or authorized

use of the natural functions of an area or landscape. To date this has been traditionally stipulated upon industrial developments, resource extraction industry for example and applied to wetlands, streams, waterways and other related and degraded resources. Funds are often collected, pooled, and invested in projects that mitigate their impacts elsewhere. In a scenario where a solar development or mining project might destroy a trail system as part of a broader environmental impact, a compensatory mitigation in lieu fee program could help restore lost habitat and/or the lost trail assets in another location which could benefit recreation. This would be accomplished via mitigation funds distributed by a fund holder commensurate with the same type of resources or assets elsewhere. The CM funds could conceivably go to a non-profit to help re-create the trail system in another appropriate location as part of the restoration of losses if the losses were to an existing asset. This may seem like a stretch but it's not unprecedented in the private land sector. This is relatively rare but with the recent BLM Solar Programmatic EIS, there were greater than 1500 miles of mountain bike trails and remote roads overlapped with potential solar lease sale landscapes that could permanently impact bike access where the CM concept could be applied to benefit/restore recreation. Realistically, however, most CM funds will go to resource restoration and mitigation projects.

The question remains, however, will mountain bike use and trail development get characterized as having unacceptable impacts that get saddled with CM requirements as well?

In recent years, some within the federal agencies and specifically the BLM have begun hinting at a desire to require CM for recreational trail systems and recreational developments themselves. CM is generally an expensive endeavor yet justified by the high profits and deep pockets of the corporations that propose the impactful projects which often turn public land parcels into single-use zones of industrial activity. These corporations make a profit off of public lands and therefore have a responsibility to compensate for the impacts and ecological losses and mitigate them somewhere else. If CM were to be required of nonprofits for trail proposals like a mountain bike trail, for instance, it would be a devastating blow to their non-profit work. Nonprofits are not corporations profiting from, for example, trail projects, nor do they occupy a landscape for any period or turn it into single or exclusive use. Trails are for the public good and they serve all. A project might involve a short-term construction phase with a contractor supported by a volunteer crew but the land remains publicly accessible and control and management is always in the hands of the agency. Trails developed or maintained by nonprofits typically are free to all, the nonprofit receives no financial benefit so the difference between a corporation extracting and a nonprofit building is vast.

Would a possible CM be applied simply for the short-term build phase or the much longer term of public use were questions we posed in our comments. Once a nonprofit completes a build they are no longer a permit holder. If CM funds were required upfront for a project what would the term be? While any human presence on the land has, on some level, an effect on our natural environment, a planned and managed system of sustainable linear features serves to avoid, minimize, and mitigate greater impacts that would occur if no planning were done. We believe that the BLM staff who have raised these concerns are mainly responding to the gross underfunding they face on an annual basis and looking for answers. With greater demand for

outdoor recreational access, the agencies are crippled with historical budget cuts that leave them understaffed, underfunded, and desperate for solutions to meet their land health goals. They see the greater demand and incoming proposals for trails and are not sure how to pay for them. There is also the complicating factor that BLM lands are often the high-priority winter habitat when situated adjacent to higher-elevation forest service lands that are covered in wintertime snowpack. This causes an overlap of trails with habitat that can be difficult to avoid.

In response to the concerns expressed on this issue, the BLM has left this issue open but tried to soften the blow by stating:

“Some commenters narrowed their concern to how compensatory mitigation may specifically impact recreation, which can significantly degrade public resources, and urged that the rule not apply compensatory mitigation requirements to nonprofit organizations, and that ongoing trail use not be subject to such requirements. In response to these comments, the BLM added mitigation principles to the final rule to provide a framework for how mitigation will be deployed under the rule, including through the mitigation hierarchy and mitigation leasing. The principles are consistent with agency policy and guidance for implementing mitigation, such as developing landscape-scale mitigation strategies, requiring performance criteria and effectiveness monitoring for mitigation programs and projects, and ensuring that compensatory mitigation is durable, additional, timely, and commensurate with adverse impacts.”

What does this mean for trail advocates and mountain biking?

The mountain bike community needs to better educate agency leadership on the role of trails as an effective tool for resource conservation rather than an option competing with environmental protection. One only has to ask what would happen to our public lands if recreation were not planned and provided for. Loss of public value and impacts of unplanned and unmanaged use would result. Nonprofit organizations should also be more assertive in seeking CM funds for impacts on recreational trails. Lastly, the monetary value of volunteer stewardship, maintenance, and trail building needs to be better calculated and leveraged for these conversations. IMBA will carefully engage in these conversations to defend against what amounts to onerous taxes for providing public trails for all.

Areas of Critical Environmental Concern (ACECs)

The BLM manages ACECs to protect, preserve, and enhance important resources like cultural, historical and scenic sites and/or special species that have been identified in agency planning. In some rare instances, ACECs are also managed to address natural hazards to protect public safety. ACECs are unique to the BLM and they are required to prioritize identifying and designating ACECs in their management plans. Traditionally, this has been through a combination of public nomination and agency-led identification. For context, this administrative prescriptive layer has been applied to [over 1100 polygons across the west](#) with most being a few hundred to a few thousand acres. However, some are in the hundreds of thousands and

even up to 1.5 million acres with examples in Alaska. While trail-based recreation is not prohibited in ACECs, authorizations for such are usually limited due to the focus on resource conservation. IMBA has found ACECs to be neither a place to propose new trail development, nor a grave threat to access. Local groups usually work trail systems to avoid them and existing trails in ACECs are minimal.

The new rule tossed the future of this otherwise copesetic relationship into question. Would an increased goal and focus on more ACECs lead to overlap with existing or future trails and cause conflict and limit access? It's possible but wholesale access loss is unlikely as recreation would most likely already avoid these places and significant recreational development in a candidate location would most likely preclude designation in the planning process.

According to the BLM, *“ACECs must meet three criteria: relevance, importance, and need for special management attention.” “The rule clarifies that an ACEC can be designated to protect ecological intactness and habitat connectivity, emphasizing the role of ACECs in maintaining resilient lands and waters.”*

In line with our comments, the new rule confirms that ACECs are to be addressed in resource management plan revisions and amendments. But the BLM also states that it will administer designated ACECs to only *“allow casual use or uses that will ensure the protection of the relevant and important values”*.

However, if the BLM determines that a nomination meets the criteria for designation AND determines that the important values could be irreparably harmed if not protected, the BLM could implement emergency and temporary protections until it is evaluated in a planning process which could be a multi-year order. This will again require monitoring of agency actions.

What does this increased focus on ACECs mean for trail advocates and mountain biking? Generally, advocates will need to be aware of the ACEC nomination process, remain in tune with the landscape and the goals of other stakeholders and public interest groups, and track these issues in the planning process to weigh in appropriately and as needed. Know that recreation is not automatically banned nor is it explicitly allowed. As advocates, we need to be aware of resource issues of the broader landscapes we work with so that we may head off opportunities and threats before they materialize. Again, relationships with diverse stakeholders is critical.

Intact Landscapes

The BLM understandably seeks to protect landscapes that are intact from a flora and fauna standpoint so that species and their habitat can thrive and be resilient in the face of climate change. Fragmentation is never a good thing but sometimes it is seen as unavoidable in a populous world. Limiting fragmentation, therefore protecting intactness, is a worthy goal.

In light of this, IMBA asked for more clarity on the size, scope, and characteristics of intact landscapes and suggested the BLM establish a baseline inventory to evaluate conditions.

IMBA and other public commenters suggested that the rule distinguishes intactness as a resource value in and of itself versus intact landscapes as delineated units. The BLM capitulated and flipped the term to better reflect this. "Landscape Intactness".

The BLM defines "intact landscape" to mean "*a relatively unfragmented landscape free of local conditions that could permanently or significantly disrupt, impair, or degrade the landscape's composition, structure, or function. Intact landscapes are large enough to maintain native biological diversity, including viable populations of wide-ranging species. Intact landscapes provide critical ecosystem services and are resilient to disturbance and environmental change and thus may be prioritized for conservation action.*" For example, the characteristics of intactness would be "*minimal fragmentation from roads, fences, and dams; low densities of agricultural, urban, and industrial development; and minimal pollution levels.*"

The final rule directs the BLM to maintain an inventory of landscape intactness as a resource value and identify intact landscapes in land use plans and then protect the intactness of certain landscapes. Inventories of landscape intactness focus on an assessment of naturalness measured against human-caused disturbance and influence. The BLM intends to assess intactness through the use of watershed condition assessments.

What does landscape intactness mean for trail advocates and mountain biking?

Trail-based recreation is far less fragmenting than roads and industrial development but trails can contribute to habitat fragmentation on a local scale and can contribute to invasive species which can further degrade native species. Importantly, the Rule states that the BLM must focus on "*protecting the most intact, functioning landscapes*", they do not suggest they need to protect all intact landscapes. An inventory that may identify conditions of intactness in a location with existing recreation would therefore demonstrate that the recreation is being managed concurrently with the high function and composition of that landscape's resources and therefore could continue with a similar management focus. Advocates should generally agree that cross-country (off trail) recreation can be unsustainable and aim to instead demonstrate that trail-based recreation is a successful and necessary management tool to protect ecological integrity and intactness by avoiding sensitive resources through linear travel features.

Casual Use

The rule defines "Casual use" as "*any short-term, noncommercial activity that does not cause appreciable damage or disturbance to the public lands or their resources or improvements and that is not prohibited by closure of the lands to any such activity.*" Recreation is a casual use when it is authorized on a parcel of public land. IMBA and many others were concerned with the ambiguity of the use of the term in the Rule. Our comments sought better assurances that recreation would be seen as a casual use and would not be automatically precluded from lands leased for mitigation and restoration and that casual use was better defined. The BLM left the term defined as it was due to its existence elsewhere in federal code but the BLM did add clarity to the issue in the rule that casual uses like recreation to and across lands would not generally be precluded.

What does this mean for trail advocates and mountain biking?

Recreation can be raised as an activity that is seen as compatible with the intent of the rule. Mountain biking is seen as a “casual use”.

Significant Causal Factor

Significant Causal Factor definition: The final rule defines “significant causal factor” as “a use, activity, or disturbance that prevents an area from achieving or making significant progress toward achieving one or more land health standards”. The identification of such a factor would trigger the BLM to address the cause of harm appropriately and modify their management accordingly to achieve or re-achieve land health. The rule requires the BLM to document a determination of the “significant causal factor” when desired resource conditions are not making progress or being achieved at their desired land health standards. When the BLM determines that its current management direction is contributing to this “significant causal factor”, then the BLM is required to take action to modify and alter management.

What does this mean for trail advocates and mountain biking?

If existing trail-based recreation is deemed a “significant causal factor” in a particular landscape in not meeting land health standards, then the BLM would have to shift management to address it. That could lead to significant closures. The BLM should always seek to employ adaptive management in the least restrictive ways first. The BLM should also help allow stakeholders to address use or management concerns before they become significant factors. If the legitimacy of a claim is in question, such as with claims of loss of Wilderness character due to the presence of bicycles, or with a hypothetical example of a trail closure only to bikes but left open for foot and horse travel, mountain bike advocates must request the documented determination of the measurable and observable circumstances as required by the rule that demonstrate proof to support the claim or action. The rule allows for modification to management versus drastic changes that amount to loss of access. Appropriate modifications could be seasonal closures, route rightsizing, or other actions that mitigate impacts in the least impactful manner. Additionally the BLMs 2023 [“Blueprint for 21st Century Outdoor Recreation”](#) highlights the need for proactive and adaptive management adjustments to avoid loss of access. We do not expect this to be a significant threat but advocates should be aware of this and know the required elements that must accompany it.

Tribal Nations and Environmental Justice

Tribal Nations: The BLM Rule rightfully seeks to better incorporate tribal consultation, indigenous knowledge and engagement, and to seek co-stewardship with tribal governments of their ancestral homelands. The BLMs 2023 “Blueprint for 21st Century Outdoor Recreation” also highlights these goals for recreation and states that recreation can help achieve both awareness and respect of cultural values but also protection of these valued resources through planned and managed trail development.

Environmental Justice (EJ): The final rule highlights the importance of EJ in decision-making, including advancing EJ through restoration and mitigation actions as one of the rule’s objectives.

What constitutes environmental justice is broad and diverse. The rule speaks to this issue in the context of meeting EJ objectives through their restoration and mitigation leases, but the BLM is required to address this issue through all manners of their initiatives and policy goals. Again, the BLMs 2023 “Blueprint for 21st Century Outdoor Recreation” also highlights these goals through equitable and inclusive outdoor recreational access.

What does this mean for trail advocates and mountain biking?

Working with tribal governments and seeking co-management opportunities does not mean that the general public will lose its voice and opportunity to comment on the NEPA process. Rather this presents an opportunity to expand relationships to meet the needs of a more diverse community that surrounds public lands. That creates an opportunity for improvement. There are great examples of the recreation community working alongside tribal communities but this is also an area with high potential for improvement. Trail-based recreation like mountain biking may not be a traditional use of these lands but it does pose opportunities for developing strong healthy vibrant communities that can glean sustainable value from public lands and highlight and educate about traditional values. Improving upon relationships may lead to opening doors for collaboration and joint value for local communities. The recent momentum around these issues is promising.

Equitable public land access is also an EJ issue and this should be raised during conversations with the BLM when access improvements to underserved communities or to provide access to healthy lifestyles can be achieved during the planning process. The relationship of this Rule with the BLMs “Blueprint for 21st Century Outdoor Recreation” is also important to raise. Recent executive orders stress that advancing environmental justice requires investing in and supporting culturally vibrant, sustainable, and resilient communities. These values are very much in line with sustainable activities like trail-based recreation such as mountain biking to ensure that communities are healthy and their economies vibrant and that recreation is occurring in the proper locations.

Conclusion- What's next for mountain bikers?

Simply put, the final rule does not change anything on the ground immediately. The final rule sets a framework to elevate the tools for land protection, restoration, protection, and conservation in future Resource Management Plans (RMPs) and subsequent site-specific and project-level planning through National Environmental Policy Act (NEPA) planning. The rule will also apply to new BLM-managed National Monuments. The Federal Land Policy and Management Act (FLPMA) establishes that public lands be managed in a manner that will provide for outdoor recreation among other things. However the ability of the BLM to provide for outdoor recreation is somewhat predicated on the effectiveness of the function and quality of the natural environment. It is no accident that in August 2023, the BLM published their new Blueprint for 21st Century Outdoor Recreation while this final Rule was being completed. There is a lot to support in this recreation document that can compliment the Rule if advocates continue to make those logical connections. Outdoor recreationists have a vested interest in helping maintain a high-functioning ecosystem. That requires balanced management. What this means is that we can't recreate everywhere at all times. There will and should be limits to

access and sometimes resource concerns or degradation will lead to recreational access restrictions.

Trail advocates and mountain bikers will need to, as always, continue to engage in the public comment aspects of the NEPA process and develop strong relationships and partnerships with a broad and diverse set of stakeholders. Armed with the knowledge of the landscapes for which the NEPA process is addressing, this rule, and other relevant agency regulations, the advocates can better inform and influence the process for their goals. IMBA staff remain available to help assist local mountain bikers and organizations in navigating the increasingly complex federal regulatory structure. Check out tips and resources on [engagement and advocacy](#) on IMBA.com. Fill out the [Action Cultivator Tool](#) to get assistance from IMBA staff.

A handwritten signature in blue ink, appearing to read 'A. Clark', with a long horizontal flourish extending to the right.

Aaron Clark – Government Affairs Policy Manager
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