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September 19, 2014

Mike Dietl <michaeldietl@fs.fed.us>
Forest Service
Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

Re: Inyo, Sierra, and Sequoia National Forests Land Management Plans Revision #3375
Proposed Wilderness Additions
Pacific Crest National Scenic Trail Corridor

I thank you for the opportunity to comment on the National Forests Land Management Plan Revisions for the Inyo, Sierra, and Sequoia National Forests. CORBA, the Concerned Off-Road Bicyclists Association is an all-volunteer, member-based nonprofit organization representing off-road cyclists from Los Angeles and Ventura Counties. We are a chapter of the International Mountain Bicyclists Association.

Many of our members and the thousands of off-road cyclists we represent, myself included, regularly travel to these three National Forests to seek out mountain biking recreation opportunities. We are concerned with the current wilderness inventory that has the potential to close many existing trails to mechanized and motorized recreational use. We must therefore vehemently object to the proposed wilderness additions, especially any area that contains existing multiple-use trails, or that have the potential for future additions to the multi-use trail network.

We see many problems associated with wilderness designations. Trails in wilderness must generally be maintained by non-mechanized means, which is more labor intensive, more costly and takes more time. The Forest Service is already unable to meet their current trail maintenance needs, let alone their immense maintenance backlog. Mountain Bikers and OHV users have been exemplary stewards of the trails, assisting the the Forest Service by maintaining and adopting many trails in these and other National Forests. The Forest Service would lose the support of these user groups for maintaining trails within the proposed wilderness additions, as they have already lost their support for trails in existing wilderness. This will only increase and exacerbate the forests' trail maintenance backlogs.

As a user group mountain bikers enjoy our public lands for many of the same reasons these lands are protected: for the solitude, beauty, wildness, scenery, as well as their ecological values. As a group, mountain bikers are passionate about our open spaces, and are happy to see them protected. However, Wilderness is not the only--and oftentimes not the best--tool to protect these treasured landscapes.

Other protection alternatives exist that are less burdensome on the Forest Service, and allow continued recreation by a greater proportion of the population. The NEPA process ensures that any plans that may impact the wilderness character of these special landscapes will be adequately studied and appropriately protected and managed. We prefer to see designations other than wilderness.

Mountain bikers seek a variety of trail experiences. Some seek downhill thrills, others a good workout in the clean air of a natural setting. Some are destination-oriented, riding bicycles to a known vista or scenic point, mountaintop or other place of interest. Some seek solitude and true backcountry experiences in remote and pristine natural settings on long-distance routes. And most seek all of the above at some time in their cycling travels. Yet increasingly, the remote backcountry cycling experiences are being taken away through wilderness designations and other restrictions. It is increasingly difficult to find remote, pristine, long-distance backcountry routes that are open to bicycles. Mountain bicyclists have lost access to many places where we once enjoyed these experiences in the (now) wilderness areas of Los Padres National Forest, the Angeles National Forest, and in all the forests of the Sierra Nevadas. Mountain bikers as a community are growing, increasing demand for multi-use trails, at a time when our access to trails is being reduced.

This reduction of opportunities for bicycling recreation on natural-surface trails unnecessarily concentrates use and impacts on fewer and fewer trails. Currently more than 50% of the Sequoia National Forest is designated wilderness. The proposed additions would substantially increase that amount, and thereby limit future opportunities for backcountry recreation, and increase use on non-wilderness trails.

Many of the trails that would be closed to bicycles by these wilderness recommendations are by their very nature self-limiting. Many are long-distance, high-elevation, difficult to access, and demand a high level of backcountry self-sufficiency, preparedness, fitness and skill. They are not heavily used, and never will be, so the impacts of bicycles on these types of trails is minimal, and certainly no more than that of hikers. The opportunities for this type trail experience are being diminished by wilderness designations around the country. We must protect not only the landscape, but the availability of these types of trail experiences for bicyclists.

Existing trails, which currently see predominantly motorized and mechanized use, pass through areas that are being considered for wilderness designation in the current inventory. Yet the historic use of these trails by these user groups has not diminished the so-called “wilderness characteristic” of the landscape, or they would not be being considered for wilderness at this time. Allowing continued access by these user groups through an alternative designation to Wilderness, that also provides sufficient protection for the landscape, would be the best management direction. This would allow these user groups to not only recreate, but also serve as partners and stewards through volunteer trail maintenance.

Another possible alternative would be to create language-based wilderness exemptions or cherry stems for specific trails. Language-based exemptions have an advantage over cherry-stems in that they do not create additional wilderness boundary length, they are more easily managed, enforced and maintained, and do not require an act of congress to re-route the trail as necessitated by natural phenomena such as landslides. Cherry stems allow continued use by otherwise prohibited users, but increase boundary length and signage requirements. Another potential problem with cherry stems is exemplified by the

Toad Springs trail (22W01) in the Chumash Wilderness of the Los Padres National Forest. A portion of this trail was lost to a major landslide in the early 2000s, and made it impossible to rebuild the trail within the defined cherry stem. The trail was subsequently closed and is now lost as a through route to all users, despite the wilderness bill's original intention to keep it open for multiple use. If any wilderness additions are being considered, we urge the Forest Service to consider either language-based multiple-use exemptions (preferred) or cherry stems that allow continued use of the trails by these user groups.

Mountain Biking is growing, and has seen a steady uptick in participation rates. It is now a high school sport, with many thousands of high school- and middle school-aged children engaging in mountain biking as a healthy form of outdoor recreation, personal development and friendly competition. For many of the student-athletes in the National Interscholastic Cycling League, off-road cycling is their primary--and oftentimes only--outdoor recreational activity and connection to nature. High school mountain biking is growing nationwide, and with them a new breed of recreationalist and conservationist is coming of age. Most who have participated in high school mountain biking continue to ride off-road after their graduation. Reducing the number of trail opportunities for bicycle use available to these future generations is the wrong action at this time. We need to be expanding trail opportunities to encourage more children to find their connection to nature through their recreational activity of choice, not reducing trail opportunities.

Limiting access to trails by bicycles through wilderness designations will also negatively impact local tourism-based economies. Mountain bikers are known to travel and seek out unique trail experiences in many different settings. The economic impacts of their mountain bike tourism dollars have turned many smaller towns around financially, and supplemented the tourist-based economies of those smaller towns. Kernville is one such town, where off-road cyclists and OHV users have a significant positive impact on the local economy. These impacts must also be considered before recommending any additional wilderness areas.

Pacific Crest Trail National Scenic Trail Corridor

We also have objections to the language in the Pacific Crest National Scenic Trail Corridor section of the detailed proposed action. The desired conditions state that it is "permanently protected to provide outstanding primitive hiking and horseback experiences." There are other National Scenic Trails that allow and specifically mention bicycles. The preferred language would be "permanently protected to provide outstanding trail experiences."

The current order prohibiting bicycles from the PCT was not intended as a permanent order, went through no public review process and was enacted by three lone forest service field staff in the same manner as any temporary order would be enacted. The decision to prohibit bicycles from the PCT has never been reviewed publicly, has never been justified or documented. No objective process or justification was given for the order that would warrant what is essentially a temporary order to be in place for more than 25 years. The current closure order prohibiting bicycles on the PCT may be in direct violation of the Administrative Procedures Act that guarantees public participation in the rulemaking process. Under Standards, point 3, where it states that "...bicycles and other mechanized transport ... is prohibited on the PCT tread and within the trail corridor..." " is therefore inappropriate in this document, as that has not yet been determined by a legally-required rulemaking process. We are

confident that the blanket ban will be overturned when such a process is conducted fairly and objectively, and we object to using this document to circumvent such a process.

The point that “roads and motorized trails do not intersect the trail except at designated crossings” unfairly restricts other user groups’ access to and enjoyment of trails that are not the PCT. It unfairly limits options for loop routes, and east-west point-to-point routes. Already the PCT bisects and separates many different areas in our National Forests that would otherwise be viable trail loops or long-distance route options for cyclists. The prohibition of bicycles within the proposed corridor, and not just on the PCT itself, is extremely troublesome.

We also object to a third-party non-governmental entity being given management discretion over our public lands. Under Guidelines, point 1, requiring the approval of the Pacific Crest Trail Association for any new trails is exactly that: management of our public lands by a non-public entity. We must question not only the appropriateness of this arrangement, but also the legality.

Instead we call for a fully public process to reconsider the ban on bicycles on the PCT. Until such time as this process is completed, we must object to the current language of the Detailed Proposed Action with regards to the PCT corridor.

Thank you for your time and consideration of these comments. I look forward to continued participation in the management plan revision process.

Sincerely,



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CC: r5planrevision@fs.fed.us
Chris Horgan, Stewards of the Sequoia
Pacific Crest Trail Reassessment Initiative

About CORBA: The Concerned Off-Road Bicyclists Association (CORBA) is an all-volunteer 501(c)(3) nonprofit, and a chapter of the International Mountain Bicyclists Association (IMBA). Formed in 1987, CORBA works with land managers and the off-road cycling community at large to foster off-road cycling as a healthy, sustainable outdoor recreation in Los Angeles and Ventura Counties. CORBA is dedicated to preserving open space, maintaining public access to public lands, and creating more trail opportunities for all to enjoy. CORBA works with California State Parks, National Park Service, Forest Service, Mountains Recreation Conservation Authority, Conejo Open Space Agency, as well as other local City and County government agencies. Our Volunteer Trail Crew, Youth Adventures, Free Skills Clinics, CORBA Kids Club and other programs promote off-road cycling recreation, and the responsible use and stewardship of our trails and open spaces.