



September 22nd, 2016

Mr. Ryan Buerkle
Ashley National Forest
355 North Vernal Avenue
Vernal, UT 84078

Re: Ashley National Forest Plan Revision

Dear Mr. Buerkle,

Please accept this comment letter from the International Mountain Bicycling Association (IMBA) and our chapter, Northeastern Utah Mountain Bikers (NUMB) based in Vernal, UT regarding the Wilderness evaluation phase of the Forest Plan Revision for the Ashley National Forest (ANF). We thank you for your work in managing our public lands and we commend you on taking diverse opinions into account and using them to develop the final plan.

Founded in 1988, IMBA leads the national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 750 Chapters and supporting organizations, and 600 dealer members. Our mission is to *'create, enhance and preserve great mountain biking experiences'*. IMBA teaches sustainable trail building techniques and has become a leader in trail design, construction, and maintenance. We encourage responsible riding, volunteer trail work, and cooperation among trail user groups and land managers. Each year, IMBA members and clubs conduct more than one million hours of volunteer stewardship on public lands and are some of the best assistants to federal, state, and local land managers. As a quiet human powered form of recreation, bicycles have impacts on natural lands that are comparable to any human activity. Unmanaged recreation always has the potential to create adverse impacts on the environment. However, thoughtful management can avoid those effects while still allowing the public to experience these environments.

Our conservation focus - on a practical level our conservation efforts are focused on developing sustainable trails, the genesis of which begins with working with land managers to locate trails correctly, in order to mitigate any potential social and environmental conflicts. In terms of trail layout, we design trails at a grade resulting in minimal erosion; these bench-cut trails follow hillside contours, rather than the steepest path down a hillside, the result is that rainwater sheets across the tread and users are concentrated on the trail surface, minimizing trail widening. On a policy level, we work with federal, state, county and municipal agencies across the USA and around the world, and with the local, national and international conservation community to ensure that mountain bike access is given high priority on public land. We believe that it is critical for our community and the public to protect the places where

we ride and recreate. Therefore, we seek to reinforce to these partners that mountain bike access and land protection is most successful if accounted for at an early stage in land use planning processes.

Rural economic benefits of mountain bike access - the development of mountain bike trail networks can provide economic benefits to a community, based on a foundation of sustainably designed and constructed trails, for example:

- Mountain bikers contribute an estimated \$25 million to the Fruita, Colorado economy, approximately 15% of the annual budget for Mesa County¹
- The Intrepid Trails system in Grand County, Utah brought in \$25,000 in state park revenue in its first year open (2009). The same year, 179,157 people visited Dead Horse Point State Park producing an economic impact of \$4.1 million²

We are currently working with many rural communities to develop mountain bike trail networks to serve as valuable recreational and educational facilities for local residents, while serving as economic engines attracting visitors to these areas. These networks allow both residents and visitors to experience natural landscapes as they recreate in these communities, including:

- Caliente, NV where we are working with the Bureau of Land Management (BLM - Caliente Field Office); Nevada State Parks; City of Caliente; Lincoln County Commission; and Lincoln County Regional Development Authority. We currently have designed around 40 miles of multi-ability trail, with the potential for an additional 100 miles of new trail.
- Superior, AZ where we are working with Tonto National Forest; Resolution Copper; and the City of Superior. Here we are working on a conceptual plan for 75-100 miles of new trail and see that this project stands to attract many thousands of visitors due to the proximity and ease of access from Phoenix, AZ.

Comments on existing conditions in the Ashley National Forest - we have the following comments to make on the areas where current mountain bike access should be maintained and improved:

- Flume trail - mountain bike access should not be restricted in any way in this area.
- The trail which descends from Lake Mountain (near Jay Point) to join with the northernmost 'lollipop' section of the Flume Trail (about a mile and a half long). The current status of this trail is unclear. We request that management prescriptions enhance this trail and not restrict use on it.
- Trails #032 and #038 (approximately nine miles of trail descending from the Horseshoe Park area south of Sink Ridge, joining Road 450 and Flume Trail - mountain bike access should not be restricted in any way in this area.
- Dry Fork Creek (a tributary of Ashley Creek) - mountain bike access should not be restricted in any way in this area. This is the most popular mountain bike trail zone on the Ashley National Forest and we appreciate the recent efforts that the USFS have made to maintain and re-route this trail.
- Dowd Mountain, on the North Slope overlooking Flaming Gorge Reservoir - mountain bike access should not be restricted in any way in this area.
- Trails #012; #015; #017; #026 - these trails are not excessively steep; they require minimal maintenance; and are located in the same general area on the north slope in

Ashley National Forest, near Spirit Lake, Sheep Creek Lake, & Browne Lake. Mountain bike access should not be restricted in any way in this area.

- Forest roads in the Grasshopper Flat area south of Taylor Mountain (including but not limited to roads #566; #565; #238; #258; #247 and; #237 - mountain bike access should not be restricted in any way in this area.

All of these areas are popular with mountain bike riders and it is essential that any management action maintains and improves that access and does not lead to a reduction in any way.

Comments on areas for future access - the Taylor Mountain area is one where we would like to see new access. We understand that this parcel is not adjacent to existing Wilderness, nor suitable for such designation. Even if it were suitable for Wilderness designation, we may challenge any Wilderness recommendation as those qualities which render a parcel as suitable for Wilderness designation are the qualities that mountain bike advocates seek, that being access to remote and wild backcountry landscapes. We generally support managing to retain these wild qualities, but instead we believe that active and adaptive management can in fact allow for continued and/or future access via mountain bike or other while still retaining these wild character that makes the area special. The key being "management". Recreation as mentioned above, requires active management, otherwise it is unmanaged. What seems to be a simple concept is often overlooked and undervalued. IMBA and our chapters seek to resolve that and encourage the the Forest Service to manage mountain biking and recreation holistically as represented by these comments.

The Grasshopper Flat area referred to above is particularly suitable for the development of mountain bike trails because the soil is less rocky than most parts of the eastern Uintas and the rolling and wooded nature of the terrain would allow the development of trails for all abilities. If trails were built as interlinked and stacked loops then thirty miles or more of trail could be developed here. In the long term this trail area could be connected (to the south) to the existing BLM trails on Red Mountain.

The area surrounding the Flume Trail and Lake Mountain would also be suitable for the development of additional trails because it is an area already used by mountain bikers and it already has a number of trailheads and parking areas. If the Sink Ridge Road (#031); the trail which connects Sink Ridge to trail #032; and trail #032 itself were slightly modified to increase their suitability for mountain biking, this could be a popular and challenging counterclockwise loop. In general the steepness of the canyon walls make new trail development difficult and trails are likely to trend toward the intermediate and advanced end of the spectrum.

Another area which may be suitable for future trail development is around Grizzly Ridge; Limber Flag Yurt; the Colton Guard Station; and Basset Springs. The ground is fairly rocky and steep in places, but trail development would not be impossible. The advantage of building here is that (a) it is easily accessible by road, (b) there are already a number of trailheads and (c) better trails would facility biking access to the yurts and guard station.

Comments on Flaming Gorge National Recreation Area - as you are aware, IMBA have completed an extensive conceptual trail plan for the the Flaming Gorge National Recreation Area, including proposing many hundreds of miles of new mountain bike trails. As such, we recommend that this Forest Plan Revision process includes the highest priority components of

that conceptual plan, recommending that they should be implemented in 2018-2019. It is our request that all of the inventoried parcels between 50 and 5,000 acres within the Flaming Gorge NRA are not considered for further Recommended Wilderness designation. This area is already a popular recreation destination, with pending plan for further trail expansion. Recommended Wilderness designation in this area would place unnecessary restriction on recreational access. Such locales are not the exclusive preserve of hikers and equestrian users as created through Congressionally designated Wilderness. Wild and remote areas are popular for long-distance backcountry bike trails, multi-day bike-packing tours, and other appropriate activities. The FGNRA is an ideal location for well-managed recreational opportunities and experiences that offer the public recreational diversity, that which is not found in Wilderness and will not be achieved by adding more Recommended Wilderness.

Comments on other inventoried parcels - our current position is that none of the inventoried parcels of any size are considered for Recommended Wilderness designation. Our position may change once we review additional materials in 2017, including the range of USFS Draft Alternatives.

Mr. Buerkle, thank you for your time in reviewing this letter. It is our hope that these comments and requests from IMBA and NUMB will be given highest consideration and implemented as the ANF proceeds through the planning process. We wish to see mountain bike access maintained on existing trails and that opportunities for additional trail development will be preserved on those parcels. Please let me know if you have any questions about our positions as stated in this letter. We are happy to discuss in greater detail or pursue as a group, solutions to any challenging aspects of future management.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Kell". The signature is fluid and cursive, with a large initial "P" and "K".

Patrick Kell
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