



September 25th, 2015

Ms. Elaine Kohrman  
Forest Supervisor  
Cibola National Forest  
2113 Osuna Road NE  
Albuquerque, NM 87113

Dear Ms. Kohrman,

Please accept this letter from the International Mountain Bicycling Association (IMBA) and our local chapter, the Albuquerque Mountain Bike Association (AMBA) regarding the current Forest Plan Revision for the Cibola National Forest, headquartered in Albuquerque, NM. Our comments in this letter specifically focus on the potential for expansion of existing federally designated Wilderness areas and the creation of new Wilderness areas, and how these proposals would impact mountain bike access.

### **Background to IMBA**

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 trail 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 our natural environment. However, thoughtful management can avoid those potential effects while still allowing the public to experience these environments. We have a chapter of active and responsible IMBA members in the Albuquerque area (AMBA) who work cooperatively with federal, state and municipal land managers to advocate for mountain bike access. Local mountain bike advocates work cooperatively in the Cibola National Forest, primarily in the Sandia Ranger District, where most recently they worked on the Three Bottles Trail to create advanced and technical trail riding opportunities. Technical and advanced opportunities like this are as important as beginner trails, trails for high school teams, and long distance backcountry routes.

## **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 with sensitive locales. In terms of actual trail layout, we design trails at a grade resulting in minimal erosion; these bench-cut trails follow hillside contours, rather than the 'fall-line' (steepest path down a hillside), the result is that rainwater sheets across a trail tread, rather than channeling down the tread, and users are concentrated on the trail surface, minimizing trail widening. The resulting trails are anchored to the land and change very little over time. More technically challenging trails can be built on steeper slopes, as long as high standards of sustainability, such as rock armoring are employed. In spring 2015 we held a rock armoring workshop in Santa Fe NM; and we have also held a similar session in Sedona, AZ with the Coconino National Forest. In October 2015 we will hold a similar session in Groveland, CA in Stanislaus National Forest, and in spring 2016 we will hold another session in Prescott, AZ with staff from the Prescott National Forest.

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

Mountain biking is a growing trail use, appealing to all ages and abilities, it can be a valuable medium to get young people outdoors healthy and active and can create future generations of stewards of our natural environment. Today's youth are not going to protect our natural world if they are excluded from it. Instead we see that getting young people outdoors and onto public land on mountain bikes creates a stewardship ethic that results in further protection of our natural resources.

Numerous scientific studies exist regarding the natural resource impacts of mountain biking showing that mountain bicycles do not disturb the environment any more than hiking. For instance, several studies show that mountain bicycles cause less erosion than other activities, including hiking and horseback riding. See Jeffrey L. Marion, *Assessing and Understanding Trail Degradation: Results from Big South Fork National River and Recreational Areas*, United States Department of Interior (2006) (finding that bicycle trails were the least eroded, narrowest, and least muddy of the trails studied, including hiking, equestrian, ATV, and mixed-use trails); Luke Chiu & Lorne Kriwoken, *Managing Recreational Mountain Biking in Wellington Park, Tasmania, Australia*, *Annals of Leisure Research*, Vol. 6, No. 4, 339-361 (2004) (finding no significant difference in the surface wear on a control plot by hikers and mountain bicyclers); and John Wilson & Joseph P. Seney, *Erosional Impacts of Hikers, Horses, Motorcycles and Off-Road Bicycles on Mountain Trails in Montana*, *Mountain Research and Development*, Vol. 14, No.1, 77-88 (1994) (finding no difference between the erosional impacts of hikers and mountain

bicyclers in a controlled study, and noting that horses cause the most erosion as does motorcycle riding on wet trails).

### **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. As such we appreciate the following statement from the 'Cibola National Forest, Draft Forest-wide Ecological and Socioeconomic Desired Conditions':

*We envision a landscape that is actively managed to develop and sustain healthy local economies. Fundamental to our local economies are ranching and other agriculture, forest products industries, extraction industries, and tourism. These activities entail stewardship and responsible planning , with proper attention to sustainable use and public health. Granted this approach, they are to be encouraged in forest management policy. Viable local economies are intimately linked to good forest management*

There are many examples where the development of mountain bike trail systems has led to significant economic development, for example:

- Mountain bikers contribute an estimated \$25 million to the Fruita, Colorado economy, approximately 15% of the annual budget for Mesa County<sup>1</sup>
- In 2010, mountain bike trails at Raystown Lake, Pennsylvania attracted more than 25,000 visitors, 2.5 times more than predicted. Visiting riders spent on average \$98 for a day visit, and \$227 for an overnight visit. Mountain bikers brought \$1.2 million in spending to the region<sup>2</sup>
- 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 million<sup>3</sup>

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

- Caliente, NV where we are working with the Bureau of Land Management (BLM - Caliente Field Office); Nevada State Parks (Kershaw Ryan State Park); 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 the USFS (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.

- Kanab, UT where we are working with the BLM (Kanab Field Office), the City of Kanab and Kane County Commission/Kane County Office of Tourism. We are working on a conceptual plan for 75-100 miles of trail in an area that already sees literally millions of visitors due to being a gateway town to Zion National Park.
- Cedar City, UT where we are again working with the BLM (Cedar City Field Office) on a 100 mile trail network. Construction has already begun on this system, which again is located in a gateway town for Zion National Park, and accessible from Interstate 15.

### **Our position on new and expanded Wilderness in Cibola National Forest**

IMBA members highly value land conservation, clean water and clean air. The vast majority of mountain bicyclists enjoy riding in natural areas on singletrack trails, away from roads and development. Our activity brings us closer to nature and fosters a desire for environmental protection. Backcountry travel by bicycle is demanding, yet highly rewarding, and cyclists wish to protect these experiences. Wilderness is not the only form of land protection: from Roadless Areas to a suite of Special Management Areas to National Monuments, there are many designations that can be used to protect special places. Many of these designations allow for bikes access, and IMBA frequently recommends employing these bike-friendly designations to achieve high value protections coupled with flexible and accessible management. The mountain biking community highly values lands that bear the qualities of wilderness as they present the sort of wildness that offers outstanding opportunities for enjoying and appreciating nature via the bicycle. These experiences should be reinforced and promoted for a wide variety of recreationists where they are compatible and manageable. We firmly contend that the science supports that landscapes with wilderness quality characteristics can support continued and managed mountain bike trail access while maintaining the characteristics of wilderness.

Wilderness suitability does not automatically justify or warrant a wilderness recommendation nor should it preclude current or future bicycle access. Bicycles and wild characteristics are not mutually exclusive. Thoughtful and active management can and should maintain the character and values of a landscapes for the long term. Having characteristics of wilderness suitability are not the only metric that should be accounted for in an inventory. Wild and remote areas are popular for long-distance backcountry bike trails, multi-day bike-packing tours, and other appropriate activities. While we understand that this procedure is simply an exercise to inventory wilderness character, if it is not carefully presented or other qualities and values fully accounted for, this type of process could lead to precluding appropriate activities such as mountain biking on the false premise that the two are incompatible. Careful consideration must be taken to weigh the value of a spectrum of uses with the wilderness characteristics identified. We recommend that the USFS balance any positive identification of suitability with a value assessment to identify what the pros and cons are to managing an area in any specific manner. At all opportunities, alternative protective forest planning prescriptions and administrative

designations that would achieve the same end result of protection and maintenance without unnecessarily curtailing appropriate and sustainable recreation opportunities yet to be fully realized, should be fully considered, reviewed, and pursued to avoid further restricting or confining public access. We, IMBA and the AMBA, offer our time and resources to help the USFS achieve balance and we look forward to working with you and others collaboratively on this planning process.

We understand that there are four existing Wilderness areas in the Cibola National Forest:

- Apache Kid Wilderness Area (Magdalena Ranger District) 44,626-acres
- Manzano Mountain Wilderness Area (Mountainair Ranger District) 36,875-acres
- Sandia Mountain Wilderness Area (Sandia Ranger District) 37,200 acres
- Withington Wilderness Area (Magdalena Ranger District) 19,000 acres

Together the total acreage of federally designated Wilderness in Cibola National Forest is 137,701 acres, with the Cibola National Forest being 1,600,000 acres in total. Through your document titled "*Inventory and Evaluation Process of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System*", we understand that your work on this process has included an inventory of lands with Wilderness characteristics.

**Magdalena Ranger District (Bear and Magdalena Mountains area)** - we understand that the inventoried area here has resulted in identification of wilderness characteristics and suitability on multiple adjacent parcels around the current Withington Wilderness Area boundary; and on new parcels of significant acreage both to the north and south of the village of Magdalena. The village of Magdalena is currently transforming into a regional cultural center, and with many miles of existing recreational trails in the area the village stands to benefit from increased visitation. The topography, village structure and population in Magdalena is similar to that of Caliente, NV or Superior, AZ, where we are currently developing community based trail networks for both local residents and visitors. We would advocate and urge the USFS to balance the values and character of the area with no loss of existing mountain bike trail access in the area, and would request that the USFS engage in a public input process to gauge interest in developing additional mountain bike trail access in this region to strengthen the spectrum of opportunities and highlight the values of the area.

**Magdalena Ranger District (San Mateo Mountains area)** - along with the multiple smaller units adjacent to the Withington Wilderness Area found to have suitability (as mentioned above), we understand that the same characteristics exist to the south of the Withington Wilderness Area, making future potential contiguous Wilderness with the existing Apache Kid Wilderness Area possible. The vast scale of this much larger hypothetical Wilderness area would result in the elimination of east-west travel routes via mountain bike through the San Mateo Mountains, and as such we would advocate against any expanded Wilderness recommendation as it stands.

**Magdalena Ranger District (Datil Mountains area)** - as with the previous areas, the inventoried areas in this region are extensive and in places, contiguous which, if likely to lead to

wilderness-like management, would create significant impediments to mountain bike access. The Datil Mountains currently have extensive potential for opportunities for trail based recreation, and significant potential for expansion of mountain bike access. Therefore, while we recognize that the area may be suitable based on objective criteria, a subjective approach would likely suggest otherwise and we do not support a recommended Wilderness here in the current form. We are opposed to any loss of existing and future mountain bike access in this area.

***Sandia Ranger District*** - in the Sandia Ranger District, we advocate for no new or expanded recommended Wilderness acreage. While Wilderness characteristics may be present, this is an urban Ranger District and therefore is accessible to hundreds of thousands of residents in Albuquerque, who should be allowed to visit and recreate in their forest using various non-motorized methods, including on mountain bikes. Any expanded Wilderness in this district would lead to a reduction in such access and would fail to fully serve the diversity of residents and interests in the area. The existing Sandia Mountain Wilderness currently borders the city of Albuquerque and indeed some of the recommended expansions are proximal to the city. Mountain biking is a very popular activity in this area, with extensive trail systems in the region. We would, however, support other management practices and special management designations in this area in order to protect the natural resources and recreation facilities from the impacts of heavy use while providing the public opportunities for interpretive educational programs, healthy sustainable recreation and unstructured time spent in nature. We are opposed to any loss of current or future mountain bike access in this area as it is an essential component of the full spectrum of recreation opportunities available.

***Mountainair Ranger District*** - we understand that Wilderness character has been identified here as well and includes the potential, based on the inventory criteria, for expansion on the eastern side of the existing Manzano Mountain Wilderness, plus several smaller parcels on the western side; and an area in the southeast of the district, west of Corona, NM. We advocate for no loss of mountain bike trail access in these areas and would seek to work with the USFS to help maintain the wild character identified in the area.

***Mount Taylor Ranger District (Mount Taylor area)*** - in this area we would advocate for no loss of existing mountain bike access, as the area could be an optimal location for long distance backcountry riding.

***Mount Taylor Ranger District (Zuni Mountains area)*** - the Zuni Mountains, to the southeast of Gallup, NM currently offer extensive mountain bike access, and significant potential for expanded access. We understand that there is also a separate trail planning process in progress in this area, which we wish to engage in. We do not support expanded Wilderness in the Zuni Mountain area. We see that existing and potential new mountain bike access offers an opportunity for regional economic development, especially due to the proximity to Interstate 40, and the region currently being renowned as a mountain bike destination. Anecdotally, we have observed another trail system in this area (High Desert Trails in Gallup, NM) as serving native American and hispanic populations, who are typically underrepresented in mountain biking as a

whole, and as such we wish to see improved and additional access, rather than reduced access via Wilderness designation.

Ms. Kohrman, in conclusion - IMBA supports the protection of public land for this and future generations. We see that providing sustainable mountain bike trail access will create future stewards of our public lands, through encouraging recreation, exploration, learning and appreciation of our natural resources. Mountain biking is a growing sport, compelling to all ages and abilities, especially with children and youth, and as such we should employ land management practices which encourage this activity. We appreciate the work that you and your staff are putting into this Forest Plan Revision, and we wish to remain engaged in the process.

Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Patrick Kell".

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