



April 20, 2020

Nez Perce-Clearwater Forest NFs Plan Revision, Project 44089
Zachary Peterson, Forest Planner
USDA Forest Service – Nez Perce-Clearwater
903 3rd Street
Kamiah, ID 83536
Via email to: sm.fs.fpr_npclw@usda.gov

Kurt Refsnider, Ph.D.
Bikepacking Roots
101 W Goodwin St #3849
Prescott, AZ 86302
908-912-4408

RE: Comment on the Forest Plan Revision pertaining to maintaining mountain bike access on the Idaho Centennial Trail in the Hoodoo Recommended Wilderness Area

Dear Mr. Peterson:

Bikepacking Roots is hereby submitting comments on the forest plan revision draft environmental impact statement (DEIS), specifically related to maintaining continued access for mountain bikes through critical connectivity along the Idaho Centennial Trail (ICT; the Divide Trail) in the Hoodoo Recommended Wilderness Area (RWA) between Hoodoo Pass and the vicinity of the Old Kelly Creek Work Center. Overall, we are supportive of the RWA but have two requests pertaining to to the aforementioned mountain bike access.

Bikepacking Roots is a 501(c)(3) non-profit organization that supports the rapidly growing bikepacking community and the conservation of the landscapes through which we ride. Bikepacking Roots represents more than 5,000 members who seek opportunities to travel and camp by bicycle in wild places.

Long-distance, remote, and mountainous singletrack routes open to mountain bikes, like the ICT, are a rarity in the United States. The section of the ICT that traverses the Hoodoo RWA (and the Hanson Ridge Bypass that uses Trails 738, 503, and 493) is a particularly stunning segment of near-alpine topography, incredible scenery, lakes, no motorized use, and countless drainages that effectively separate one user from the next. Despite the rugged nature of the trail, these characteristics are exactly what draw backcountry mountain bikers and bikepackers to this section of the ICT.

Mountain bikes are a recognized existing use of the ICT within the Hoodoo RWA boundaries (DEIS Appendix E-78) The mountain bikers and bikepackers that ride the section of the ICT that is within the Hoodoo RWA boundaries are adventurers. These sorts of riders, based on our extensive surveying of the community, seek backcountry experiences, inspiring landscapes, solitude, and travel through remote areas. These cyclists also identify that mineral extraction infrastructure, traffic from motorized users, noise from motorized development, livestock grazing, and noise and traffic from timber harvesting operations all detract from the desired backcountry. In short, backcountry mountain bikers generally are seeking the exact same experience as backpackers, equestrians, and sightseers all identified on E-78 as primary existing users of the Hoodoo RWA.

Mountain biking, and as such, bikepacking, are quiet, human-powered means of low-impact recreation non-motorized recreation. Continued use of the ICT by mountain bikes and bikepackers will in no way pose a threat to the Wilderness character of the Hoodoo RWA as described in Appendix E of the DEIS. Trail use is sufficiently light that no conflict between any user groups is mentioned within Appendix E.

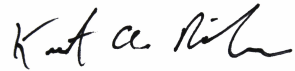
We are supportive overall of the Hoodoo RWA as outlined in the DEIS, but we request that the following requests be addressed:

(1) Mountain bike access be allowed to continue within the Hoodoo RWA on the ICT and the Hanson Ridge Bypass. Based on the the management of RWAs outlined in FSH 1909.12 74.1, existing uses can be permitted in new RWAs “if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation.” And this is most certainly the case for the established mountain bike use within Hoodoo RWA. The similarities between the experiences sought by bikepackers and backpackers alike, in particular, would make the closure of this RWA to mountain bikes particularly unjustified.

(2) A narrow non-RWA corridor be established along the ICT and the Hanson Ridge Bypass to preserve critical continuity for bikepackers riding the ICT. This would in no way impact the Wilderness potential for the Hoodoo RWA, and it would more concretely recognize the established mountain bike use on this section of trail. It is worth noting that precedent exists all across the West for creating corridors to maintain pre-existing access, both motorized and non-motorized, through and between Wilderness areas, Wilderness Study Areas, and RWAs. Examples include several of the 4x4 roads that traverse Utah’s Grand Staircase-Escalante National Monument for tens of miles and an electrical line corridor with a congruent recreation trail between Arizona’s Red Rock-Secret Canyon and Sycamore Canyon Wilderness areas. And even within the Hoodoo RWA, this DEIS includes a cherry stem for preserving motorized access to Fish Lake, nearly cutting across the entire width of the RWA. The rationale for preserving this motorized access, as described on page E-78, is that “trying to establish the long-established motorized travel to Fish Lake would present a management challenge.” Our point here is that narrow corridors through RWAs, and even Wilderness areas, to allow pre-existing access have both precedent and merit.

We look forward to working with the Forest on behalf of bikepackers as the Forest continues through the ongoing plan revision process.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Refsnider". The signature is written in a cursive style with a prominent initial "K".

Kurt Refsnider, Ph.D.
Executive Director
Bikepacking Roots