



PO Box 20280
Boulder, CO 80308
Office: 303.545.9011
Fax: 303.545.9026
www.IMBA.com

3/21/24

Comments emailed and electronically submitted via comment portal at:

Lolo National Forest
Attn: File code # 1920
24 Fort Missoula Road
Missoula, MT 59804

Re: Scoping for Lolo NF Forest Plan # 1920

The International Mountain Bicycling Association (IMBA) provides the following scoping comments for the Lolo National Forest (NF) Forest Plan.

IMBA would like to thank the USFS and its staff in the Lolo NF for the work that has gone into the current proposal. We offer these comments in the spirit of constructive feedback and a collective desire for well managed public lands and world class, close-to-home trails. We believe the scoping period is an opportunity to ask questions and seek answers through the following steps of the NEPA process. Therefore, while we have concerns, our comments, recommendations, and questions posed below are in the spirit of posing ideas and seeking answers to them to ensure the process is well informed and outcome is manageable.

BACKGROUND

IMBA's interest in the Lolo NF goes back many years to our work in MT and Idaho. We have lost access to many hundreds of miles of cherished backcountry trails in Region 1 and these losses led to the creation of many organized mountain bike groups throughout MT and ID and the surrounding states. One such group is our partners at MTBMissoula. They have become a professionally led local trail advocacy group that has done great work to balance conservation and recreation in MT and our comments here are based on our collaboration with them and their local knowledge.

IMBA seeks to help create well designed trail systems across the U.S. including MT to negate the negative impacts of growing public demand and the unfortunate impacts from unmanaged recreation on trails that are not designed with environmental sustainability in mind. These can often lead to user conflicts and wildlife safety problems, poor user experiences, soil erosion and water quality issues and degradation of wild character. We believe our work to educate the public on the NEPA process and guide them through the steps followed by balanced advocacy and

experienced trail designs can not only protect the local environment and wildlife that reside there, but can help enhance agency management objectives while providing a world class recreational opportunity for the local community to enjoy.

GENERAL COMMENTS

In 2018, the BLM completed a collaborative effort to develop “**Guidelines for a Quality Trail Experience (GQTE)**”. The BLM guidelines aimed to help improve the design, construction, and management of mountain bike trails all across the country. This resource was developed in collaboration with IMBA. The USFS has utilized this resource as well and we would recommend that the Lolo NF review this valuable resource and apply the concepts broadly in the appropriate manner and within the context of the Forest Plan to the development of the Forest Plan revision. Throughout this GQTE document, numerous sections discuss the value of the landscape and the trail experiences it provides and in doing so go beyond just the features but include the location of the trail as an integral part in meeting the desired outcomes of the recreating public. The setting is important and settings are fostered in the Forest Plan. This is not just a BLM issue, this should also be a USFS goal. Those desired outcomes are a tangible set of experienced-based benefits that take in the total experience of the landscape setting, design, and management.

IMBA recommends that the USFS move away from what often appears to be an activity-based management approach and landscape decisions based on this narrow view and move more towards an experience/benefits-based model for managing recreational settings and opportunities. Simply stated, the former activity-based model is similar to setting a goal of ten trails and once ten trails are available the goal is considered accomplished. An experience/benefits-based model, on the other hand, looks more at whether the ten trails are providing the desired and intended experiential outcomes for the visitor and judges its success upon maximizing these attributes. The intended result is a collectively more satisfying experience and one that will yield greater sustainability. Sacrificing experiential elements of this model disrupts the formula such that it no longer functions as a whole and can’t deliver on the intended outcomes. Therefore, in the context of the Forest Plan, the Lolo should look beyond the existing uses and assess and audit the opportunities that exist or are lacking and establish land use allocations based on a set of desired and articulated goals for experiences and recreational benefits to the public. This is all to say that trail experiences are influenced by their surroundings, their settings, and their location as much as they are by their specific tread features and layout. **The Lolo forest plan sets the critical stage for future settings and therefore this broad view and goal setting should be a part of the analysis even if trail designations are not.**

Preliminary Issue #1: Ecosystem Integrity and Management

Terrestrial and aquatic ecosystem conditions (components such as composition, structure, function, connectivity) over time is linked to 2012 planning rule requirements for ecological integrity and plant and animal diversity.

Comment: We would like to highlight the positive interconnectedness of managed recreation (as opposed to unmanaged recreation) on meeting ecological goals, wildlife habitat objectives and landscape character retention. As population grows, there is a need to manage the number of people seeking to access public lands from community centers like Missoula and Kalispell—two of the fastest growing communities in MT. While all recreation has impacts on some level, we can all agree that unmanaged and unplanned recreation has far greater impacts than planned and managed. So we contend that in order to prevent degradation of forest lands and habitat, the Lolo needs to utilize this planning process to better identify how recreation should be better planned and provided for to ensure goals and objectives for ecological integrity are achieved. While trail designations are not a part of this process, the designation of landscapes via prescriptive allocations and administrative designations are and these serve to set the stage for the appropriate recreational projects in the future. We encourage the Lolo NF to consider the way in which recreation can help achieve the broader goals of forest management and if nothing else, consider how not linking the role of planned and managed recreation will negatively affect these goals in fast growing communities like those around the Lolo NF.

Preliminary Issue #2: Sustainable Recreation Opportunities
Opportunities (suitability) for mountain bikes or ebikes.

Comment: We wholeheartedly support the need for sustainable recreation opportunities. As stated above, our decades of experience advocating and building trails for managed recreation across the country and world has clearly indicated that managed recreation is far more sustainable than unmanaged use. Since the pandemic, people are moving to Montana's towns for the outdoor recreation opportunities they provide. These people will find ways to recreate and if not provided for in a purposeful manner, it will lead to greater resource impacts. While mountain biking, including the use of electric mountain bikes (eMTBs) continues to grow in popularity, IMBA and the organized mountain biking community like MTB Missoula generally provide multi-use trail planning for local communities and trails. These multi-use trail systems serve the broad range of trail users and place them on linear features that are constructed to standards and vetted through the NEPA process to avoid, minimize, and mitigate impacts to the extent possible. The MTB community is often criticized for the advocacy around trail development, but these trails follow the process and serve diverse visitors. The alternative is illegal trail development outside the environmental review process which would be far more impactful. Therefore we encourage the Lolo NF to fully consider the role of planned recreation in the forest plan and set aside forest lands for future semi-primitive and bike-friendly trail development. IMBA's *Trail Solutions* has literally written the books on trail planning, managing mountain bikes and how to manage for experience. Therefore our work meets those best practices. Our advocacy does not just pack in the most miles a landscape can hold, rather they take into careful account the topography, the local habitat and fauna, the soils and the regional offerings to create a trail system that serves the local needs while providing for a quality experience for all. Depending upon local agency manager desires and stipulations, the majority of IMBA's trail concept plans also involve trails that serve hikers and equestrians often leading to some trails only open for these other diverse uses.

However, to achieve these plan proposals, the USFS must set bike friendly prescriptions in the land and resource management plan like this Forest Plan revision otherwise, the mountain bike community will not be compelled to help build trails that are not within systems available to them. And frankly, there are simply few others in the broad recreation community experienced enough or involved in trail planning and building for diverse uses.

Preliminary Issue #4: Recommended Wilderness

Lolo NF Need For Change: “There is a need.....To provide management guidance for recommended wilderness that addresses changing recreation uses, trends, and demand for recreation special uses;”

Comment: The Lolo NF proposed action scoping letter states, “As part of the plan revision process, I am required [to] identify if there are lands that could be recommended to Congress for inclusion into the National Wilderness Preservation System.” We believe this is not accurately stated and could be misconstrued by the public. We believe it needs to be better clarified that the 2012 Planning Rule requires the Lolo NF only to inventory and identify and evaluate lands that contain the both the required Wilderness character and meet the size and other criteria that make them suitable for inclusion in the National Wilderness Preservation System (NWPS). But there is no requirement to recommend new Wilderness or to continue the current recommendations on the forest. The Lolo NF must only determine whether to recommend any such lands for wilderness designation after the required inventory and evaluation.

There are four steps in the Recommended Wilderness process: inventory, evaluation, analysis and decision. None of these require a recommendation if factors suggest that it’s not the best course of action. The requirement is only for an inventory of wilderness character and a presentation of the lands that meet the criteria for analysis and evaluation. Stating anything that suggests a requirement to recommend misleads the public into a false expectation for recommended wilderness that will lead to unnecessary objections and litigation. While IMBA does not outright oppose new Wilderness or Recommendations for new Wilderness—we in fact support numerous including those found in the Blackfoot Clearwater Stewardship Act proposal—we do recognize that these restrictive designations are not right for every landscape due to their overly restrictive requirements on forest management and recreational access like mountain biking. We believe that there are other more suitable designations that can serve to uphold and maintain the character and setting while allowing for more flexible management and access. One such designation is the Backcountry Management Area (BMA) designations made popular in Region 1 by the Custer Gallatin NF in 2022.

BMAs, according to the USFS, are primarily for semiprimitive recreation. Current recreation and access, including mechanized transport and motorized recreation on existing routes, is not restricted as a result of BMA designation. Recreation instead is managed for less development and less concentration of use but still provided for. With active management, these BMAs can preserve the existing wild character that makes them special. BMAs prevent the need to unnecessarily curtail appropriate use on the mere basis of overly strict management protocols set for in the Wilderness Act.

We encourage the USFS to consider BMAs as an effectively protective designations in areas with historical mountain bike use or in areas where future bike access could serve to meet an appropriate demand not provided for elsewhere or within a reasonable proximity to the area. BMAs have stood up to objections and have even been employed to replace former recommended wilderness. An example of this is the Lionhead Recommended Wilderness in the CGNF. The Lionhead was un-recommended and redesignated to become a BMA in 2022 primarily for the mountain bike trail access that successfully coexisted in the IRA with the wilderness character. Further proof that MTB access does not automatically erode Wilderness character.

TRAIL/LANDSCAPE SPECIFIC COMMENTS:

Trail or Landscape:

Heart Lake Loop, Stateline Trail

USFS Proposed Action:

Trails around Heart Lake to become Recommended Wilderness per 1986 proposal.

IMBA Recommendation:

We strongly oppose this action without a non-motorized travel corridor established on trails surrounding Heart Lake. We otherwise support the action to achieve large landscape conservation goals via the Great Burn Recommended Wilderness.

Rationale for “Why”

Existing and historical mountain bike access to the Heart Lake and the Stateline trail proves that mountain bike access does not degrade wilderness character and can be managed together in a complimentary manner. The fact that these characteristics coexist with long time mountain bike access should help the USFS argue that continue managed use is appropriate. Like Sheep Mtn or Mill Creek, these trails are one of the few historic high-alpine mountain bike rides on the Lolo NF. The recently released ROD from the Nez Perce-Clearwater NF recommends the Stateline Trail be managed to allow bike travel and

we support that decision and the reasons for it. Because a segment of the Stateline Trail is included in the route around Heart Lake, it is even more compelling for the Lolo NF to allow bikes on the Heart Lake trail network. While not necessarily required, practically speaking the USFS should seek where possible to integrate its management across forest boundaries to ensure effectiveness and aid public compliance.

Trail or Landscape:

Carlton Ridge to Mill Creek on Lolo Peak (Maps)

USFS Proposed Action:

Recommended Wilderness extends northward towards HWY 12 but not as far as these trails.

IMBA Recommendation:

We support the recommendations for the Lolo Creek Geographic Area.

Rationale for “Why”

The three-miles of trail to the Wilderness boundary on Carlton Ridge is excellent backcountry mountain biking close to Missoula’s urban area. There is no need to further restrict bike access on Lolo Peak and in the Bitterroot Range.

Trail or Landscape:

Cube Iron Roadless Complex (Maps)

USFS Proposed Action:

Manage as backcountry management area BMA designation

IMBA Recommendation:

We strongly support the recommended BMA designation in this area which will maintain primitive characteristics while allowing for bike access.

Rationale for “Why”

The trails surrounding Cube Iron Mountain are among the few backcountry rides on the Lolo NF with excellent views and lush old-growth forest. Backcountry management designation ensures opportunities for solitude and quiet recreation experiences.

Trail or Landscape:

The Landscape included in the BCSA (Blackfoot Clearwater Stewardship Act) ([Maps](#))

USFS Proposed Action:

Does not use the BCSA boundaries, uses the 1986 recommended Wilderness

IMBA Recommendation:

IMBA has long supported the BCSA as it was drafted via coalition we were involved with and submitted by Senator Tester for congressional action. This proposal struck a carefully crafted compromise that provides continued mountain bike access on Center Ridge and creates trail development potential into the Otatsy Lake Area. The Lolo should better integrate the forest plan proposal with the BCSA as a recognition of the importance of locally derived forest collaboratives that iron out compromises for controversial subjects like Wilderness and recreation. If the immense work that led to the BCSA is only then disregarded by the USFS during forest planning, these productive collaborative efforts will end leaving the FS to have to manage the controversy themselves in the planning process. This is not an efficient process. We urge the Lolo NF to better reflect the BCSA elements that took years to reach consensus on.

Rationale for “Why”

We have committed to being a supporting partner on this legislation—not so much for potential mountain biking opportunities—but for the greater conservation outcomes of the Blackfoot Clearwater watershed ecosystem.

Trail or Landscape:

Rock Creek ([Maps](#))

USFS Proposed Action:

Recommended Wilderness surrounding Quigg Peak to the west of Rock Creek.
Backcountry management proposed to the east of Rock Creek.

IMBA Recommendation:

We do not oppose additional Wilderness around Quigg Peak, though some less popular trails (Rach Creek) may be lost. We support the Backcountry management east of Rock Creek to retain access and to ensure a bike-travel connection between the Lolo, Bitterroot, and Beaverhead Deerlodge NFs

Rationale for “Why”

Trail 313 north of Skalkaho Pass is excellent riding. Stony Lake Trail (Tr 8002, Beaverhead Deerlodge NF) and Big Spring Creek (Tr 1269, Lolo NF) provide a great backcountry loop with Tr 313.

Trail or Landscape:

Greater Missoula: Rattlesnake, Deep Creek, Petty Mtn ([Maps](#))

USFS Proposed Action:

Create at least three opportunities to enhance trail connectivity to create loop rides.
Cooperate with Missoula Co. on restoration and recreation planning efforts in the Deep Creek area.

IMBA Recommendation:

We appreciate and support the progressive actions for the Greater Missoula Geo-Area as they are aimed at improving access and connectivity both to and within the forest. We continue to remain hopeful that the user-created trail system accessed via Dry Gulch Road will transfer to public ownership and offer additional trail-based recreation. User-created trails, for all their problems, are in fact, if nothing else, indications of demand. Planned and managed recreation is better than unplanned and unmanaged recreation.

Rationale for “Why”

Western MT has changed significantly since the 1986 forest plan adoption. The desired conditions and objectives speak to the population growth and increase in forest visitation. The Missoula Front Country project encompassing Deep Creek holds great potential to relieve some of the visitation pressure at existing trail networks and to serve the rapid population growth occurring west of Missoula.

Conclusion

IMBA looks forward to working with locals and the FS throughout this revision process. Thank you for considering our comments and recommendations. Please feel free to reach out to me if you have any questions.

Sincerely,



Aaron Clark
Government Affairs, Policy Manager
International Mountain Bicycling Association
Office: 303.545.9011
aaron.clark@imba.com