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Comments: July 5, 2016

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[www.evergreenMTB.org](http://www.evergreenMTB.org) Sustainable trails. rider powered.

RE: Comments on Proposed Revised Land Management Plan for the Colville National Forest and Draft Environmental Impact Statement. Submitted via email to: [colvilleplanrevision@fs.fed.us](mailto:colvilleplanrevision@fs.fed.us).

Dear Amy,

Thank you for the opportunity to provide comments on the draft Colville National Forest (Forest) Proposed Revised Land and Resource Management Plan (Plan) and Draft Environmental Impact Statement (DEIS). We have reviewed the Plan and DEIS in detail, and while we have several key recommendations and concerns, we are generally very pleased with preferred alternative P as a balanced solution for forest management and maintenance, habitat protection, and recreational opportunities. Thank you for your team's efforts in preparing the Plan.

Evergreen Mountain Bike Alliance (Evergreen MBA) is Washington's largest mountain bike organization with 3,030 members and over 20,000 social media followers and supporters statewide. We are dedicated to trail building and maintenance, as well as volunteerism, education, advocacy, and youth participation. As a trusted partner with public land managers across the state, Evergreen's volunteers contributed over 15,000 hours of volunteer trail maintenance labor last year, and we are committed and on track to deliver 18,000 volunteer hours in 2016. Created in 1989 as a grassroots solution to local trail networks closing to riders, Evergreen has grown to include 7 chapters and become the State's primary mountain bike trail building and maintenance agency as well as advocacy voice.

To inform our comments and ensure we are considerate of other organization's goals and wishes for the Forest, Evergreen staff completed both in-person visits and phone calls with numerous stakeholders. We met or spoke with Ferry and Stevens County Commissioners, the Tri-County Economic Development District, Conservation Northwest, Washington Wild, Washington Trails Association, Northeast WA Trail Blazers, 49 Degrees North, Backcountry Horsemen, International Mountain Bike Alliance, American Whitewater, Out There Monthly, US Forest Service staff, Ferry County ATV Club, and the Kettle Range Conservation Group, as well as several community members. While our comments do not represent any of these organizations, and while we weren't able to find common ground with all, our comments do reflect a sincere effort to address key issues raised and balance often opposing viewpoints regarding forest management practices.

We believe that Alternative P is a sound plan and support many aspects of the Preferred Alternative for its direction on forest and recreation management, including the opportunity for restoring and maintaining ecological resilience of forests, watersheds and habitats. The Plan Revision also has sound road density goals for watershed health and habitat connectivity/climate adaptation purposes, while maintaining access to important recreation infrastructure such as trails and campgrounds. Following are our concerns and recommended

changes to Alternative P, for your consideration before the final Plan is adopted.

Evergreen Mountain Bike Alliance is a 501(c)(3) nonprofit organization. Tax ID: 91-1553023.  
418 NE 72nd Street| Seattle WA 98115| 206.524.2900 | [www.evergreenMTB.org](http://www.evergreenMTB.org)

## Proposed Wilderness and Mountain Bike Access

### Proposed Wilderness Areas (PWAs)

Our members love our State's forests and mountains, and we deeply value back-country and high alpine riding experiences. Our community understands the need for, and supports protection of our treasured wild areas, and we have worked diligently with land agencies, recreation organizations, conservation groups, economic development districts and other stakeholders to find balanced solutions that promote habitat protection combined with recreational access for our fast growing sport. For example, Evergreen MBA worked collaboratively with wilderness advocates to develop and actively support land protection bills that also offered best possible options to preserve mountain bike access. These included the Alpine Lakes Wilderness Additions and Pratt and Middle Fork Snoqualmie Rivers Protection Act (H.R. 1769/S. 721) and the Wild Sky Wilderness Act (Consolidated Natural Resources Act of 2008, Public Law 110-129). We also supported development of the Wild Olympics, currently in Congressional review.

We feel strongly that this balance between Wilderness and access for mountain bikers can be achieved in the Colville National Forest as well, and have collaborated with several conservation organizations to identify these opportunities. As a result of our conversations, we support the following Recommended Wilderness Areas (PWA), as we have learned that these are of key interest among conservation groups and do not eliminate high quality mountain bike trails:

- \*Abercrombie Hooknose (with a boundary modification as detailed below and mapped in Appendix A.)
- \*Quartzite (as indicated in Alternative B)
- \*Hoodoo (as backcountry non-motorized, or as wilderness - as indicated in Alternative B)

Evergreen MBA does not support the Bald/Snow/White PWA, as this eliminates a unique high alpine riding resource as well as the opportunity for a contiguous Kettle Crest riding experience. The Barnaby Butte and Edd's Mountain trails also connect to Thirteen Mile Trail, offering an epic long distance riding opportunity close to the communities of Republic and Kettle Falls.

We also do not support inclusion of the Abercrombie Peak and Silver Creek North Fork loop trail in the Abercrombie/Hooknose PWA. Mountain bike access to these trails should not be lost. We recommend the following:

\*Change the Bald/Snow/White PWA to Special Interest Area (SIA). (As indicated in Alternative O). This facilitates a single consistent management designation for all of the Crest, and may simplify management of the Crest as a coherent recreational and geological resource.

\*Change Hoodoo from SIA to backcountry non-motorized, or to PWA, to ensure that the SIA for the Crest continues to be within its maximum limit of 100,000 acres. While we could support a PWA for this area, this section of the Forest tends to be used by less experienced and younger riders, and is therefore highly valued for family excursions. In addition, the trail also needs significant maintenance for downed trees each year, which would be hard to accomplish if Hoodoo did become Wilderness in the future.

\*Remove the Abercrombie Peak and Silver Creek North Fork trails from the Abercrombie Hooknose PWA. As the second highest peak in eastern Washington, the Abercrombie Peak and Silver Creek loop ride is unlike any other in the State. A road leads to within 3.4 miles of Abercrombie Peak, so our request does not impact much of the IRA, and can be easily accommodated by eliminating the Abercrombie Peak/Silver Creek loop from the PWA, or by creating a protected trail corridor along the trail with at least a 300ft buffer (combined with a provision that the

trail corridor will be protected if future trail realignments are required). Although fairly narrow, this revision request still maintains a contiguous wilderness corridor east of Abercrombie Peak.

#### Mountain Bike Access

According to the DEIS, Alternative P could potentially eliminate an estimated 78 miles of non-motorized currently accessible to mountain bike use due to future Congressional Wilderness designation. The above requested changes to the PWAs would reduce potential future trail miles lost to 27.23 miles. This represents a loss of 31.98 miles in the Abercrombie Hooknose and Bald/Snow PWAs, and an increase of 4.75 miles of trail in the potential Hoodoo PWA, for a proposed revised net loss of 50.77 miles of trail currently accessible to mountain bikers. The below table detail trails eliminated from, and added to, PWA's as a result of our requested changes. Our recommended revised management designations are mapped in Appendix A: "Evergreen MBA Recommended Wilderness Map Revisions for Alternative P."

#### Trail Name Trail

#Miles Reason to Exclude Trail from PWA Recommended New Designation

Abercrombie Peak 1173.2 Rare high alpine (7,308') access for mountain bikers, which cannot be found elsewhere in the state. Breathtaking panoramic views of Pend Oreille and Columbia River valleys as well as Kettle Crest. Ability to connect to Silver Creek North Fork trail for a unique loop with a long descent that is attractive to riders and tour guides as a remarkable riding experience. Backcountry, Non- Motorized

Silver Creek, North Fork 1193.9 This is a great mountain biking trail with tremendous views from the top and connects to Abercrombie Peak Trail to create an amazing shuttle-able loop. Loop trails are limited in the Forest, yet make for a more complete riding experience and reduce trail user conflict as riders complete loops in a favored direction. Silver Creek North Fork is primarily used as a 7 mile descending trail, a length rarely found in other WA riding destinations. Backcountry, non- Motorized

Kettle Crest - South 139.581 This trail climbs from 5450 ft Sherman Pass to the 6750 ft level of White Mountain and ends at the 5200 ft level of Onion Ridge. The trail offers a contiguous riding experience to all of the Crest, which would be lost to potential wilderness, along with the high alpine experience and views of the White Mountain Fire complex to the west and Lake Roosevelt to the east. SIA

Edds Mt 35.6 Top is a nunatak - exposed rock. Difficult trail, but connects to Thirteen Mile for epic long distance/overnight loop experience. SIA

Barnaby Butte Trail 76.9 A trail sought after by mountain bikers because of its rugged, primitive experience. It can be included in a loop with Kettle Crest Trail or Thirteen Mile Trail #23 (via a Hall Creek Rd.)

Excluded from PWA because it's part of the Bald/Snow IRA. Evergreen could support a PWA for this trails if this could be accomplished without affecting access to Trails #13 and 3, and as long as a connection to Thirteen Mile trail is maintained. SIA

Barnaby Butte Trail 702.8 A trail sought after by mountain bikers because of its rugged, primitive experience. Excluded from PWA because it's part of Bald/Snow IRA. Evergreen could support a PWA for this trails if this could be accomplished without affecting access to Trails #13 and 3, and as long as a connection to Thirteen Mile trail is maintained. SIA

31.98 Total Miles Eliminated in Evergreen's recommended changes to PWAs in Alt P.

#### Trail Name Trail

#Miles Reason to Include in PWA Recommended New Designation

Trout Lake Trail 174.75 Used by family and beginner mountain bikers. We prefer this to be included as backcountry non-motorized, but are open to supporting it as PWA, to make up for lost PWA at Bald/Snow. However, PWA could eliminate one of the area's only beginner & family riding areas in the future. PWA would also complicate the typically high annual maintenance needs for this trail, if chain saws would no longer be allowed in the future. Backcountry- Non- Motorized, or PWA

4.75 Total trail miles added in Evergreen's recommended new PWAs additions to Alt P.

27.23 EVERGREEN RECOMMENDED NET-TRAIL MILES LOST TO PWA

55.77 TOTAL TRAIL MILES LOST TO PWA IN EVERGREEN RECOMMENDATIONS (78-27.23)

#### Pacific Northwest Trail

Our access concerns and above recommendations for changes to the PWAs are partially based on the National Scenic Trails Act, which states: "National scenic trails, established as provided in section 5 of this Act, which will be extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass."

Inclusion of portions of the PNT in the PWA would not provide for maximum outdoor recreation, as per the Act, and would change the trail's standard. Long distance resources the likes of the PNT are rare for mountain bikers, and we strongly support any and all efforts to keep access to this trail open to non-motorized mechanized use to create a unique resource for riders nationwide to explore.

We appreciate the inclusion of language on the PNT regarding the identification of trail routes where none exist, and to move the trail off its existing road alignments. We also appreciate the objective to relocate 10 to 15 percent of the PNT's trail miles currently located on roads into a non-motorized trail setting within 15 years of plan implementation. However, we would like to see the objective to relocate 10 to 15 percent of the PNT's trail miles increased to at least 30 percent within 15 years. As we understand it, that would mean rerouting 1 to 2 miles per year for the 50 or so miles of trail on the Colville that travel on roadbed, which seems reasonable.

#### Non-conforming use in PWA

Mountain bike use in the recommended wilderness areas does not degrade the wilderness character of those areas, nor does it degrade the trail class on which the activity occurs. The nonconforming use existed prior to these areas being designated as recommended wilderness. Mountain bikers have been riding these areas because of their wilderness character and the difficulty in finding any similar experiences elsewhere in WA State. Mountain biking has had no impact on the wilderness character of the areas, as evidenced by their designation as PWA's.

The trail classes in these areas vary from minimally developed to developed. The mountain bikers that travel to the Forest value those trail classes and seek them out specifically. They travel from as far away Calgary, AB-Canada and Boise, Idaho. Evergreen is committed to help maintain trail as needed to upkeep wilderness quality, and we stand ready to inform our members of the need to tread lightly, help volunteer to maintain trails and improve habitat, and to be respectful to other trail users to alleviate concerns related to this issue.

We will also continue to service trails as part of our Backcountry Maintenance grant, with hundreds of volunteer hours, many of which delivered as part of our annual KettleFest event at Sherman Pass. We anticipate to have at least 40 volunteers during this year's Fest, July 13-17, 2016.

Due to the remote location and challenging terrain of many of the mountain bike trails, ridership will continue to stay low, and impacts, if any, are manageable. For these reasons, we request that the language in the Plan and in the Management Area Overview tables is strengthened to: "Mechanized uses will be allowed for all current trails open to mountain biking, until Congress takes action."

#### Proposed Wilderness Management

We strongly support the Forest Service's plan to allow all existing non-motorized trail use in PWAs until these areas are Congressionally designated as Wilderness. While there is no precedent for this in Region 6, we commend the Forest Service for including this management designation to maintain all current uses in alternative P. We understand concerns expressed from conservation organizations about mechanized use potentially affecting wilderness quality. Several studies have, however, confirmed that mountain bike use does not negatively affect habitat or trail quality, and we encourage the Forest Service to not succumb to pressures to

close areas to mechanized use once designated PWA.<sup>2</sup>

We commend the Forest Service for taking initiative to allow mechanized use in PWAs. By doing so, the Forest Service facilitates a continued collaborative approach between mountain bike and conservation groups in Washington. We are committed to working with conservation groups on permanent land protection efforts for multiple areas of the Forest. There is, as far as we understand, only one precedent for this approach, in Region 1, but implementation has proven to be challenging and unclear. We encourage Forest Service staff to clearly outline this permission in the DEIS and Final Revision Plan, in order to facilitate consistent implementation across all Districts and avoid confusion about where mountain biking is allowed.

#### Special Interest Area

The SIA is a good solution to preserve mountain bike and other recreational access in much of the Kettle Crest. We generally support the SIA, as it serves as a creative solution to local desires to maintain non-motorized recreational access to the Kettle Crest and preserve habitat. We recommend that the SIA management direction is further clarified to be restricted to non-motorized, human, and equestrian-powered trail use, both for winter and summer recreation.

We understand that permanent long term protection for the Kettle Crest and other areas of the Forest is beyond the purview of the Forest Service. However, Evergreen MBA believes that the Kettle Crest is deserving of a more lasting and permanent protection for both recreation and wildlife, and we will continue to collaborate on long-term protection opportunities that are just shy of wilderness, but ensure permanent protection of the unique values of the Crest.

We recommend the management designations listed in the recreation section of the Seven Sisters Management Plan of British Columbia<sup>3</sup> as a good guideline for writing District-specific SIA management and maintenance objectives and strategies related to mountain biking and other recreational uses in the Forest. It is of great importance to the future success of the SIA that management objectives for each use are clearly outlined, and address both winter and summer conditions.

As a long term goal to develop and manage a successful SIA, we encourage the Forest Service to look into options for new loop trails near the communities of Republic and Kettle Falls. In our visits with local riders, we learned that there's a great need for more riding trails that can be easily accessed from towns, and do not require multi-hour riding commitments. Such trails cater instead to tourists and newer, younger riders, for a healthy after-school or after-work activity.

#### Other Considerations

Evergreen is not an expert authority on many aspects of the plan, but we wanted to express the following considerations for final Plan adoption:

\*Online Open House. We would like to express our appreciation for the Online Open House as an informational tool to review the plan and inform our comments. The online resources provided our membership the opportunity to research and learn more about the Forest and the Plan, and provide informed input about non-motorized trails and mountain bike access concerns. The Online Open House, combined with the series of public meetings, showed sincere efforts by the Forest Service to engage the public and provide ample opportunity for plan review and comments.

\*Motorized use and access. We are aware of strong local community and stakeholder interest in motorized recreation, and its importance as an economic driver - both winter and summer - for towns surrounding the Forest, particularly Republic, Kettle Falls, Lone, and Metaline Falls. The current plan caters to this user group with a 400% increase in Backcountry Motorized Management (BCM) acres.

Trends nationwide show a decrease in motorized sports, while non-motorized recreation segments are growing at a rapid pace. According to the 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan<sup>4</sup>:

\*51% of Washington residents participate in "Hiking - Trails"

\*24.4% of Washington residents participate in "Bicycle Riding - Trails"

\*2.7% of Washington residents participate in "Off-roading-Motorcycle - Trails"

\*5.2% of Washington residents participate in "Off-roading - ATV/Dune Buggy - Trails"

\*3.9% of Washington residents participate in "Horseback riding - Trails"

Additionally, the Colville National Forest's 2009 National Visitor Use Monitoring (NVUM) report states that "viewing natural features," "hiking/walking" and "relaxing" are the top three recreational activities on the forest.<sup>5</sup> Yet, the plan seems to favor increase in motorized recreation over increases in non-motorized uses.

While we don't have specific recommendations or changes to motorized use, we ask that increases in non-motorized trail use are given priority in future Forest management. We also ask that the Forest Service recognizes and carefully considers the increased trail maintenance needs and cost resulting from the increase in motorized acreage. Furthermore, we would like to see increased clarification on winter motorized use, and confirmation that the Kettle Crest SIA continues to be non-motorized during winter months.

\*Riparian Area Restoration: We fully support the identified need to relocate some trails and dispersed camping locations due to riparian habitat restoration. We stand ready to assist the Forest Service with volunteer trail and campsite relocation needs to ensure high quality riparian areas and restoration needs, as long as long-term trail access is not affected, and trail or camp site relocations are completed before any non-motorized trails are closed.

\*Wild and Scenic Rivers: We would like to express support for potential Wild and Scenic River designation for Sullivan Creek. Sullivan Creek flows through a scenic river canyon and with the soon-to-be-removed Millpond Dam, Sullivan Creek has tremendous recreation value for paddlers, in a spectacular and remote setting that is known to attract paddlers from throughout the region.

There has been a genuine effort by the Forest Service to address mountain bike access issues we have raised in our communication to previous versions of the Management Plan, and we greatly appreciate the concerted effort by Colville National Forest Service staff to consider current and future mountain bike potential for the Forest. With the recommended changes highlighted in this letter, we fully endorse and support the modified version of Alternative P.

Sincerely,

Yvonne Kraus Executive Director

1 Total length of Kettle Crest South is 13.38 miles. The first 3.8 miles from Sherman Pass is included in the SIA and therefore not included in the mileage total. The referenced 9.58 miles represent the portion of this trail that's included in the PWA could be lost to mountain bikers, upon Congressional Wilderness designation.

2 Gary Sprung: A Summary of Scientific Studies that Compare Mountain Biking to other Forms of Trail Travel. This resource page on the International Mountain Bicycling Association website provides a summary of multiple studies which measured trail and wildlife impact of mountain biking, when compared to hiking and horseback riding. Most studies conclude no significant difference between hikers and bikers.

<https://www.imba.com/resources/research/trail-science/natural-resource-impacts-mountain-biking>

Additional study results and research confirming no-to minimal impact, in normal conditions, can be found on IMBA's website:

\*<https://www.imba.com/resources/research/trail-science/environmental-impacts-mountain-biking-science-review-and-best-practices>

\*<https://www.imba.com/environmental-impacts-new-school-trails>

\*<https://www.imba.com/resources/research/environmental-impacts>

3 Management Plan for Seven Sisters Park and Protected Area, February 2003 Ministry of Water, Land and Air Protection Environmental Stewardship Division Seven Sisters Park and Protected Area M Prepared by Environmental Stewardship Division Planning Section Skeena Region Smithers, BC. Page 53.  
[http://www.env.gov.bc.ca/bcparks/explore/parkpgs/seven\\_sis/](http://www.env.gov.bc.ca/bcparks/explore/parkpgs/seven_sis/).

4 2013 Washington State Statewide Comprehensive Outdoor Recreation Plan. Pgs. 74-75

5 U.S. Forest Service. 2009 Visitor Use Report, Colville NF, National Visitor Use Monitoring Data Collect FY 2009.