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First name: Terry
Last name: Palmeri
Organization: Southern Off-Road Bicycle Association/International Bicycling Association
Title: Executive Director SORBA
Comments: Attached is the objection submitted by the Southern Off-Road Bicycle Association and International Mountain Bicycling Association.

Ken Arney, Reviewing Officer

Regional Forester

USDA Forest Service, Southern Region

James Melonas, Responsible Official

Forest Supervisor

National Forests in North Carolina

Attn: Objection Coordinator

Nantahala and Pisgah National Forests

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Submitted electronically via CARA Online Portal:

https://cara.ecosystem-management.org/Public/CommentInput?Project=43545

March 21, 2020

OBJECTOR INFORMATION Pursuant to 36 C.F.R. [sect] 219.54 (c)(3) Terry Palmeri, Executive Director of the Southern Off Road Bicycling Association is designated as the lead objector. If Terry is unable to perform her duties as lead objector, Julie White of the Southern Off-Road Bicycling Association will act as lead objector.

Lead Objector

/s/ Terry Palmeri

Terry Palmeri

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Secondary Objector

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Notice of Objection

The Southern Off-Road Bicycle Association(SORBA) and the International Mountain Bicycling Association(IMBA) filed an objection to the Final Land Management Plan for the Nantahala and Pisgah National Forests (the Final Plan) under the process identified in 36 CFR [sect] 219 Subpart B. The Draft Record of Decision (ROD) for the Final Environmental Impact Statement (FEIS) and Final Plan was issued on January 21, 2022. The legal notice of the ROD, FEIS and Final Plan was published in the Nantahala and Pisgah National Forests newspaper of record, The Asheville Citizen Times, on January 21, 2022; therefore, this objection is timely.

Statement of the issues and/or parts of the plan revision to which this objection applies:

SORBA and IMBA provided comments to the draft forest plan(comment letter dated June 20, 2020) which stated they were unsatisfied with the proposed Forest Plan's recommendation that prematurely restricts mountain biking to designated trails without an adequate trail system in place or an interim policy to ensure continued access opportunities. Currently, legal riding occurs on non-system trails, and this change will prohibit this access which will fundamentally reduce trail access for mountain bikers. They support a designated trail system as a goal within the span of the plan but stress the need to address the lack of riding opportunities throughout the forest first before any new restrictions are enacted.

This objection asks for clarification of language in the final plan regarding the timing of restricting mountain bike use to trails designated for that purpose. There is a lack of clarity of the timing due to seemingly conflicting language between the plan and the FEIS.

The draft plan included the Standard REC-S-11 (p.123)

Equestrian (horse, stock, pack, and saddle) and bicycle use is only allowed on system trails designated for those uses, and on open or gated system roads; unless the road is closed to those uses by Forest Supervisor order. Equestrian use is allowed for big game retrieval in hunting seasons identified by the State. Footnote 21 Standard

REC-S-11 will be implemented forestwide through a Forest Supervisor order after Objective REC-O- 07(a) has been achieved.

Objective REC- 0-07(a) reads: (p.122)

Tier 1: Within five years, begin collaborative trail planning to address equestrian and/or bicycle trail supply/demand issues in Bald Mountains, Black Mountains, Eastern Escarpment, and Highland Domes Geographic Areas (footnote 20)

Footnote 20: Standard REC-S-11 will be implemented forestwide through a Forest Supervisor order after Objective REC-O- 07(a) has been achieved

Objective REC 0-07(a) as it reads would allow closure of trails at the beginning of the trail planning process. Discussions with forest service personnel and portions of the FEIS indicate that the timing of the closure order was not intended to be at the beginning of this process but rather as progress had been made in meeting supply and demand issues.

Notations from the FEIS supporting the above statement

1. Chapter 3: Resources: Social Environment: Recreation (3- 464 and 3-465)

All together, these adjusted plan components require implementation of contemporary trail design principles, minimal resource impacts or user conflicts, and full consideration of the three aspects of sustainable recreation (ecological, social, and economic). This set of directions is more explicit than the other alternatives in that there are some known locations where the trail system does not meet the demand and takes steps to address the issue collaboratively. By clarifying that these supply and demand issues will be addressed prior to completing a closure order to restrict equestrian and bicycle use to system trails, this alternative clarifies that restrictions to the trail system will not immediately begin with the signing of the plan. This will provide an opportunity to make needed adjustments to the trail system while also expressing the Forest[rsquo]s commitment to addressing the proliferation of unauthorized trails over the long term.

2. Response to Public Comment (Appendix A p. 103 - 104)

Comment: Commenters do not support restricting cross-country travel by horse and mountain bike and the standard to restrict those uses to trails designated for their use until multi-use trail needs and opportunities are collaboratively evaluated and met first, noting crowding on some trails and including some support for establishing new trail segments. There was reference to the need for analysis of the impact of restricting all bike and horse use to the trail system. Conversely, some commenters want the proliferation of bike trails to be limited. Other commenters request the completion of trail inventories and evaluations using user data before cross country travel is restricted and still others want connectivity of trails to be maintained and increased.

Response: This issue was discussed extensively with members of the Stakeholders Forum, Nantahala-Pisgah Partnership, and other representatives from equestrian and mountain bike user-groups; including leadership of Back Country Horsemen of America (NC) and Southern Off- Road Bicycle Association. All parties agreed that keeping equestrian and mountain bike riders on NF system trails would help mitigate erosion, stream sedimentation, and habitat degradation. Although the need for this standard was acknowledged by these representatives, there were concerns that immediate implementation of the standard without first addressing trail supply/demand issues in certain areas would unfairly penalize users of unauthorized (non-system) trails. To address these concerns, an objective has been added to the Dispersed Recreation section of the plan to require collaborative trail planning to address equestrian and mountain bike trail supply/demand issues in certain Geographic Areas where public comment indicated the need for additional trail miles. An associated set of

Geographic Area Goals has also been added. Implementation of the standard restricting horse and bicycle use to designated trails will then be deferred until trail objectives have been accomplished.

Statement explaining the objection and suggesting how the proposed plan decision may be improved

We would like clarification from the Forest Service about their intent and would like the language in the plan to be changed to reflect the intent noted in the FEIS. In addition to the language more clearly defining the timing of any closure order we would like to see the reference to trail objections seen in the FEIS to be more clearly reflected in plan language.

We suggest the following language:

1.Original Language:

REC-O-07(a) Original Text p.122

Within five years, begin collaborative trail planning to address equestrian and/or bicycle trail supply/demand issues in Bald Mountains, Black Mountains, Eastern Escarpment, and Highland Domes Geographic Areas

Recommended Language

Within five years, begin collaborative trail planning to address equestrian and/or bicycle trail supply/demand issues to meet associated Goals in Bald Mountains, Black Mountains, Eastern Escarpment, and Highland Domes Geographic Areas

2. Footnote for REC-0-07(a) p. 122 Original text

Standard REC-S-11 will be implemented forestwide through a Forest Supervisor order after Objective REC-O-07(a) has been achieved

Recommended language

Standard REC-S-11 will be implemented forestwide through a Forest Supervisor order after collaborative trail planning identified in Objective REC-O 07(a) and associated Geographic Area Goals have been completed.

3. Associated Geographic Area Goals Original Text - example of this text which is similar in the 4 geographic areas noted (BAM-GLS-10 can be read on p.150 of the plan)

Address supply/demand issues for equestrian and/or bicycle trail opportunities within the geographic area through collaborative trail planning to identify appropriate trail mileage, new trail locations utilizing sustainable trail design principles, potential adoption of unauthorized routes, sources of construction funding, and long-term maintenance commitments by volunteer and/or partner organizations.

Recommended Language

Address supply/demand issues for equestrian and/or bicycle trail opportunities within the geographic area through collaborative trail planning to identify appropriate trail mileage, new trail locations utilizing sustainable trail design principles, potential adoption of unauthorized routes, sources of construction funding, and long-term maintenance commitments by volunteer and/or partner organizations. Area-specific metrics for achieving this Goal should be identified by Forest Service managers and partners during the collaborative planning for trails and trail complexes within this Geographic Area.Thank you for considering this language to clarify the intent of

statements made in the final plan. We appreciate the way that the Forest Service incorporated many of our suggestions relating to trails in the plan. We look forward to continuing our close collaboration with the Forest Service in implementing this plan.