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Comments: To The Nez Perce-Clearwater National Forest Plan Revision Team:

Thank you for the opportunity to participate in the planning conversation for the future of the Nez Perce-Clearwater National Forest. Through this planning process it has been inspiring to see hundreds of people come together to help shape the future of our public lands, and shows once again that these landscapes are essential to the communities they surround.

These comments are on behalf of MTB Missoula, a Missoula based group that represents hundreds of mountain bikers and trail enthusiasts across western Montana. We would like to take this opportunity to follow up with our comments regarding the administration of these wild lands, specifically the Hoodoo Roadless Area, the Great Burn, and the larger and landscape scale recreation opportunities that are uniquely presented by the Nez-Perce and Clearwater National Forests.

On behalf of the hundreds of public land advocates we represent, please consider the following perspectives as you continue to develop this Forest Plan Revision:

#### A Quick Word on Mountain Biking

Before we start, we would like to take a moment to thank the planning team for its astute and diligent understanding of what mountain biking on the Nez Perce-Clearwater National forest, and especially in the Hoodoo Roadless Area, means. In the draft planning document the team has demonstrated an uncommon understanding of the types and qualities of experience that mountain bikers seek on these landscapes.

In land management "mountain biking" is often mischaracterized as a specific, often thrill-seeking and adrenaline-fueled experience. In truth mountain biking is much like skiing: while an afternoon on nordic skis, or full day backcountry tour, or weekend of riding high-speed trams at a resort are all examples of skiing, of course, they represent fundamentally different experiences.

This planning team appears to appreciate this nuance, and regardless of the outcome of this process we would like to thank the individuals representing the agency for their openness to these distinctions.

#### Desired Outcomes

While MTB Missoula will make some specific suggestions for policy tools that assist in satisfying the needs and desires of the user group, we do not suggest that we are familiar with every tool or management designation available to the planning team. Because of that, we believe that it is worthwhile to describe the kinds of experiences and desired outcomes that are valued by our constituency in the event that they can be accommodated in a way that we have not thought of.

The Nez Perce-Clearwater National Forest provides numerous rare and valuable experiences for mountain bikers, and has for decades. And while mountain biking is a relatively diverse, catch-all term, two specific types of experiences are prominent on the landscape.

#### Backcountry Mountain Biking, especially above treeline

Some mountain bikers are drawn to remote, rugged, and challenging backcountry trail experiences on wild and raw landscapes. These are places where it is uncommon to see other trail users, and where riding requires a high level of physical fitness and technical skill - in many cases it involves pushing a bike instead of riding at all.

These backcountry rides are characterized by relatively modest speeds and distances, but tend to occupy a

whole day. These experiences are similar in pace and tone to a full-day backcountry ski tour, only in the summer. Point-to-point rides and loops are preferable to out-and-backs, and while riders prefer as much singletrack trail as possible, some road connections are acceptable.

Scenic views, dramatic landscapes, and wildlife are as much a part of the backcountry mountain bike experience as they are a backcountry hike.

Numerous trails along the Montana-Idaho border provide this kind of experience, and the Heart Lake Loop (which straddles the Lolo and Nez-Clear National Forests) is a prime example. Traditionally, riders park at the Heart Lake Trailhead and climb the dirt road to Hoodoo Pass. They then take the singletrack State Line Trail to its junction with the Heart Lake Trail and descend back to their cars.

This ride is sub-alpine, dramatic, and challenging, and opportunities such as this one are increasingly rare. In fact, portions of the State Line Trail (Tr. 738) that made this ride possible have been closed to mountain bikes in recent years.

MTB Missoula would like to see riding opportunities exemplified by the Heart Lake Loop (including that ride itself) accommodated in this Forest Plan.

#### Bikepacking

Bikepacking is the experience of backpacking, on a bicycle. These rides are long, usually (but not always) less technical, and require two or more days to complete. Like one-day backcountry rides, bikepacking trips require relatively high skill and physical fitness. Bikepacking trips hinge on the challenge as well as the majesty of the landscape; long, connected, and wild stretches of singletrack for bicycles is quite rare in the United States today.

While long singletrack experiences exist, the overwhelming majority are managed exclusively for foot traffic. Very long trails, such as the Pacific Crest, Continental Divide, and Appalachian trails cannot be completed by bicycle. Furthermore, large tracts of land such as the Bob Marshall Complex, Selway Bitterroot, and Frank Church Wildernesses are managed to provide remote hiking experiences without bicycles.

This northern portion of the State Line Trail presents an incredibly rare landscape-scale route through alpine and sub-alpine environments that can be managed for bicycle use. Occasional access points from both the Montana and Idaho sides of the landscape are preferable.

#### Specific Conditions

Maintain and/or restore mountain bike access for one-day backcountry riding loops. This can be accommodated by restoring bicycle access to miles 20-27 of the State Line Trail (From Hoodoo Pass to the Heart Lake Trail).

Maintain and restore bicycle access along the State Line Trail through the Nez Perce-Clearwater National Forest (except for where it passes through designated Wilderness).

Preserve and protect the wild nature of these backcountry landscapes.

#### Specific Suggestions

In general, MTB Missoula supports blending Wilderness management with continued mountain bike access through boundary adjustments to Recommended Wilderness, and increased ecological protections through non-Wilderness conservation management areas. Specifically, the needs and desires of the mountain bike community can be met in a way that accommodates natural resource concerns:

Numerous alternatives proposed by the planning team incorporate Wilderness Recommendation along the State Line Trail to preserve in perpetuity this landscape's wild character and habitat value. MTB Missoula humbly suggests that moving the boundary of the Recommended Wilderness Area to west of the State Line Trail by a buffer of 100 feet, the mountain bike community can enthusiastically support the majority of proposed wilderness on the forest.

Alternatively, a non-Wilderness backcountry management designation can satisfy the natural resource concerns on the landscape while maintaining sustainable human use. As described in the Forest Service Handbook, MA-9,

a semi-primative recreation management area, prohibits road building and resource extraction. This, in addition to Idaho and Federal Roadless Rules, will maintain the wild character of this landscape while allowing more diverse human engagement with the landscape than under Wilderness Recommendation.

#### Sustainability of Proposals

The Forest Service's 2012 Planning Rule instructs the agency to consider environmental, economic, and social sustainability in developing Forest Plans and revisions. MTB Missoula takes this opportunity to discuss the sustainability of our suggestions here.

#### Environmental Sustainability

The Nez Perce-Clearwater National Forest is home to some of the wildest and intact ecosystems left in the contiguous 48 states. This resource serves as a large and connected habitat for threatened and endangered species, a source of clean air and water for human communities, and a carbon sink in a warming climate. It deserves to be protected, which requires sustainable solutions and a broad base of support.

Bicycle advocates are able to advocate for a significant majority of the designated Wilderness proposed in even the most wilderness-heavy Alternatives, if minor spatial modifications are made to protect and restore historic mountain bike access as described in this letter.

The best available science is unclear on wildlife impacts due to mountain bike use. While a picture of habitat displacement due to recreation use is beginning to emerge in scientific literature, efforts to identify mountain bikes as a disproportionate culprit appear to be editorial in nature. Noteworthy trends include:

Numerous studies have identified flight distances of megafauna in various ecosystem types when confronted by recreation users. In some cases, the increased speed of mountain bikes increases the extent to which animals startle and flee; in other cases there appears to be little or no difference in how animals react between mountain bikes and hikers.

However, most studies have observed that where human use is consistent, predictable, and non-threatening, such as along trail corridors, animals quickly habituate to that use and are unbothered. Consensus appears to be growing that off-trail movement, such as with hunting and hiking, induce much more stress and pressure on wildlife. Likewise with dogs: both on and off-leash dogs have demonstrated outsize impact on wildlife.

Studies have indicated that wildlife are most sensitive to disturbance in the winter and spring, when habitat is compressed by deep snow and food resources are scarce. Mountain biking on these landscapes tends to take place in mid-summer and early fall, when food is abundant and habitat unencumbered by heavy snowpacks. Spatial adjustments proposed here can provide widespread support for the proposal with minimal changes to the amount of Wilderness recommendation.

#### Economic Sustainability

The mountain west is currently facing abrupt changes in the nature of economic development. Where decades ago agriculture, mining and timber production drove local economies, now outdoor recreation is at the heart of a burgeoning tourist economy. Today, outdoor recreation generates \$900 billion in consumer spending, and supports millions of jobs. In Idaho, that accounts for \$7.8 billion in spending, \$2.3 billion in wages and salaries, and generates \$447 million in state and local tax revenue. Outdoor recreation supports 78,000 jobs in Idaho alone.

Mountain biking is an important and growing subset of these figures, and plays a central role in the growing and evolving economy.

#### Social Sustainability

The forests of northern Idaho and western Montana provide large and connected landscapes of designated Wilderness. Millions of acres of designated Wilderness currently exist within a short drive of the Hoodoo Roadless area, while opportunities for diverse recreation types like mountain bike trails on this landscape are

incredibly rare.

Mountain bike access to trails like the State Line Trail exists in very few places, and as we look to the future public engagement with public land, flexibility in management

MTB Missoula is eager to participate in these conversations and continue to play an active role in a bright, sustainable future for our shared federal land.

Please do not hesitate to reach out with any questions or concerns,

Sincerely,

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