



*IMBA creates, enhances and  
preserves trail opportunities  
for mountain bikers worldwide.*



July 14, 2005

Congressman Greg Walden, Chair  
Congressman Tom Udall, Ranking Member  
House Resources Committee  
Subcommittee on Forests and Forest Health  
1337 Longworth House Office Building  
Washington, D.C. 20515

Dear Chair Walden and Ranking Member Udall:

On behalf of the International Mountain Bicycling Association (IMBA), thank you for the opportunity to testify regarding HR 233, the Northern California Coastal Wild Heritage Wilderness Act. As you know, Wilderness regulations prohibit bicycling. For this reason, bicyclists seek modifications of Wilderness proposals that will protect the land while continuing to allow this quiet, low-impact, muscle-powered recreation on existing trails.

IMBA was founded in 1988 and leads the national and worldwide mountain bicycling communities through a network of 32,000 individual members and more than 550 affiliated clubs. More than 39 million Americans participated in singletrack bicycling and 6.9 million were 'enthusiasts' of single-track bicycling in 2003, according to the Outdoor Industry Association. IMBA teaches sustainable trailbuilding techniques and has become a leader in trail design, construction, and maintenance; and encourages responsible riding, volunteer trailwork, and cooperation among trail user groups and land managers. IMBA members and affiliated clubs conduct close to 1,000,000 hours of trailwork annually and are some of the best assistants to federal, state, and local land managers.

IMBA believes that bicycle access is a legitimate, primitive form of recreation that should be allowed in new Wilderness areas designated by Congress. IMBA also believes it is reasonable that the management of access by bicycles to trails in these areas would be subject to ongoing administrative discretion of federal land managers. In the 1980's land managers became concerned about the growing popularity of bicycles on trails but chose an excessive solution - banning bikes. Now there is significant scientific evidence and a full generation of actual experience showing that the impacts of mountain bikes are comparable to other muscle-powered recreation allowed in Wilderness.

In other areas, bicycling tourism has proven to be a significant generator of local revenue. Places such as Moab, Utah; Mt. Hood, Oregon, and Asheville, North Carolina have all experienced the positive economic impact of mountain bike tourism. The beautiful, natural lands of northwestern California offer major opportunity for improving trails-based tourism, but that economic development could be hindered if backcountry trails are made off limits to bicycling.

Generally, the elimination of bicycling access would exacerbate a situation where much of California's public land is already closed to bicycling. Congress has designated almost 14 million acres of Wilderness in California, which is 14 percent of the area of the state. That is a higher amount and percentage than any other state except Alaska, and more than three times the amount of the next highest state, Washington. At stake in HR 233 are fabulous riding routes in the King Range National Conservation Area and the Red Bud and Judge Davis trails in Cache Creek in Napa and Lake counties, as well as numerous others. I have included a list of all trail opportunities that will be lost to bicycling if HR 233 is enacted, totaling more than 180 miles.

The Committee may hear that some of these trails are not open to mountain bikes, since they are not 'actively managed' for mountain bike use. This could not be farther from the truth. It is important to clarify the distinction between closed, open, and 'actively-managed.' While the terms closed and open seem self-evident, 'actively managed' simply means that the agency does not maintain the trails (clear deadfall, repair erosion, etc.) due to a lack of funding, time, or personnel. IMBA staff has consulted closely with Forest Service staff from offices of the Mendocino, Shasta-Trinity and Six Rivers national forests, and been informed there are no administrative orders closing trails to bicycling. Existing Forest Service rules establish that mountain bikes may access trails and roads within national forest units, unless the trail or road is closed to mountain bike access by a forest order or similar administrative action. This general policy of 'open unless closed' trails is effectively implemented by rules on forest development trails (36 CFR 261.55) and use of vehicles off national forest system roads (36 CFR 261.56). This management approach was not changed or impacted by the recent OHV rules issued by the Forest Service. Neither the proponents of HR 233 nor the Forest Service have provided a citation or copy of an official statute, regulation, forest order or other administrative action or decision closing the trails listed in IMBA's materials. IMBA believes these trails should be open to mountain bike access in order to preserve a range of cycling opportunities to the full spectrum of mountain bikers, beginner to expert.

IMBA supports new Wilderness designations where they don't close singletrack bicycling opportunities. Our members highly value land conservation, clean water, and clean air. IMBA supports protecting all of the lands in the proposal, but cannot endorse the legislation fully unless it is amended to preserve existing bicycling access. IMBA members, in particular mountain bike advocates in northern California, are deeply frustrated that legislative and environmental leaders have not seriously entertained negotiations or forged reasonable compromises that would preserve the wild lands of northern California while also maintaining the recreational enjoyment of many citizens and visitors.

A compromise could protect all the lands and could include some Wilderness designations, as well as other, diverse designations, while providing more benefits to stakeholders. Our repeated attempts to offer compromise have been rebuffed, and so we ask the committee to adequately protect existing bicycle access. To achieve this end, IMBA offers two recommendations to address the outstanding areas affected by this legislation:

- 1) Preserve existing trail access for bicycles by 'grandfathering' in existing uses; or

- 2) Utilize other federal land designations, corridors and boundary adjustments to maintain most existing access.

I have enclosed suggested revisions to HR 233 that would implement these recommendations.

Wilderness need not be the exclusive tool for preservation of important wild lands, particularly when it undercuts the complementary recreation values the Wilderness Act is supposed to protect and enhance. The current interpretation of the Wilderness Act prohibits mountain bicycling by treating it differently than other forms of muscle-powered recreation, such as hiking, horseback riding, skiing, and climbing. IMBA believes that Congress did not intend to ban bikes. Maintaining bicycle access in new Wilderness, or utilizing other federal land designations and implementing proactive management strategies will be more effective in balancing the preservation of wild lands and recreational access.

It does not make sense to me, nor seem fair, to ask bicyclists to relinquish their recreational pursuits when land protection is at stake, particularly when that pursuit does no more harm than other allowed uses. Why do we have to ask our 60 clubs, more than 6,000 members or the projected 2 million mountain bikers and visitors in California to forgo bicycling opportunities or, in some cases, trails they have ridden for years? Ultimately, blind adherence to Wilderness as the only means of protecting pristine areas creates a 'win-lose' situation for stakeholders who care about the preservation of land and water resources. Creative alternatives such as those I've outlined promise a 'win-win' for everyone.

Thank you for the opportunity to submit comments on this important legislation. IMBA looks forward to working with the committee and I welcome any questions.

Sincerely,

QuickTime™ and a  
TIFF (LZW) decompressor  
are needed to see this picture.

Jim Hasenauer

cc: Congressman Mike Thompson  
Senator Barbara Boxer  
Senator Dianne Feinstein  
Senator Larry Craig  
Senator Ron Wyden