



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



July 22, 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 again for the opportunity to submit testimony regarding HR 233, the Northern California Coastal Wild Heritage Wilderness Act.

Last week, Mr. Jim Hasenauer testified on behalf of IMBA and submitted documentation outlining the mountain bike trails impacted by HR 233. IMBA was required to submit those materials on July 12, 2005. Subsequent review of information not available at the time revealed the need for some technical and typographical changes to the trail list provided by IMBA. Consequently, IMBA requests that the previously provided trail list (dated March 2005) be withdrawn from the public record, and the enclosed list of trails (dated July 2005) be included. I hope this change will not be inconvenient for the committee.

In addition, IMBA would like to submit several letters from residents of the California First Congressional District, in addition to the more than 400 already provided. Please note that many of the 400 letters previously submitted included personal comments from interested residents. IMBA represents their concerns as well as those of numerous other residents and visitors of northern California's beautiful forests.

Finally, and perhaps most importantly, IMBA would like to acknowledge the work done by Congressman Mike Thompson to accommodate some mountain bike trails in HR 233. To date, Mr. Thompson and IMBA have agreed to changes that preserve access for mountain bikes to several areas including Underwood, Elkhorn, Cache Creek-Blue Ridge and the Berryessa area. The Paradise Ridge Trail area of King Range National Conservation Area is being developed in accordance with the King Range NCA Resource Management Plan and it is accurate to say that mountain bikes will have access to this area. IMBA members appreciate Mr. Thompson's efforts in these areas.

Despite the progress made so far, significant areas included in HR 233 remain unresolved, including the following: Snow Mountain, Yolla Bolly, Cache Creek and Trinity Alps. In this regard, the Committee may hear that some of the trails in the Six Rivers National Forest and Mendocino National Forest identified in IMBA's materials are closed to mountain bikes. This is not correct information. IMBA staff has consulted closely with Forest Service staff from offices

of the Mendocino 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. Official designation of trails in that sense that the Forest Service needs to post a sign that says a trail is open to bikes is not required – it's presumed a trail is open unless the Forest Service posts a sign closing the trail to bike access. 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). Furthermore, Forest Service Handbook sections on trail development, construction and maintenance clearly state,

Mountain bikes can utilize trails and routes constructed for other purposes. Mountain bikes can be ridden on hiker, pack and saddle, and motorized bike trails and four-wheel drive ways.

(FSH 2309.18 - TRAILS MANAGEMENT HANDBOOK, CHAPTER 2 - TRAIL DEVELOPMENT, 2.3 - TRAIL CONSTRUCTION AND MAINTENANCE GUIDES 2.31 - Nonmotorized Trails, 2.31c - Mountain Bike. WO AMENDMENT 2309.18-91-2, EFFECTIVE 11/8/91, available at <http://www.fs.fed.us/im/directives/fsh/2309.18/2309.18.2.txt>.)

The 'open unless closed' management approach was not changed by the recent OHV rules issued by the Forest Service. Thus, a national forest trail does not need to be designated to be open to mountain bike use.

Six Rivers National Forest

The Six Rivers National Forest identifies the following trails for mountain bike use: Barry Creek Trail (12W01), Boundary Trail (12W03), Dan East Trail (5E14), Elk Camp Ridge Trail (2E02), Groves Prairie Trail (6E67), High Dome Trail (3E02), Little Bald Hills Trail (1E03), and Paradise Trails (2E02).

IMBA members have identified additional trails that are currently open to mountain bike access, including: Trinity Alps - Red Cap unit, Horse Ridge National Recreational Trail and 6E08 to Packsaddle Ridge, Packsaddle Ridge Trail, and 09N31A.

In addition, a list of "Temporary Closure & Restriction Orders" for the Six Rivers National Forest is available at the following link: <http://www.fs.fed.us/r5/sixrivers/conditions/orders/>. As far as IMBA can determine, none of these orders closes trails to mountain bike access. Furthermore, in March 2005, Julie Ranieri, Public Affairs Officer for Six Rivers National Forest, told IMBA staff that the agency has not issued any administrative orders closing trails to bicycling in Six Rivers.

Mendocino National Forest

In addition, the Mendocino National Forest provides a list of 'recommended' biking trails, including: Letts Lake Loop, Travelers Home National Recreation Trail, Kingsley Glad/Slab, Calamese Rock, Cold Springs/Thomes Pocket, Hell Hole, Miner Ridge Loop, South End Loop, and Anthony Peak/Buck Rock.

IMBA members have identified additional trails that are currently open to mountain bike access which are detailed in the attached trail list. In sum they include:

- Snow Mountain-Skeleton Glade Cold Creek 8W18, 9W32, 9W49, 9W55, 9W56, 8W13, 8W17, Skeleton Glade to R100;
- Yolla Bolly: Traveler's Home National Recreational Trail 10W13, 10W51, 10W56, 11W31, 11W06 and Hellhole Canyon 11W48.

The fact that the Mendocino NF lists recommended trails does not imply that all other trails are closed to mountain bike access. In fact, the website for the Mendocino National Forest states,

Although most areas in the Forest are open to biking, there are a few places where you cannot ride. Bikes are not permitted within the Wilderness Areas, or in areas specifically signed as off-limits to bikes. Many areas suitable for mountain biking are not maintained. Loose rocks, ruts, limbs and logs across routes, steep dropoffs, and other hazards are part of the sport of mountain biking. Please ride according to current conditions, be sure your speed is appropriate. Wear your helmet and gloves. Stay alert! Don't hesitate to dismount and walk when you are unsure of route conditions ahead of you. Ride with a buddy.
[<http://www.fs.fed.us/r5/mendocino/recreation/trails/>] [*Emphasis added*]

A list of Special Orders/Closures and Forest Orders for the Mendocino National Forest is available at this link: <http://www.fs.fed.us/r5/mendocino/recreation/regs/closures/>. As far as IMBA can determine, none of these orders closes trails to mountain bike access. Furthermore, in March 2005, Jack Horner, Recreation Manager for Mendocino National Forest told IMBA staff that there are no administrative orders closing trails to bicycling in the Mendocino National Forest.

IMBA has not been 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. For these reasons, IMBA believes these trails are open to mountain bike access, and should be kept open in order to preserve a range of cycling opportunities to the full spectrum of mountain bikers, beginner to expert.

Thank you for the opportunity to clarify IMBA's submittals and to provide supplemental comments on this important legislation. IMBA looks forward to working with the committee and I welcome any questions.

Sincerely,



Mike Van Abel
Executive Director