

[...]

This letter is in response to your October 22, 2012, email. I appreciate your interest in finding solutions that minimize conflict and the offer to work collaboratively on resolving and improving trail stewardship. My staff and I have a keen interest in improving mountain bicycle recreation experiences and increasing opportunities in appropriate places where shared use with bicycles already exists or is not prohibited. Both here and nationally, the Forest Service has partnered through a Memorandum of Understanding with the International Mountain Biking Association (IMBA) and other organizations to collaborate on the development and maintenance of shared use trails that meet agency goals for resource protection while providing and improving high quality mountain biking experiences.

Nation-wide the Forest Service provides the largest trail system in the nation with over 157,000 miles within the system. Outside of designated wilderness there are 125,962 miles of trail, of which 123,739 miles are open to mountain bicycling (98%) and 12,389 miles of trail managed specifically for mountain bicycling. We agree that there is much to be gained by selecting focal areas to work with communities and non-profits to improve mountain bicycling opportunities.

National Scenic and Historic Trails are to be managed for the activities and uses for which they were established by Congress as set forth by law. The primary uses for the Pacific Crest Trail (PCT) were determined by the Comprehensive Management Plan and are also found in 36 C.F.R. § 212.21 as "primarily a footpath and horseback riding trail." The Comprehensive Plan is explicit in its "Criteria for Location, Design, Signing and User Facilities" that the trail should "provide opportunities for hikers, horseman, and other non-mechanized travelers." The bicycle closure for the PCT (1988) was developed with the unanimous support of the PCT Advisory Council after the Comprehensive Management Planning effort was completed. As you are likely aware, the Advisory Council, required by the National Trails System Act (NTSA) (Sec.5(d)), contained members from each state at the recommendation of the Governors, representatives from each federal or independent agency that the trail passes through, and members appointed to represent private organizations, including corporate and individual landowners and land users.

Legislative direction for considering additional uses beyond the primary uses of foot and horse travel is found in NTSA Sec. 7(c): "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged



with the administration of the trails." The requirement to determine an identified carrying capacity of the trail and a plan for its implementation (Section 5(e)) would also need to be met. At this time, the Forest Service will not be pursuing a Comprehensive Management Plan Amendment and the rulemaking that would be required solely to consider adding "other uses" to the PCT. We will not be pursing "termination" of the bicycle closure order either for similar concerns. Our focus for management of the PCT continues to be ecological restoration and the backlog of maintenance resulting from wildfires, the Sierra Wind Event of 2011, and the flood events of 2006 and 2009 in Washington State.

There are many places where shared use with bicycles already exists or is not prohibited, and we support working together to improve mountain bicycle access and opportunities to connect local communities to National Forest System lands. Our region is currently working with the IMBA to identify where these opportunities exist and we welcome your assistance to identify sites and work to leverage resources for planning and implementation. [...]

Sincerely,

[....] RANDY MOORE Regional Forester