



January 26, 2016

Mike Van Abel
IMBA Executive Director
4888 Pearl East Street, Suite 200 E
Boulder, CO 80301

Dear Mr. Van Abel:

We are writing this letter to reiterate the Folsom Auburn Trail Riders Action Coalition (FATRAC) and Bicyclists of Nevada County (BONC) support of the Sustainable Trails Coalition (STC) and STC's mission to return the Wilderness Act to its original intent. FATRAC and BONC support the Human Powered Wildlands Management Act of 2016 by the STC to achieve this goal, and we urge IMBA to also support this important legislation.

When the Wilderness Act of 1964 passed, it contained a provision banning "mechanical transport" as a means for travelling through Wilderness areas. Research and documentation shows that the prohibition was intended to ban motorized vehicles and other devices powered by non-living power sources. Unfortunately, under political pressure from wilderness proponent organizations, it has been misinterpreted by federal agencies to ban bicycles in Wilderness areas. This misinterpretation was subsequently codified in the June 21, 1984 Federal Register, Final Rule. This was done in spite of the fact that bicycles are human powered, a key attribute differentiating bicycles from the banned mechanized transportation included in the original 1964 Wilderness Act¹.

FATRAC and BONC are longstanding IMBA Chapters and with a history of working collaboratively with local land managers in northern California. As well-established chapters, located in California near much of the nation's Wilderness, FATRAC and BONC are requesting that IMBA publicly support STC and their legislation. Currently, IMBA suggests focusing advocacy efforts on "1) acceptable Wilderness, 2) boundary adjustments, 3) Non-Wilderness corridors/cherry stems, and/or 4) companion designations" in the "Wilderness Toolkit". How is such a strategy more beneficial to either the mountain biking community or proponents of Wilderness compared to actually dealing with the "gorilla in the room" and simply negotiating if or how to include mountain biking in a given Wilderness or Proposed Wilderness area? Further, IMBA's current position is that bicycling is compatible with the purpose of Wilderness; yet to date, IMBA has not supported STC's plan to give local land managers the option of allowing bicycles on specific trails in specific Wilderness. IMBA's current silence on the issue creates an unfortunate juxtaposition.

¹ Per 36 CFR § 293.6(a) (1973), formerly 36 CFR § 251.75 (1966) - "Mechanical transport, as herein used, shall include any contrivance which travels over ground, snow, or water, on wheels, tracks, skids, or by floatation **and** is propelled by a nonliving power source contained or carried on or within the device."

We understand that IMBA is revising its overall advocacy strategy in February of 2016. As such, we request that IMBA include avenues to support STC and the proposed Human Powered Wildlands Management Act of 2016. We are confident that such a position of support would help invigorate FATRAC and IMBA membership. This confidence is based on both anecdotal evidence gained through personal correspondence and a recent survey that FATRAC organized in which 80-percent of the 401 respondents indicated that they expect us to prioritize gaining access for mountain biking². Ongoing efforts by conservation groups to create additional Wilderness areas, while well intentioned, continue to reduce mountain biking access. If we do not remove the blanket ban on mountain biking in Wilderness, we are concerned that we will continue to lose ground, similar to the loss of access in the Boulder-White Cloud Wilderness in Idaho.

We empathize that IMBA has a responsibility to its members nationwide. We also understand that IMBA needs to maintain existing, collaborative working relationships with Wilderness advocacy organizations and other user groups. However, we do not believe that support of STC will alienate any of these groups. Instead, we believe if STC is successful, it is likely to create a future environment where IMBA would be more closely allied with Wilderness advocates. Instead of seeking piecemeal concessions for mountain biking access in the politically charged environment that surround nearly every proposed Wilderness, IMBA and local chapters could focus on demonstrating the value of mountain biking to individual land managers on a trail specific basis. This would create a “win-win-win” situation for IMBA, Wilderness proponents and the local land managing agencies.

The Human Powered Wildlands Management Act of 2016 will promote the continued preservation of our scenic areas and help focus the pro-Wilderness voice by allying mountain bikers with other user groups. Allowing bicycles in such areas frequently has the added benefit of fostering economic vitality for surrounding municipalities, and will increase both monetary and volunteer support for chapters and IMBA as a whole. We also want to reiterate that FATRAC, IMBA and STC all have an important role in this discussion, and all need to support each other if any of us are going to be successful.

If you have any questions, or would like to discuss further, please contact me.

Sincerely,



Matt Wetter, President
FATRAC President



Jamiel Fox
BONC President

cc: Robert Winston, Chair, IMBA Board of Directors
Ted Stroll, Sustainable Trails Coalition

² Ninety-seven percent of the respondents identified themselves as riding their mountain bikes once a month or more. Access to Wilderness was not specifically included in the 2014 survey but is being considered for a future survey.