



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

Tracy Ridge Proposal  
Mr. Rich Hatfield, District Ranger  
Bradford Ranger District  
29 Forest Drive  
Bradford, PA 16701

RE: Tracy Ridge Proposal

Dear Mr. Hatfield,

The International Mountain Bicycling Association would like to thank the U.S. Forest Service for the opportunity to provide comments on the Environmental Assessment (EA) of the Tracy Ridge Proposal as we share a vision of sustainable outdoor recreation on the Allegheny National Forest and a desire to improve public access and appreciation of this world class public asset.

IMBA's two chapters in this area and our members are excited to support Alternative 2 of the EA—Proposed Action for 12.5 miles of trails on the Allegheny National Recreation Area be open to bikes—as the EA states that there are no findings of significant impact to the environment, quality of the trail and trail experience.

The 2007 Forest Management Plan states that Tracy Ridge is in Management Area (MA) 8.2, National Recreation Area and does not, by definition, prohibit bike use, and is adequately protected. The Plan also contains a number of goals that support the shared use trail proposal at Tracy Ridge including to “provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation sites and special features.” Furthermore, the Plan calls for “mapped, marked, and maintained trail system[s] to minimize user conflicts, impacts to natural resources, respond to changing social needs ...”

### **Environmental Impacts From Trail Users**

Numerous scientific studies exist regarding the natural resource impacts of mountain biking showing that mountain bicycles do not disturb the environment any more than hiking. For instance, several studies show that mountain bicycles cause less erosion than other activities, including hiking and horseback riding.

1. *Assessing and Understanding Trail Degradation: Results from Big South Fork National River and Recreational Areas*, United States Department of Interior (2006), Jeffrey L. Marion. Finding that bicycle trails were the least eroded, narrowest, and least muddy of the trails studied, including hiking, equestrian, ATV, and mixed-use trails.



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2. *Managing Recreational Mountain Biking in Wellington Park, Tasmania, Australia*, Annals of Leisure Research, Vol. 6, No. 4, 339-361 (2004), Luke Chiu & Lorne Kriwoken. Finding no significant difference in the surface wear on a control plot by hikers and mountain bicyclers.
3. *Erosional Impacts of Hikers, Horses, Motorcycles and Off-Road Bicycles on Mountain Trails in Montana*, Mountain Research and Development, Vol. 14, No.1, 77-88 (1994), John Wilson & Joseph P. Seney. Finding no difference between the erosional impacts of hikers and mountain bicyclers in a controlled study, and noting that horses cause the most erosion as does motorcycle riding on wet trails.

### **Impacts to Wildlife**

As it relates to impacts on wildlife, other scientific studies involving bison, mule deer, pronghorn antelopes, desert bighorn sheep, European alpine chamois and American bald eagles suggest that mountain bicycles have equal or less impact on wildlife than hikers.

1. *Wildlife Responses to Recreation and Associated Visitor Perceptions*, Ecological Applications, Vol. 13, Issue 4, 951-963 (2003), Audrey Taylor & Richard L. Knight. Noting a general lack of difference between wildlife responses to hikers and bicyclers, and finding that all recreationalists underestimate the distances at which wildlife is sensitive to human presence.
2. *Responses of Desert Bighorn Sheep to Increased Human Recreation*, Journal of Wildlife Management, Vol. 65, No. 3, 573-582 (2001), Christopher M. Papouchis, Francis Singer & William Sloan. After monitoring the actions of 1,029 bighorn sheep and human interactions, concluded that hikers cause the most severe responses in the sheep, fleeing in 61% of the encounters; followed in a distant second by vehicles (17%) and mountain bicyclers (6%).
3. *Reactions of Male Alpine Chamois to Hikers, Joggers and Mountain Bikers*, Biological Conservation, Vol. 79, 107-109 (1996), Hans Gander & Paul Ingold. Found no significant difference by the passage of hikers, joggers or mountain bicyclers.
4. *Factors Affecting the Distribution of Bald Eagles and Effects of Human Activity on Bald Eagles Wintering along the Boise River*, Boise State University, 1990, Robin Spahr. Found that the largest amount of eagle flushing was caused by walkers (49%), then fishermen (34%), followed by bicyclists (15%) and joggers (13%).
5. *Effects of Off-Road Recreation on Mule Deer and Elk*, Transactions of the 69th North American Wildlife and Natural Resources Conference: 531-550 (2004), Michael J. Wisdom, et. al. Found that mule deer reactions to mountain bicycling were no greater than to hiking. Elk did react at a greater distance to bicycling than hiking or horse use, though it is unknown whether their reaction adversely affects the elks' health and survival.

### **Impacts to Vegetation**



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With respect to vegetation, no scientific study indicates that bicycling causes more degradation of plants than hiking.

1. *Impacts of Experimentally Applied Mountain Biking and Hiking on Vegetation and Soil of a Deciduous Forest*, Environmental Management, Vol. 27, No.3, 397-409 (2001), Ed Thurston & Richard J. Reader. The only existing study comparing trampling of vegetation by bicyclists and hikers shows trampling at equal rates.

### **Impact Summary**

These scientific studies are remarkably consistent in their findings. The range and depth of sources, from academics to government researchers, suggests that these studies were objectively conducted to determine what, if any, impacts mountain bicycles have on the environment. The findings of the EA reflect the conclusions of these independent studies.

### **Mountain Biking Participation**

The Proposed Action satisfies the goals of the 2007 Forest Plan to “provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation sites and special features,” “respond to changing social needs,” and “support a wide variety of recreation opportunities” (Forest Plan, p.13).

According to the Outdoor Foundation’s 2016 Outdoor Recreation Participation Report, mountain biking has shown an increase in participation over the most recent three-year period, ranked third in most favorite outdoor activity and ranked second in frequency of participation (p. 11).

The Proposed Action will take advantage of this growing recreational user group and will provide increased use of trails and the Tracy Ridge campground that have been “underutilized” in recent years. The trails present a unique backcountry experience that many mountain bikers are actively seeking. A recent study of IMBA members indicated that nearly 90% of members prefer a cross-country singletrack experience. Current mountain biking opportunities in the Forest are restricted to Forest Service roads and ATV trails; and don’t provide the high-quality experience that people who ride mountain bikes are earnestly seeking.

### **Public Lands Stewardship**

IMBA and its members believe strongly in sustainable and quality trail experiences, This is clearly evident by the eagerness of IMBA chapters to assist land managers with continued trail maintenance and development. This is also proven in the 2016 IMBA Member Survey that concluded that more than 700,000 hours of volunteer stewardship were performed by IMBA members on public lands across the country in 2016.



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We believe the proposal to redesignate the 12.5 miles of trail to shared-use to be modest and fair. In addition, it clearly meets the changing needs of the Forest and your visitors with the very significant growth of mountain biking as a sustainable and healthy recreational activity. With over 150 miles of exclusive-use hiking trails, including 34 miles at Tracy Ridge, we believe the proposal to be an encouraging beginning for accommodating mountain bikers on the Allegheny National Forest. As an added benefit, we look forward to the resulting partnership between the Forest Service and local IMBA chapters which will help provide much needed maintenance assistance and use of these trails. IMBA chapters have a well-established history of providing public land managers with volunteer stewardship services, and encouraging other outdoor recreationists to participate in much needed maintenance activities.

Founded in 1988, IMBA leads national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 600 dealer members, and 210 local Chapters. IMBA teaches sustainable trail building and trail maintenance techniques and is a leader in trail design, construction, maintenance and visitor etiquette. IMBA encourages responsible riding, volunteer trail work, and cooperation among trail user groups and land managers.

Thank you very much for your respectful consideration of our comments. IMBA chapters, members and I look forward to assisting you and Forest Service personnel in sustainably maintaining and improving the trail system at Tracy Ridge.

Respectfully,

A handwritten signature in black ink, appearing to read 'Anthony Duncan', with a long horizontal flourish extending to the right.

Anthony Duncan, Atlantic Region Director  
International Mountain Bicycling Association