



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

U.S. Secretary of Agriculture- Brooke Rollins
U.S. Department of Agriculture – U.S. Forest Service
Office of Ecosystem Management Coordination

Re: Comments on Roadless Rule Rescission- Federal Register Number
2025-16581

On behalf of the International Mountain Bicycling Association (IMBA) and our nationwide network of members, chapters, and partners, we respectfully submit the following comments regarding the U.S. Forest Service's proposal to rescind the 2001 Roadless Area Conservation Rule (Roadless Rule).

The International Mountain Bicycling Association is a 501c3 nonprofit that creates, enhances and protects great places to ride mountain bikes. IMBA is focused on creating more and better trails close to home in 250 communities by the end of 2025 to grow the quantity and quality of mountain bike trail communities, so everyone has access to close-to-home riding and recreation as well as iconic backcountry experiences. Since 1988, IMBA has been partnering with communities and land managers worldwide to encourage low-impact riding, grassroots advocacy and education, sustainable trail solutions and stewardship, innovative land management practices, and cooperation among trail user groups. IMBA's international network of hundreds of thousands of supporters includes hundreds of Local Member organizations across the U.S., led by community trail champions, passionate riders and dedicated volunteers working together for the benefit of the entire community.

IMBA's Past Support and Future Management Priorities

Following more than 600 public hearings across the country and 1.6 million official public comments, of which over 90% were in support, IMBA was also highly supportive of protecting Roadless Areas during the development of the 2001 Rule, and that support continues today. However the mountain bike community and IMBAs perspective is unique because we have experienced cherished trails permanently closed due to new Wilderness designations and we've lost access due to incompatible timber clear cuts, and oil and gas development infrastructure. **We oppose any forest management proposals and actions that close off mountain bike trail access.**

For our diverse community of trail enthusiasts and advocates, Roadless Areas struck a perfect balance between three sensible goals of recreational access, landscape protection, and restrained multi-use management without tipping the prescriptive management scales in any one category's favor at the expense of the others.

Roadless Areas are more pristine than the more developed landscapes of our National Forests. This makes them ideal for backcountry mountain biking, a unique and valued experience that

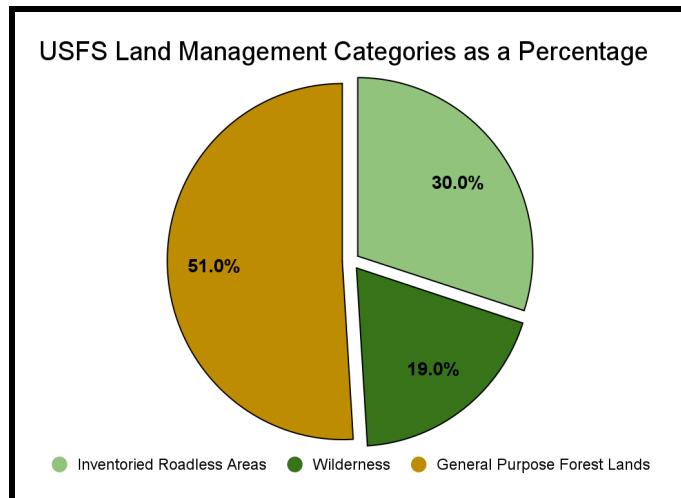
we seek to retain. IMBA advocates for balance, and in Roadless Areas, we believe that balance should prioritize both high-quality backcountry recreation and watershed protection.

To put this in perspective, consider the two ends of the forest management spectrum:

General Purpose Forest Lands (Matrix Lands): Roughly half (**50%**) of our National Forests are already open to timber sales, mining claims, and oil and gas exploration. These lands are extensively roaded to support intense commercial activities as well as special use permits and broad public access. As working forests, they are subject to both planned human impact and unplanned environmental degradation. Currently, the U.S. Forest Service manages over 370,000 miles of roads, with a deferred maintenance backlog exceeding \$10 billion. That's enough roadway to drive across the U.S. coast-to-coast 127 times.

Wilderness: On the opposite end of the spectrum is Congressionally designated Wilderness which make up **19%** of USFS lands. Designated Wilderness areas are strictly protected to preserve their natural character and allow the least human influence. Mechanized travel, including mountain biking, is prohibited in Wilderness areas. While we respect and in some cases support Wilderness protections when they do not impact existing mountain biking trails, they offer no access for mountain biking.

Roadless: Between these two extremes lie the remaining **30%** of lands where there are no public roads, but where there are administrative access and other authorized uses that place them in a middle ground of management intensity. This middle ground seeks to manage these lands more, but not exclusively, for both their recreational values as well as retaining their existing ecological values. Whether these lands are under a Rule or not, these balanced middle ground attributes are critical to maintain. The restraint that was baked into the Roadless Rule was in recognition that these lands can be managed this way in perpetuity.



More intensive resource extraction is better concentrated on already-developed General Forest Lands, where road infrastructure exists and human activity is already widespread.

Consequently, within these three broad categories, nearly 100% of the 370,000 miles are in over 50% of lands that are neither designated Wilderness nor under Roadless protection. IMBA supports keeping the last remaining roadless lands as unfragmented by roads as possible yet

still open for the diverse recreational opportunities, like mountain biking, that are currently allowed.

With a rare yet informed view to the future, the Rule sought to limit the unsustainable cost and deep ecological impact of an ever-growing road network expanding into some of the last remaining undeveloped lands. The clean air and water, recreation, biodiversity, and wildlife habitat values of these remaining unfragmented landscapes outweighed their developmental value for short-term timber and other road dependant developments.

The Role of Recreation

For IMBA and mountain bikers in general, where mountain biking is off limits in Wilderness, Roadless areas provide a relatively pristine immersive backcountry experience that affords solitude, challenge, remote character, all while having a level of accessibility from local communities. For this reason, IMBA has supported and defended the Roadless Rule since its inception.

IMBA does not feel that the Roadless rule is out-of-date or out-of-touch with forest health goals or what Americans want from management of their national forests. IMBA believes that Roadless Areas have been critical for meeting the access to recreation while balancing the clean water and clear air needs of communities for restorative forest experiences away from industrial-scale developments and impacts that are ever-present in our forest and daily lives.

Regionalized sampling of cherished iconic mountain bike trails protected by IRAs under the 2001 Roadless Rule:

Eastern Forests

- [Wolf ridge trail](#), 19 miles of single track in the **Little River Roadless Area**, George Washington NF, Harrisonburg, Virginia

West Coast Forests:

- [Strawberry Peak Loop](#), 16 miles of singletrack in the **Strawberry Peak Roadless Area** in Angeles National Forest, Los Angeles California.

Southeastern Forests:

- [Round Knobs Loop](#)- 19 miles of trail in and around the Sampson Mtn IRAs, Cherokee NF, Johnson City, TN
- [Mountaintown Creek Trail](#), 20 mile loop surrounding Cohutta IRA, Chattahoochee NF, Georgia

Southwestern Forests:

- [Continental Divide NST \(Section 31 portions\)](#), single track in the Cruces Basin IRA, Carson National Forest, New Mexico
- [Lost Lake Trail #91 and East Fork trail](#), 13.8 miles of backcountry trails forming the boundary of the Wheeler Peak Roadless area, nestled between the Wheeler Peak and Columbine Hondo Wilderness', in the Carson NF, Taos NM.
- [Comales Trail #22](#), 8 miles of remote trail along the "Sipapu" Roadless Area, Carson NF, NM

Pacific Northwest Forests

- [Veda Lake Trail #673](#) a short 1.5 mile trail into a the Salmon-Huckleberry IRA in Mt Hood National Forest, Oregon
- [Oregon Timber Trail Old Cascade Crest and WyEast](#) (Segment 8/9 portions of) Willamette NF, Mt Jefferson IRA, Oregon
- [Orogenesis Trail](#) - World's longest mountain bike trail that passes through 87 Roadless areas traveling north to south across the US

Intermountain West Forests

- [Blodgett Canyon](#), 14 miles of backcountry trail in IRAs of the Selway Bitterroot near Hamilton, MT
- [Ward Mountain](#) 13 miles of backcountry trail in IRAs of the Selway Bitterroot near Hamilton, MT
- [Sapphire Crest and Rock Creek Divide](#) over 25 miles of trail in in the Welcome Creek IRA zone, Lolo NF, Hamilton, MT

The Forest Service manages approximately 55,000 miles of trails in Inventories Roadless Areas nationwide, with about 48,000 miles outside the unaffected Colorado and Idaho roadless areas. Of these, an estimated **15,000–16,000 miles remain open to “mechanized use” which is the primary allocation that authorizes mountain biking access.** These trails include segments of nationally significant routes such as the Continental Divide National Scenic Trail and numerous iconic backcountry systems in the Rockies, Sierras, Cascades, Appalachians, and beyond.

The nation’s remaining unroaded areas on National Forest Lands continue to be a backbone contributor to the robust and growing outdoor recreation economy. According to the Outdoor Recreation Roundtable, the U.S. outdoor recreation sector generated **\$1.2 trillion** in economic output in 2023, which equates to about **2.3% of GDP** and supports **5 million jobs** representing roughly **3.1% of U.S. employment**. The crafting of the 2001 Roadless Rule has been a key factor in why this dynamic exists. These places are both more accessible than Wilderness and more diverse in their recreational assets and are therefore cherished for the experiences gleaned by a wide spectrum of the American public. From motorized trails for electric-mountain bikes (eMTBs), to shared non-motorized backcountry trails for hiking, mountain biking, hunting and equestrian use, roadless landscapes provide a balanced mix of diverse recreational access, critical environmental resource conservation for clean air and clean water, unfragmented wildlife habitat, all while offering active and flexible forest management that focuses on protecting human life and property safety from wildfire instead of maximizing commercial profit off our last remaining wild places.

Broad Public Support Exists for Continued Protections

Roadless area protection has long been a bi-partisan issue among general public opinion. According to a 2019 Pew Charitable Trust-SSRS poll, 65% of Republicans favored the Roadless Rule along with 77% of Independents, and 87% of Democrats. Whatever the outcome of this proposal, we urge the Administration to honor the legacy of broad public support for clean air, water, and backcountry recreation that has defined these lands for over two decades. IMBA wants to see continued improvements to Forest Management that build a better future for these lands.

IMBA’s RECOMMENDATIONS FOR BUILDING BACK BETTER

While rescinding the Roadless Rule may place management decisions more at the local level, that will inevitably create wide discrepancies for how these landscapes are managed. If certain leadership precautions and management sideboards are not instituted, the values that make Roadless Areas so popular with the American public will be incrementally and irretrievably lost.

If rescission of the Rule is inevitable, IMBA recommends the following steps to ensure Roadless landscapes are managed responsibly and recreation remains protected:

Recreational Access

- Protect recreational access and establish a national “No Net Loss of Trail Opportunity” policy.
- Create a National Recreational Assets Database with baseline condition surveys for each forest.
- Require each Forest to complete a Recreation Audit, including accurate trail inventories and desired future condition assessments, developed with mapping partners.
- Ensure new developments avoid existing trail assets and protect iconic or unique trails that cannot be replaced.
- Issue national guidelines to retain the wild character of Roadless landscapes and prevent their de facto conversion into Wilderness-like management through local or state-level decisions.
- Guarantee that if trail mileage or access is disrupted, equivalent or better opportunities are provided nearby.
- Protect existing mechanized trail access from being closed, diminished, or subjected to Wilderness-like restrictions.

Minimize Incursions

- Establish a Minimum Roads Policy
 - Minimize new sources of fragmentation
 - Requires cumulative impacts reviews for any new road or development proposal with a focus on recreational access, watershed health, habitat connectivity
 - Prohibit permanent developments and permanent roads
 - Require that any new roads are minimum size possible and for administrative use only
 - Require that any new roads are temporary and must be rehabilitated after use
 - Assess converting new roads into public trails after use if providing improved connectivity and public access system
- Prevent clear cuts to forest landscapes
 - Limit wildfire treatment to Wildland Urban Interface (WUI) areas
 - Avoid backcountry impacts

Invest in Forest Planning

- Reinvest potential cost savings from the USDA Reorganization back into local forests for forest planning and project implementation
- Invest in the USFS local staffing needs to carry out management.

Broaden Public Engagement

- Improve Collaborative planning and Stakeholder input
 - Require a consistent structured local public engagement
- Replicate State Specific Roadless Rules (CO/ID)
 - Strive for consistency to minimize broad management discrepancies

According to Idaho Senator Jim Risch's website, in 2011 he emphasized, the Idaho Rule was "a victory for the collaborative process." "*This ruling shows that the collaborative process is viable in resolving federal public land disputes at the state level.*" and "*is a credit to all the Idahoans who put a great deal of time and effort into crafting the various protections for Idaho lands*".

Consistency = Efficiency

- Adaptive Management and Accountability
 - Monitor against baseline assessment
 - Economies of Scale of national guidelines
- Management Framework- consistency and predictability saves money

Protect Community Safety

- Create a Watershed Protection Plan to analyze impacts
- Prioritize Wildfire Resilience and Forest Health without overdevelopment

In closing, IMBA urges the Administration to recognize that America's remaining Roadless Areas are an irreplaceable national asset that serve the dual purpose of providing unparalleled backcountry recreation opportunities for millions of Americans along with a balanced approach of protecting clean air, clean water, and wildlife habitat while also providing unparalleled. The Roadless Rule has proven itself to be an effective tool to maintain the character of these lands. That character continues to enjoy broad public support and has safeguarded the values these lands provide for nearly a quarter century. Let's work together to champion this valued approach. Rescinding the Rule without equally strong, consistent safeguards risks fragmenting landscapes, eroding recreational access, increasing management inefficiencies, and igniting more cycles of litigation and conflict. If change is inevitable, we request it be guided by science, national sideboards, collaborative processes, and firm commitments to recreation, watershed health, and resource protection. We urge the Administration to protect the legacy of these lands, honor the clear public will to retain them, and ensure that their backcountry character and recreational value continue for future generations.

On behalf of IMBA, the 8 million mountain bikers in the U.S., our 236 clubs which represent over 50,000 individuals,



Aaron Clark- IMBA Government Affairs Policy Manager