



Michelle Lombardo  
Mt. Hood National Forest  
16400 Champion Way  
Sandy, Oregon 97055

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Dear Ms. Lombardo,

Thank you for allowing us to comment on the “Road Decommissioning for Habitat Restoration, Increment #3”. As the largest and only international representative for mountain bicyclists, the International Mountain Bicycling Association (IMBA) works extensively with land managers, professional trailbuilders, the cycling industry, and community leaders in the pursuit of improving sustainable riding opportunities. Using the road decommissioning process as an opportunity to build trails is an excellent way to combine watershed protection, habitat restoration and improve recreation access.

#### Economic Impacts

The south side of Mt. Hood has historically been a valuable place for mountain bicycling in the Mount Hood National Forest (MHNF). Its proximity to the Portland Metro area and the Hwy 26 recreation corridor provides convenient access for visitors seeking mountain biking opportunities. This opportunity to add non-motorized trails for mountain biking is of particular importance given the recent expansion of the Mt. Hood Wilderness area. The loss of close to 100 miles of trail has diverted visitors, decreased connectivity and put more pressure on remaining routes. Restoring access will reduce the gap in the provision of mountain bicycling opportunities in the Mt. Hood area and continue the path of economic growth for area businesses. In addition, the potential to build new beginner to intermediate facilities would attract an entirely new visitor demographic to experience the MHNF.

#### Environmental Impacts

Proper road to trail conversion will have a positive impact on watersheds and wildlife habitats. The removal of culverts and the restoration of drainages will reduce siltation and reconnect smaller streams to their headwaters. This will improve water quality, increase fish populations and restore habitat for wildlife. The International Mountain Bicycling Association is a world leader in the



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development of sustainable trail building standards and practices. The use of these techniques has the potential of decreasing maintenance loads and will result in a high quality, low impact mountain bicycling trail.

### Road to Trail Conversion

The road to trail conversion process is an exciting tool because it has the ability to provide for recreation while solving many of the problems caused by roadbeds. There are three basic types of road to trail conversion processes:

- 1) The roadbed is fully decommissioned by pulling the fill slope up to meet the cut bank. All culverts are removed and the natural hill slope is restored. The cutting of full bench-cut trail follows this process.
- 2) A meandering trail is first laid out on the roadbed. The out-slope areas are pulled up to fill the excavated bench and narrow it to tread width. The surplus material is used to create rolling contour features and outslope at dips. All culverts are removed and replaced with at-grade crossings or bridges.
- 3) Vegetation, mulch, rocks and fallen trees are used to create a meandering trail on top of the existing roadbed. All culverts are removed and replaced with at-grade crossings or bridges.

We recommend that the USFS use method #2) for road to trail conversions. Method #1) is excellent for restoring habitats and watersheds but it causes settling issues in the tread and increase maintenance costs. Method #3) is economical but does little to improve drainages and visual impacts. It also ends up being a lower quality user experience and maintenance intensive. Only method #2) balances these approaches and creates a long term impact and a worthy investment.

### Focus Areas

To address the current and future needs of mountain bike trail users in the project area, we recommend focusing on four areas for road to trail conversion:

- 1) Hwy 35/White River to Keeps Mill Campground – This route would be approximately 15 miles in length and would have excellent access from Hwy 35 and FS 48. It would allow USFS to abandon the heavily silted upper 2 miles of Mineral Creek trail #538 and create a main artery to access area 2) and 3).





- 2) Clear Lake/Frog Lake – This area lends itself to family/beginner riders and would provide access to trails cut off by wilderness expansion like Twin Lakes #484 and Bonney Butte #471. The key attraction would be a trail that circumnavigates Clear Lake. This would leverage existing trailheads and easy access off of Hwy 26.
- 3) Boulder Lake to Keeps Mill – The emphasis in this key area should be to provide a rugged experience. Wilderness expansion has reduced the access to the Bonney Meadows area. New trails in this area would tie it back into the paved road networks off of FS48 and link all south side trails to the FS44 trail network.
- 4) 15 Mile Creek/Cedar Creek – The trail system off of FS 44 is heavily used and needs more miles to disperse use. The roads near Cedar Creek should be reexamined when this process looks at the Northern Increment.

Please see the attached map for specific roads and areas. I have indicated the roads to convert in yellow and dotted red lines indicate trails to be constructed to create connectivity between conversions and existing trails.

IMBA supports the USFS's decision to decommission these roads and looks forward to providing additional input into the planning and conversion process. Please do not hesitate to contact me if you have any questions about our comments.

For the land,

Shane Wilson, Trail Specialist



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