



June 5, 2014

Stephen P. Henry
Acting Field Supervisor
Ventura Fish and Wildlife Office (FWS)
2493 Portola Road
Suite B
Ventura, CA 93003

RE: Endangered and Threatened Wildlife and Plants: Designation of Critical Habitat for *Diplacus Vandenbergensis* (Vandenberg Monkeyflower)

Dear Mr. Henry

Thank you for the opportunity to provide feedback on the proposed rule of the critical habitat designation for the *Diplacus Vandenbergensis*; hereafter referred to as the Vandenberg Monkeyflower. We are submitting these comments to ensure that recreational, specifically mountain bicycling, experiences are considered along with the care and preservation of this species and their habitat while the policy and plans are being developed. Our experience has been that bicyclists, the trails we ride, and sensitive species can co-exist with proper planning.

Founded in 1988, IMBA leads national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 600 dealer members, and 150 local Chapters. IMBA teaches sustainable trail building techniques and has become a leader in trail design, construction, and maintenance. IMBA encourages responsible riding, volunteer trail work, and cooperation among trail user groups and land managers. Each year, IMBA members and supporting organizations conduct nearly one million hours of volunteer trail stewardship on America's public lands and are some of the best assistants to federal, state, and local land managers.

As a quiet human powered form of recreation bicycles have impacts on wildlife that are comparable to any human activity. Studies have been done to suggest that mountain bicycles and hiking have similar impacts on wildlife. Unmanaged recreation always has the potential to create adverse impacts to our natural environment and the flora and fauna that inhabit it. However, thoughtful management can avoid those potential effects while still allowing the public to experience these environments.

Though a draft economic analysis (DEA) was completed as well as Final Land Management Plan specifically for the Burton Mesa Ecological Reserve we've noted that the land management plan lacks any evidence of studies conducted to analyze the effects of human recreation on the proposed critical habitat and those activities specifically related to bicycling. We also recognize that an incremental effects memorandum (IEC) was completed and combined with the DEA as part of your consideration of economic impacts on the Vandenberg Monkeyflower habitat. The IEC also does not discuss nor display relevant content to the effects of dispersed recreation. We understand that the Vandenberg Monkeyflower is an annual plant that may express itself above ground once per year or less and its characteristics make it difficult to determine its pattern of growth.

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We are concerned about the extent of the Burton Mesa Chaparral habitat described as it also coincides with some of the only mountain biking experiences within 50 miles of the local community. Our local organizations are greatly concerned about this listing and the potential limitations on mountain biking trails and opportunities. Many of the local residents depend on the availability of locally accessible trails to help provide for their healthy active lifestyles. Our fear is that this listing will prematurely limit or halt the use of mountain bicycles in a landscape that has yet to be studied for the environment impacts that may pose significant effects or not to the Vandenberg Monkeyflower.

Carefully managed recreation can mitigate any potential disturbance of the Vandenberg Monkeyflower or its habitat. For example: trail construction and trail maintenance techniques can be used as a framework for enticing/encouraging trail users to conform their behavior to the desired conditions and avoid disturbing the Vandenberg Monkeyflower. All of these measures should be considered prior to resorting to outright prohibitions.

Americas public lands are the core of the outdoor recreation economy and tourism industries. The wildlife that inhabits them are an essential component of what makes them special. Careful management and planning can ensure that these places and the flora and fauna that inhabit them are protected while still allowing visitors to experience them. If we can be of further assistance please do not hesitate to contact us.

Respectfully Submitted,

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