

Thank you for the opportunity to comment as part of the Walnut Canyon Study process.

Background

Flagstaff Biking Organization is a group of cyclists who came together to “promote bicycling as a safe and attractive means of transportation and recreation in Northern Arizona.” Our initial project was to put on a Bike to Work Week for our community in May 2002. Building on the success we started to expand our efforts to keep people informed of cycling related issues and galvanize support for better and safer facilities, trails, and trail access.

We have been involved with input on the Walnut Canyon area since 2002. We have assisted in the construction of the Campbell Mesa trails and in maintenance of the Arizona Trail in this area. We proposed the Flagstaff Loop Trail, which is now set for alignment and partially constructed through this area as well.

Our primary concern is that bicycle access continues as it has in the past within the boundaries of the Walnut Canyon Study Area. Some of the most popular trails for mountain biking in the Flagstaff area are within these boundaries. The Campbell Mesa trails provide a beginner to intermediate riding experience that is not as common in the Dry Lake Hills or Fort Valley areas adjacent to Flagstaff. The Arizona Trail offers a unique canyon rim riding experience, distinct from the mountain trails nearby. The Arizona Trail also provides connectivity for an unparalleled opportunity to ride from the Mexico border to Utah. Once finished the Flagstaff Loop Trail will create connectivity to trails offering opportunities for non-motorized transportation and recreation between the City of Flagstaff, Flagstaff Urban Trail System, (FUTS), outlying neighborhoods and the surrounding National Forest Lands and Forest trail systems.

Difficulties with Park Service management

We have strong concerns with the designation of any of these lands as National Monument or National Park. Designations that would entail Park Service management are apt to be problematic for bicycling.

We are concerned that Park or Monument designation would present legal problems for trails being designated open for bicycle use. Currently changes are being made to policy that should allow for bicycles to be permitted on some existing trails in National Parks through a regular NEPA analysis, rather than through a Special Regulation coupled with NEPA. These changes would still not allow new trail to be constructed with bicycle access in mind. Although we have no intention to push for significant expansion of the existing and planned trails within the Study Area, we do think it may be appropriate in the future to provide connector trails between as yet to be constructed FUTS and the Flagstaff Loop Trail. Park or Monument designation could create insurmountable barriers to this.

We also do not believe that the Study Area is worthy of National Monument or National Park designation. Monuments and Parks are “America’s Best Places”. Although the Walnut Canyon Area outside of the current Monument boundaries is quite beautiful, and marginally unique to the immediate Flagstaff area, it lacks the specific significant criteria for National Monument or National Park status.

Regardless of the legal ramifications of bicycle access to National Park or Monument lands, the National Park Service does not focus on the unique aspects of trails constructed with bicycles in mind. Mountain bikers in Flagstaff seek a diverse range of experiences provided for by different parameters for trail construction than those typically employed by the National Park Service. We don’t believe that these types of experiences are best addressed by Park Service management.

We are concerned that trails that are currently free to ride may become part of a fee area, as Walnut Canyon National Monument currently is.

Preferred management option

This noted, we do support the need for a stronger level of protection of this landscape than is currently offered under the existing management plan.

We recommend and support the proposal being forwarded by Ralph Baierlein for the Walnut Canyon Study Area to be proposed for designation as a National Conservation Area under Forest Service management. It is our contention

that a National Conservation Area would provide both the permanent protection from development many Flagstaff residents support and the flexibility in management necessary to provide for the multiple user groups who enjoy and recreate within the Study Area. We support management by the US Forest Service because we see that this agency possesses the necessary expertise to manage for these multiple uses, and specifically bicycling, in an appropriate manner.

We appreciate this opportunity to comment. Please feel free to contact us should you have any questions regarding these comments.

We formally request to be included in any correspondence on this process both electronically and on paper.

Sincerely-

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