

July 14, 2010



Flagstaff Biking Organization
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Jennifer Burns
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Dear Jennifer-

Thank you for the opportunity to comment on the proposed action to add trails and trailheads to the Red Rock District trail system.

Background

Flagstaff Biking Organization (FBO) 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.

First and foremost we would like to wholeheartedly support and commend the District for its initiative in proposing to adopt these routes. Sedona and the Verde Valley is a world-class destination for mountain biking, and the inclusion of these trails will improve the continuity and variety of this trail system for mountain bikers from not only the Verde Valley, Prescott Valley and Flagstaff areas, but from all over the world.

Recent high-profile press presence for the Sedona area trails in Bike Magazine, Mountain Bike and other popular mountain bike enthusiast magazines highlight the fact the Sedona area is popular, and growing in popularity, with the mountain bike community.

We would also like to express our support for, and belief that, well-managed trail systems are one of the best tools available for mitigating the environmental and social impacts inherent in recreational use. Failure to provide for this demand will only lead to dispersing illegal and/or unmanaged use. Unmanaged use has immeasurably greater

impacts on resources, as there is nothing preventing this use from impacting soils, wildlife, archaeology or any of the other myriad resource concerns on public lands. Although proper law enforcement should play a part in any recreation management strategy, enforcement alone cannot be successful without appropriate opportunities for recreational users.

The existing trail system, while certainly a great mountain bike trail system, is currently inadequate in some ways that these additional trails would help to address. A list of ways the current system is inadequate and ways the additional trails will help to address these inadequacies follows.

- 1) Increasing use supersedes the current trail system's carrying capacity for user demand and addressing user conflict.
- 2) Increasing use may create need for more frequent maintenance intervals on existing trail system.
- 3) Existing trail system lacks connectivity for desirable loop rides.
- 4) Existing trail system fails to meet several experiences desired by mountain bike users.

Increasing use supersedes the current trail system's carrying capacity for addressing user satisfaction and user conflict concerns.

As the trails in the Sedona area have grown in popularity with all trail users, and as the sport of mountain biking has grown in popularity over the past several decades, the number of trail users on any given mile of trail in the Red Rock District has grown as well. More users on trails invariably will lead to increased opportunity for increased numbers of encounters, and potential for user conflict. The addition of these trails will disperse use, thereby reducing the number of encounters and increasing user satisfaction.

Increasing use may create need for more frequent maintenance intervals on existing trail system.

Although there is an argument to be made for more trails requiring more maintenance, we contend that reducing the amount of use on some trails will actually increase the required maintenance interval substantially. It is certainly the case that if trails are well built, using USFS and IMBA best practices, trails will require less maintenance. Some of the existing trail system does not abide by these guidelines which, when coupled with a high number of users, requires a high level of maintenance to prevent erosion. Adding the proposed trails to the system, with re-routes as necessary to maintain proper layout, would help to disperse use and mitigate erosive impacts to the existing trail system.

Existing trail system lacks connectivity for desirable loop rides.

Many of the routes proposed for inclusion have arisen to fulfill users' desire to connect system trails without using roads. Many of the proposed trails will address this need.

Formalization of these routes will allow for proper signage and mapping which will help to prevent more user created routes from developing.

Existing trail system fails to meet several experiences desired by mountain bike users.

By law, designated Wilderness does not allow mountain bike use. The existing system trails that are open to mountain bikes outside of the Wilderness in the Red Rock District do not provide for sufficient “challenge and adventure opportunities” as called for in *Chapter 4- Management Direction* in the Coconino National Forest Plan regarding trails. Most of these trails tend to be in close proximity to the urban interface and on lower lying terrain.

The trails proposed for addition to the system do, in fact, provide for “challenge and adventure opportunities” in that many of them are somewhat more remote from the urban interface, often skirting cliff edges.

Many of these trails also provide for a more “technical” riding experience. As riders and equipment have increased in capability, the demand for steeper, rockier trails has increased substantially. These trails help to address this demand.

The Coconino National Forest Plan states, in *Chapter 4 – Management Direction Sedona/Oak Creek Ecosystem – Transition – Management Area 29*:

“6. Design trails to discourage bicycle access into adjacent Wilderness and to otherwise minimize impacts on the Wilderness.”

A significant way that this can be accomplished is to provide sufficient opportunities to address the demand for bicycling opportunities that are similar to the perceived opportunities present in the adjacent Wilderness.

Also, providing trails that create connectivity where alternatives outside the Wilderness do not exist will also significantly reduce intrusions into the Wilderness. It will be necessary to assess the need, and potential location, for a trail open to bicycles that parallels the access provided by Margs Draw Trail, since this is currently the sole route to connect the trails in the Village of Oak Creek area to the West Sedona area trail on the east side of Highway 179.

Another trail experience that is currently under-represented on the Red Rock District is bike riding opportunities that are beginner friendly. The Bell Rock Pathway is a great example of this type of trail, but it is the only trail that meets this need. We ask that the potential for creating some new family-friendly beginner trails be assessed and if possible, some trails that meet this need be added to the system. These trails should be in stunningly scenic areas have well developed trailheads. As appropriate, interpretive displays highlighting natural and cultural points of interest could be added. These trails should tie-in to urban interface trail systems and bike lanes in the Village of Oak Creek and Sedona in order to facilitate easy access for visitors and area residents without the

need to drive to the trailheads. These trails should be primarily maintained as USFS Trail Classification 4.

Soils and watershed concerns.

Within several emails exchanged on and around April 27th, 2010, were some concerns regarding soils and watershed protection expressed by Amena Sena, District Hydrologist.

We agree almost entirely with these concerns and assertions. However, we are concerned that perhaps the environmental impacts to soils and watersheds caused by trails may be a bit overstated. We ask that any discussion of soils and watershed impacts that might be part of the analysis for this action express the impacts of trails as part of the overall impact of all of the various human disturbances on and around these trails. We believe that when the soils and watershed impacts of trails are considered as compared to other impacts, such as roads, the trails' impacts will be negligible in comparison.

This stated, we firmly support the need for certain of these trails' alignments to be changed to address sustainability issues. Specific recommendations will follow at the bottom of this document. We trust that other changes outside of those below may be necessary as well.

Cooperation from the mountain bike community and other trail-users.

There are several groups that work within the Northern Arizona area that will be available to assist in the construction, maintenance and upkeep of any new, and the existing, trails. The mountain bike community has a history of partnering with the Coconino National Forest for nearly two decades and this collaboration will continue. Both the Verde Valley Cyclists and Flagstaff Biking Organization have worked with the CNF extensively on trail maintenance and construction. Both groups have also facilitated visits from the International Mountain Bicycling Association's Subaru/IMBA Trail Care Crew to teach sustainable trail building techniques to various user groups. The community of trail users apt to most benefit from these additions to the trail system, mountain bikers, is also one of the most active in developing and maintaining this resource.

Specific recommendations

-We propose that the "Ledge and Airy" trail from the south parking lot entrance to the Sedona Cultural Park, along the rim of Dry Creek Canyon and connecting to Herkenham Trail just above the double switch-back be included in the system. This is not show on the Proposed Action's maps of descriptions.

-Re-align the too-steep section of "Highline" Trail where it drops off the mesa towards Baldwin Trail in order to improve the sustainability and decrease erosion concerns.

-Re-align, or provide for an alternative line, on “Hangover” Trail as it descends to the last bench traverse to the second pass through the rocks.

-Maintain the current experience provided by “Hangover” Trail. Use signage to appropriately warn users of danger created by proximity to cliff faces, but do not remove ledges that protrude into trail corridor. Consider adopting this trail as USFS Trail Classification 1 in order to facilitate this.

-Consider adopting a trail rating system to inform trail users trail difficulty. Use planned, built, alternate lines where appropriate in order to prevent the haphazard creation of easier alternatives.

-Use bicycle friendly trail construction techniques. For example, the use of rock armoring as opposed to check-dams/ wooden water bars where appropriate. Refer to best practices in the USFS Handbook and the International Mountain Bicycling Association resources.

-Assess whether it is appropriate to construct a mountain bike skills park on the Coconino National Forest. If so, find a suitable location near to a trail head and adjacent to the urban interface. Addressing this demand could mitigate the spider-web of trails in the Soldiers Wash area. See here, pages 33-39, for more information:
http://flagstaffbiking.org/wp-content/uploads/2010/03/Gravity-Fed_Mountain_Biking.pdf

-For more detail, consider our support in-full for the comments submitted by the Verde Valley Cyclists Coalition.

Thank you again for this opportunity to comment. Please feel free to contact us should you have any questions regarding this input. Please include us on any further action on this proposal via email, trails@flagstaffbiking.org and US Mail, Flagstaff Biking Organization, PO Box 23851, Flagstaff, AZ 86002.

s/Anthony Quintile

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