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Flagstaff Biking Organization
PO Box 23851
Flagstaff, AZ 86002
trails@flagstaffbiking.org

Erin Phelps
Project Leader, Flagstaff Watershed Protection Project
Flagstaff Ranger District
5075 N. Highway 89
Flagstaff, AZ 86004
Comments-southwestern-coconino-flagstaff@fs.fed.us
Sent via electronic mail

Dear Ms. Phelps-

Thank you for the opportunity to comment on the Flagstaff Watershed Protection Project Draft Environmental Impact Statement.

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. We have a successful and ongoing 11+ year relationship with the Coconino National Forest, Coconino County and the City of Flagstaff, including a Memorandum of Understanding to work cooperatively to provide for non-motorized trails opportunities in the Flagstaff area. Please see <http://www.flagstaffbiking.org> for more information on our organization.

Most of our members recreate in the forest surrounding Flagstaff. Our members will be directly affected by the results of this analysis and its subsequent decision. Please consider our comments as generally representative of our 200 + paid members’ concerns.

Importance of trails to the Flagstaff mountain biking community

Mountain biking is one of the most popular activities in the Forest surrounding Flagstaff!

It is precisely because of the quality of the trails on the Forest that this is so. The popularity of these trails is not only evidenced by the high number of mountain bikers riding on them on any given day, but also by the large amount of stewardship dedicated to the trail system by cyclists in in the greater Flagstaff area.

As a direct result of this use and stewardship many mountain bikers feel a high degree of ownership over the condition of the trail system. We have spent the past decade developing a partnership with the Flagstaff District, which has helped to foster a sense of involvement in the process with mountain bikers in the area and therefore it is important to treat the trails affected by the FWPP activities with the utmost respect.

We support this project!

We support the City of Flagstaff, the Coconino National Forest, and this voter funded initiative to protect both the City and the surrounding forest by proactively executing this and similar forest health projects.

The Schultz fire and resulting flooding demonstrated graphically how much damage can be caused by overly dense forest. The Schultz fire not only caused destruction and loss of value to private properties, it caused significant negative impacts to our trail system, which is just now beginning to recover.

We recognize the need to adjust to the temporary negative impacts of thinning and prescribed burns in order to prevent the much greater impacts of catastrophic wild fire.

We also want to sincerely thank the Forest Service for thoroughly considering our comments in response to the Proposed Action for this project! We were very pleased to see so much of our input incorporated into the Draft Environmental Impact Statement. These inclusions will go a long way towards mitigating some of the impacts of the Project's fuels treatments on trails, recreation, and view sheds.

Concerns With All Action Alternatives in the DEIS

Communication regarding impacts to user created trails not thoroughly analyzed

By rough estimates, user-created trails comprise one half to three quarters (maybe more) of the miles of trails used by the recreating public in the project area. We recognize that the Forest Service lacks the authority to protect these trails throughout the implementation of the FWPP. Despite this, these trails are an important part of the existing condition as understood by a large number of trail users.

In order to effectively accomplish public engagement, the user-created, and USFS system, trails should have been shown on each of the maps of the various treatment methods for each the Alternatives. Additionally, the specifics for on the ground impacts to these trails should have been analyzed and discussed in order for the public to be able to better understand and comment on its concerns regarding the possible effects to these

routes. As it stands, it is very difficult to assess which treatment will impact which trail(s). Although this is particularly true for user-created routes, as they are not shown on any maps, it is also true for some of the Alternatives, as the trails were only shown on a map for one Alternative.

We suggest that there may have been significantly more concern expressed and feedback elicited from the public over the impacts to the user-created trails had this information been made more clear. Although the FWPP may not be the appropriate vehicle to address concerns related to the long term plans for user-created trails, this feedback would have made clear the immediate need for the Mount Elden/Dry Lake Hills Recreation Planning and may have influenced the alternative development process.

Socio-economic impacts to recreation economy not thoroughly analyzed

Both actual and perceived changes to the trail system, as well as temporary closures, may substantially impact the recreation economy of Flagstaff. Flagstaff is home to an ever-growing number of outdoor recreation enthusiasts and businesses. Flagstaff is a destination for tens of thousands of outdoor recreationists from surrounding metropolitan areas, such as Phoenix and Las Vegas, and is also a recreation destination for many other travelers. Additionally it is because of the proximity to outdoor recreation opportunities, and the enhanced quality of life that accompanies these opportunities, that larger local employers such as W.L. Gore Associates, Flagstaff Medical Center and others are able to attract and retain many higher quality professionals. All of these things contribute greatly to the Flagstaff economy.

Without well thought out communication to the recreating public and substantial measures in place to minimize these impacts, it is possible that significantly fewer people may choose to visit the area after the project's implementation and completion. Local recreation businesses and other businesses that benefit as a result of this visitation may see a decline in revenues as a result of less visitation and as less use of the trails.

In addition, it is in part a result of this thriving economy, recreation based and otherwise, that the Flagstaff Ranger District enjoys such a high level of trails stewardship. Many of these local outdoor businesses and participants volunteer in and help to fund trails maintenance efforts. A significant percentage of the trail maintenance and construction in the area is executed by engaged volunteers and funds raised as a result of this recreation economy.

Neither the DEIS, Recreation Specialist Report, nor Economics Report addresses substantially any of the potential impacts to the local recreation economy during or following the project. It is important that the Forest Service analyze these effects in order to appropriately prioritize the need to effectively communicate and mitigate impacts to this important aspect of the local economy.

Impacts from potential loss of user engagement leading to new proliferation of user created routes not thoroughly analyzed

Although we recognize that there is difficulty in quantifying social conditions, it is important to acknowledge and attempt to control the potentially adversarial conditions that may lead to an increase in unauthorized trail construction. The current user-created trail system, although substantial, has been relatively static especially when compared to some other nearby recreation destinations (Sedona and, somewhat less recently, Moab for example). This is in part a result of FBO's engagement of various mountain bike user groups and expected future additions to the trail system as a result of the pending Mount Elden/ Dry Lake Hills Recreation Planning (MEDL). It is probable that the vacuum of trails left by the incidental obliteration of so many user-created routes and the ongoing delay of new trails planning will lead to a net increase in unauthorized routes and a significant setback in FBO's efforts to engage this local user group.

The DEIS makes only passing reference to this possibility and offers only decommissioning of temporary roads as a solution to prevent the proliferation of more user created routes.

Inadequacy of NVUM Surveys in Capturing Valid Data

Although we understand that the Forest Service is currently required to rely upon National Visitor Use Monitoring, (NVUM), surveys for data on recreational use, we want to once again express our ongoing concern with the substantial shortcomings with this process. Most use information is captured at popular trailheads. Surveying at trailheads skews user numbers towards foot traffic as those on foot typically need to drive to park near a trail. Mountain bikers, especially in a community like Flagstaff, are apt to ride from their homes and enter the trail system from myriad access points. Because of this, it is our contention that the number of mountain bikers using the trail system may be considerably underrepresented in this data.

Recommendations for the FEIS and Implementation

Prioritize the minimization of impacts of FWPP to recreation and commit to remediating the impacts quickly

It is imperative that continuing progress is made on the MEDL Project. We would also request that the Alternatives, in particular those that include substantial additions and connectivity improvements to the USFS Trail System, become public concurrently with the release of the final decision and EIS for FWPP. The importance of this to maintaining user group engagement, specifically amongst some members of the mountain bike community, cannot be understated.

Additionally, in order to further help to address this and other concerns, we recommend that the decision for the FWPP include language recognizing the substantial loss of recreational trail opportunities that will result from the FWPP implementation, and stress that the Forest Service is, to the best of their ability, prioritizing the analysis and implementation of the MEDL Project to "clean up" behind FWPP as soon as possible.

Whenever possible:

- Choose actions that reduce impacts to trails and trail users.
- Be certain that District Recreation staff are engaged throughout the implementation process and that their input is given equal weight to that of other specialists.
- Be available and respond quickly to observations, concerns and input from our organization, other recreational user groups, and private citizens with regard to recreation-based concerns throughout the implementation.
- Consider using trail building professionals to restore damage to trails that will be caused by fuels treatments, rather than depending upon logging contractors to execute this specialized work. It may be possible to require the contractors to sub-contract this work to trail crews if it is not feasible to separate this from the treatment contracts.
- If using trail professionals is not possible, be certain that the District Recreation Staff holds the logging contractors to the highest standards for minimizing impacts to trails and restoring trails in a professional and timely fashion upon completion of their treatment work.

Proactively communicate with the public throughout the implementation

Every closure and every treatment is an opportunity to engage the public in better understanding of the role of this project in the management of their public lands through interpretive signage, newspaper articles, field trips and other means of communication. Use of these methods can substantially reduce the amount of negative reaction to what will amount to shocking changes to the forest landscapes.

Commitment to Continued Partnership and Assistance

In spite of the concerns that we have expressed above, we want to reaffirm our commitment to our partnership with the USFS throughout this project. We stand ready to do our part to assist in disseminating information about this project to the cycling community and to share the concerns of the cycling community with the Forest Service.

Please let us know if there are any opportunities for us to participate in this project in manner that enhances opportunities for mountain biking.

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, TC Eberly, Melissa Dunstan

...for the Board of Flagstaff Biking Organization