

March 8, 2011



Flagstaff Biking Organization
PO Box 23851
Flagstaff, AZ 86002

Yewah Lau
Coconino National Forest
Attn: Plan Revision
1824 South Thompson Street
Flagstaff, Arizona 86001
Sent via electronic mail

Dear Ms. Lau,

Background on Flagstaff Biking Organization

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. Please see <http://flagstaffbiking.org/about-fbo/> for more information.

Thank you for this second opportunity to comment on the proposed revisions to the Coconino National Forest Management plan.

We very much appreciate that many of our first comments were incorporated into the Revised Draft. We also greatly appreciate the structure and workability of the Revised Draft. The format is easily understood and makes for a functional planning document that should be easily utilized when working on site-specific planning in the future.

We still have some concerns with regard to input that we included in our first set of comments that we feel are of exceptional importance. We are including these again, with some additional detail in hopes that they might be reconsidered. We are also including some new input not in our first letter.

More focus needed on Mountain Biking in the Sedona/Oak Creek Management Areas

Over the past decade, the Sedona area has emerged as a worldwide destination for mountain biking. 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.

The consequences of this popularity have been thrust somewhat upon the Red Rock District of the Coconino NF. We recognize the diverse, if not divergent, demands placed upon this exceedingly popular area create significant management challenges. **We stress that mountain biking is an important and valid activity upon the Sedona/Oak Creek Management Areas and that it requires management direction and support in order to facilitate responsible use.**

We would like to see more specific direction incorporating some of the previously mentioned themes for mountain bike trails. We would like to see incorporation of mountain biking generally, and freeride/downhill riding specifically, into the language for the Sedona/Oak Creek Management Areas. Any form of recreation not reasonably planned for will continue to occur with insufficient management and this has significantly more impact than well planned and managed recreation.

Some of the language on management direction for the Red Rock MA has the potential to be interpreted as being overly restrictive to implementation of trails to help address the need for more opportunities for mountain biking.

*“A variety of self-directed, day-use activities **which emphasize hiking, scenic viewing, and learning about the natural and cultural history** of the Sedona/Oak Creek ecosystem are encouraged.”*

The emphases listed above can be interpreted as relegating mountain biking to a “second-class” status to these uses.

*“Recreation opportunities are **primarily nature based...**”*

Although we in no way see a conflict between nature and mountain biking, others may argue that this is the case and may draw attention to this.

We cannot stress enough that there is a significant management issue on the Red Rock District, which has arisen as a result of a substantial growth in demand for mountain biking opportunities in this area. This is coupled with a lack of strong direction supporting adequate resources to provide for a reasonable level of mountain biking opportunities. The unique landscape in this area, and specifically the abundance of sandstone, makes for a rare and highly desirable mountain biking experience not found in many other environments throughout the world. As much as it is important to “recognize the strong demand for inspirational and contemplative benefits in the natural landscape and provide settings that contribute to these benefits,” it is important to recognize the substantial and growing demand for bicycle trails that sustainably utilize some of the unique geological features found in this area.

The Sedona/Oak Creek Management Area has also been *de facto* host to several “underground” events without Forest Service permission. We in no way condone this, but as currently managed, there exist no channels for obtaining appropriate permits for competitive events, such as mountain bike races, or large group activities, such as guided rides as part of a mountain bike festival. Once again, we recognize the diverse, if not divergent, demands placed upon this exceedingly popular area create significant management challenges, but we feel that competitive and/or large group events **are** appropriate within the Sedona/Oak Creek Management Area, perhaps with specific participant caps and yearly limitations on number of events, and that a significant need for the Forest to be able to host such events exists.

Please highlight the need for more opportunities for mountain biking in the Sedona/Oak Creek Management Area in the new Forest Plan.

Opportunities for trail additions to the Fort Valley/Mount Elden Management Area

Included in “Management Areas of Public Interest”, on page 120 of the Revised Draft:

“The trail system is stable and does not increase significant (*sic*) in mileage over time.”

We believe that there is a need, and that it is appropriate, to consider potentially significant trail additions to the Dry Lake Hills trail system. Specifically, it may be appropriate to consider the addition of some single-use trails to address the demand for freeride and downhill mountain bike trails and some single use equestrian-only routes in order to address the potential for user conflicts.

Please remove this potentially limiting language to allow for consideration of the addition of routes as necessary and appropriate.

Lift assisted mountain biking and other summer uses at Arizona Snowbowl

Currently, there is legislation that has been introduced in the House of Representatives and the Senate, the Ski Area Recreational Opportunity Enhancement Act, which would facilitate use of ski areas beyond winter sports. (H.R. 2476, S.607)

As is evidenced by an informal petition Flagstaff Biking Organization organized, there is high demand for this facility. Our petition is currently in excess of 1800 signatures. The wording of our petition was contained in our last comment letter.

We would like to see language in the revised Plan that calls for using opportunities such as the one that the Arizona Snowbowl presents to focus appropriate recreational opportunities to already highly impacted areas with appropriate facilities and features. Focusing some dispersed uses to the Arizona Snowbowl, and potentially to other developed and/or special-use permitted places could help to mitigate some of the impacts to other resources, such as wildlife, and to alleviate some user-conflict concerns.

Please include language in the “Guidelines for Recreation Special Uses” section encouraging the direction of some dispersed recreational uses to developed and/or special-use permitted areas.

Full utilization of the USFS Trail Classification System and Trail Construction Guidelines

As we mentioned in our first letter, we think that it is important that the new Plan recognize and encourage the use of the full range of the USFS Trail Classification System. Many site-specific trail planning projects on the Coconino National Forest have not specified an appropriate trail management class, nor have these planning projects called out specific “designed” and “managed” uses. These are very important tools in communicating to the public and USFS employees how trails are meant to be built, maintained, and managed. The lack of this direction has been the cause of miscommunication and misunderstanding between our organization (and other groups) and USFS employees. These misunderstandings can be avoided in the future if these tools are implemented in future site specific planning.

Please include language requiring the use of the of trail classification system and trail construction guidelines in any site-specific planning for trails.

Choice of Language is Important!

Included in “Forest Wide Management”, on page 83 of the Revised Draft:

“Activities such as *mountain-biking, geo-caching, and rock climbing* do not significantly detract from the natural character of the Forest, impact resources such as aesthetics, soils, vegetation, and wildlife, or contribute to user conflicts.”

Specifically referencing “mountain-biking, geo-caching, and rock climbing” seems to imply that these uses might necessarily be more harmful to the values mentioned than other uses. We would suggest that the differences in impacts between mountain biking and, for example, hiking are inconsequential. Rather than naming “mountain biking, geo-caching and rock climbing” we would ask that the implication of preference for other uses be eliminated by rephrasing this sentence as: “Recreational activities do not significantly detract from the natural character of the Forest, impact resources such as aesthetics, soils, vegetation, and wildlife, or contribute to user conflicts.”

We suggest that care be taken throughout the Plan Revision process to avoid inadvertently casting mountain biking in a negative light in this manner. It is rarely necessary to “call out” specifics like this unless the point of the direction within the Plan might otherwise be lost.

Please allow for Special Event Permitting in the Dry Lake Hills

Included in “Forest Wide Management”, on page 95 of the Revised Draft:

“Outfitter/guide activities or group activities should not generally occur in Deadman Wash, **Dry Lake Hills**, Walnut Canyon from Fisher Point east, and Pumphouse Wash.”

Given the Dry Lake Hills proximity to venues that are either on or off the Forest and suitable for staging large events, the trails in the Dry Lake Hills are ideal for use for occasional special events such as mountain bike races. Including this direction in the guidelines is unnecessary. Several Special Use Permits for events in the Dry Lake Hills have been issued and successfully executed in this area to the benefit of the local community with very little negative environmental or social impact. Both the Mountain Bike Association of Arizona and the Northern Arizona Trail Runners have held events on these trails within the last year.

Please remove “Dry Lake Hills” from this sentence.

Strong Opposition to the “Whitehorse” and “Bismark” Potential Wilderness Areas

Although we are aware that these two Potential Wilderness Areas will most likely not be recommended in the Preferred Alternative in the DEIS for the Revised Plan, we must state that we are strongly opposed to these areas being recommended as Wilderness!

We have collaborated for several years in the construction of the Arizona Trail throughout the Coconino National Forest, including the section that is aligned through the “Whitehorse” and “Bismark” PWAs. This section of trail has quickly become one of the most favorite routes for mountain biking in the Flagstaff area. The opportunity to ride at high elevation, through aspen and limber pine forests, is not available anywhere else in Northern Arizona. The opportunities for long distance adventure single track riding offered by this section of trail is unparalleled by any other route nearby.

Please *do not* recommend these areas for consideration as Wilderness!

Once again, thank you for the opportunity to comment throughout this ongoing. Please contact us if you have any questions regarding the input we have provided via email or phone (928) 526-7704. Please include us on any further action on these proposals via email: anthony@flagstaffbiking.org, and via US mail at Flagstaff Biking Organization, PO Box 23851, Flagstaff, AZ 86002.

Regards,

s/Anthony Quintile

For the Board of Flagstaff Biking Organization

From page 94—Desired conditions for recreation special use.

Large group gatherings and recreation events are discouraged outside of areas that have already been analyzed for resource issues or suitably developed sites. These sites provide a range of opportunities from a natural, “outdoor” experience to commercial amenities for visitor comfort. Applicants are encouraged to use non-National Forest System land for staging when possible. Pre-approved sites are generally areas that are compatible with use by the general public and are identified based on their ability to support large group activities with minimal resource impacts. They do not have long-term evidence of erosion or invasive exotic species as a result of special use activities. In general, events occur where they will not disrupt the general public’s use of the land.

anita 3/14/11 5:05 PM
Comment: I think they left out NOT.