

July 8, 2011



Flagstaff Biking Organization
PO Box 23851
Flagstaff, AZ 86002

HDR/eM
ATTN: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Suite 200
Englewood, CO 80112

To the staff of HDR/eM,

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. ***We submitted comments during the first call for input on the Walnut Canyon Special Study Area, and we stand by all of that input.*** We would like to emphasize our continued concern with certain possibilities presented for management of this area.

Bicycling Access must be maintained, and improvements for bicycling should be allowed in the future.

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. 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. Certain designations could create insurmountable barriers to this.

Difficulties with Park Service management

We have strong concerns with the designation of any of these lands as National Monument or National Park. 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, however these changes are not currently in place, and are still significantly more restrictive than the management options available under US Forest Service policy. **We ask that the final Study recognize and discuss any administrative and/or legislative difficulties for bicycle access that might be created by Park Service, or other, management options presented by the study.**

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 to 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-

s/Anthony Quintile

Anthony Quintile, for Flagstaff Biking Organization Board of Directors

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