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

Michael C. Diem  
District Ranger  
Moab/Monticello Ranger District  
PO Box 386  
Moab, Utah, 84532  
Sent via electronic mail

Dear Mr. Diem-

Thank you for the opportunity to comment on the Proposed Action to change the trail system in the La Sal Mountains.

### **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 10+ 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.

Many of our members recreate in Moab. Moab is recognized as one of the most popular mountain bike destinations in the world. The relatively close proximity of Moab makes it an extremely popular recreation destination with mountain bikers in Northern Arizona. Our members will be directly affected by the results of this analysis and its subsequent implementation. Please consider our comments as generally representative of our 200 + paid members’ concerns.

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.

It is our understanding from information brought forth in a meeting with local trail users on June 29<sup>th</sup> that an Environmental Assessment (EA) will be the chosen NEPA vehicle for this process, so our comments are couched in that premise.

### **Concerns with the Proposed Action's Purpose and Need**

While we commend the District's recognition of the need for an expanded trail system in order to help to proactively mitigate the potential for genuine user conflict, we question whether there is a significant existing user conflict issue at this point. We do recognize that the use by mountain bike riders on some of these trails has increased substantially over the past decade, primarily as a result of the popularity of the Burro Pass and Hazard County Trails as part of the "Whole Enchilada" ride, and that this could be contributing to decreased user satisfaction on the part of other user groups, but we are concerned that the District has perhaps over-emphasized this as true user conflict.

We ask that the District discuss its data on reported user conflict incidents thoroughly in the Draft Environmental Assessment.

Also, the Purpose and Need section of the Proposed Action (PA) states:

“Impacts to forest resources are occurring as users are creating unauthorized "connector" trails to create loops.”

...and...

“With increased recreational use of these trails and new forms of use becoming popular the Forest Service is proposing to adjust the designated non-motorized trail system to provide for enhanced recreational opportunities that forest users are looking for while minimizing trail conflicts and the potential for safety concerns as well as reducing the impacts of recreational trail use to forest resources.”

...but then the PA goes on to close routes to bicycles and add very little in the way of routes that would address these additional and new demands. Our further comments will elaborate on our recommendations to remedy these disparities.

### **We agree that the current trail system is inadequate in addressing the need for recreational opportunity**

- 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 might lead user conflict concerns.***

As the trails in the La Sal Mountains 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 La Sal Mountains has grown as well. More users on trails invariably will lead to increased opportunity for greater numbers of encounters, and potential for user conflict. The addition of 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 trails to the system, and re-routing existing trails where necessary to introduce 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. Addition of appropriate trails will address this need. Addressing this need will minimize the perception amongst some users that they need to create new trails to provide for this connectivity.

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

As riders and equipment have increased in capability, the demand for steeper, rockier trails has increased substantially. The Purpose and Need section of the PA recognizes the need for providing for "new forms of use." We hope that this statement is a nod to the need for downhill or "freeride" mountain bike trails.

This type of mountain biking has become exceptionally popular over the last decade. Far from a fad, many riders are beginning to expect some trails to incorporate above-grade features including drop-offs and jumps. Addition of this type of trail will address this need. Addressing this need will minimize the perception amongst some users that they need to create new trails to provide for this opportunity.

This type of riding also appeals to younger riders. Similarly to BMX (Bicycle Moto-cross), this segment of cycling has a “cool factor” that drives kids to this healthy lifestyle. Working towards incorporating this type of trail into the La Sal Mountain trail system could be helpful in achieving goals set forth in the Forest Service’s “More Kids in the Woods” program.

**The Proposed Action fails to adequately increase the trail system mileage enough to address the increase in demand**

The PA adds 14.1 miles of new trail for all non-motorized users, closes 13.8 miles of existing system trail to bicycles and obliterates another 10.7 miles of user created trails, for *a net loss of 10.4 miles of trails to bicycles.*

The PA recognizes the need for an expanded trail system, as cited above:

“With increased recreational use of these trails and new forms of use becoming popular the Forest Service is proposing to adjust the designated non-motorized trail system to provide for enhanced recreational opportunities that forest users are looking for while minimizing trail conflicts and the potential for safety concerns as well as reducing the impacts of recreational trail use to forest resources.”

In order to adequately address this increase in demand, in large part presented by the increase in bicycle use, it will be necessary to increase the trails system mileage available to bicyclists, not decrease it.

Although we in no way condone the construction of user-created trails, it is important to recognize the need for expanded opportunities that such trails represent.

Please recognize and consider the specific additional routes that are being proposed by local mountain bikers, in the Draft EA.

**The Manti La Sal Forest Plan calls for pro-active management of dispersed recreation**

The Manti La Sal Forest Plan states:

“Recognize the significance of recreation in proximity to population centers and national attractions”

and...

“Offer a broad range of dispersed and developed recreation opportunities by providing appropriate recreation experience and setting levels.”

and...

“Design interpretive service programs where it will help resolve management problems, reduce management costs and obtain visitor feedback, increase public understanding of Forest Service management, enhance visitor use, and provide safe use of the Forest.”

It is certainly appropriate and necessary for the Moab District to be proposing changes to the trail system in the La Sal Mountains. It is also important that the District recognize the need for additional mountain bike routes presented by the proximity of these trails and proposed trails to one of the most popular mountain biking destinations in the world.

### **Cooperation from the mountain bike community and other trail-users**

It is our understanding that this PA does not incorporate the significant contribution of recommended trails with GPS mapping submitted by local mountain bikers and Moab Trail Mix during pre-scoping for this Proposed Action.

It has been our observation through our 10+ years of partnership with the Coconino National Forest that the agency will achieve significantly greater success with far fewer resources when it makes an in-earnest effort to take recreational users' specific concerns to heart. This approach leads to cooperative management through volunteerism, “self-policing” by users and significantly greater buy-in to closures and other on-the-ground management changes. Failure to properly recognize and consider citizen input into Public Lands Management will have an opposite effect of creating animosity with said users leading to continued proliferation of user-created trails, very little compliance with even appropriate management changes and closures, and the need for additional law enforcement.

We believe strongly in the concept of cooperative management of public land. This PA is an opportunity to foster a much stronger relationship with several recreational user communities, if it is properly executed. These relationships can be effectively leveraged to help to construct and maintain an expanded trail network.

Please consider all of the specific comments submitted by Trail Mix, Moab Trails Alliance and local mountain bikers as their input is the best available knowledge on the true “need for change” in recreation in the La Sal Mountains.

### **Specific recommendations**

**-Please include an Alternative in the EA that shows all trails additions proposed in response to the Proposed Action, and the maximum number of trails open to mountain bikes.** Federal regulations require that a proper NEPA analysis include a reasonable range of alternatives. As noted, the Proposed Action reduces the miles of trails available to mountain bikes in the La Sal Mountains where the addition of more trail is

actually appropriate to address the Purpose and Need as expressed in the document. Please recognize this with an Alternative that strongly acknowledges this need with the liberal inclusion of trails open to mountain bikes.

**-Please do not close South Mountain/Pack Creek#5075, any of South Mountain #5029, Doe Canyon #5100 or Pole Canyon #5035 trails to bicycle use!** These trails are sparsely used and there is virtually no chance of user conflicts occurring to any substantial degree. These trails are exceptionally important to some cyclists as they provide a remote, backcountry exploration opportunity. Also, with the addition of the trail from Medicine Lake to the south, these trails provide for a phenomenal long distance loop around South Mountain. We are a bit at a loss as to why these trails would be closed to bikes. Our assumption is that perhaps the intent would be to provide for a hiking/horseback opportunity removed from cyclists. We do not see that any substantial number of hikers or equestrians would make the significant trip from the only nearby population center to the far side of the La Sal Mountains to use this trail in order to get away from bicycle riders. This action will not address user satisfaction concerns that are present on the “front” side of the range.

For what it is worth, we have first hand knowledge that some of these trails were “re-opened” by bicyclists over a decade ago as they had fallen into complete disuse until that point in time.

**-We strongly support many of the specific proposed routes in the PA!** There is some good thought in the creation of loop opportunities for multi-use trails. The alignment of these routes with respect to contour should be carefully reviewed. In our experience, we have been “stuck” with corridor alignments determined by NEPA decisions that severely limited our ability to layout sustainable trail on the ground. Several of the proposed trail corridors follow fall line, which makes for unsustainable tread. **Consider reviewing these alignments to allow the corridor to more closely follow the contour of the landscape.**

**-Consider the need for re-alignment of existing system routes to improve the sustainability and enjoy-ability of these trails.** This PA is long overdue and is a prime opportunity to correct some of the issues with trails that were haphazardly placed by shepherders over 50 years ago.

**-Generally, use best practices as called out by USFS Trail Construction standards, the International Mountain Bicycling Association (IMBA) and others, for sustainable, or at least maintainable, trail construction.** Please include designations for Trail Classifications, (1-5), and other specific guidelines and standards for construction and maintenance of these trails in the Draft EA. It should be noted that proper layout with an eye towards managing for the interactions between different user groups can help to mitigate user conflict concerns. Proper management of design parameters such as line-of-sight and speed-calming features can create trail flow that may alleviate poor user interactions.

**-Strongly consider kiosks and signage that outline an appropriate shared-use trail ethic.** Consider consulting with Ride With Respect, based in Moab, for strategies in implementing this. This organization has had great success in educating the users of the Sovereign Trail System, which mixes quad, motorcycle, mountain bike, hiker and some equestrian use on one relatively small, high-use trail system. We respect that the La Sal trail system has seen a significant increase in use over the past decade, but this level of use is relatively small in comparison to other trail systems throughout the country. Successful management strategies for mitigating user conflict exist that stop significantly short of closing trails to specific users.

**-Consider single-use downhill mountain bike only trails as an appropriate management tool to provide for the downhill/freeride experience being sought by so many riders.** This approach can compliment some of the proposed foot/horse only trails contained in the PA. Also, by designating some trails in this manner, other users can actively choose to avoid these routes and potential conflict. These trails could be ordered, managed or recommended as single use.

**-Please be sure that your “No Action” Alternative in the EA reflects user created trails that currently exist on the ground.** It is important to acknowledge the existing condition in full in order to effectively analyze the need for change.

-Any seasonal closure of trails should be to all users if any. If bicycles are believed to have the potential to damage tread because of wet soil conditions, it is certainly the case that horses and hikers will also cause similar damage. **We suggest that the District assess trail conditions each season, and that these trails be opened, or kept closed, based upon actual conditions and not based upon an arbitrary date.**

**-For more detail, consider our support in full for the comments and recommendations submitted by Trail Mix, Moab Trails Alliance, local mountain bikers and the International Mountain Bicycling Association.**

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](mailto:trails@flagstaffbiking.org) and US Mail, Flagstaff Biking Organization, PO Box 23851, Flagstaff, AZ 86002.

*s/Anthony Quintile*

Anthony Quintile, for the Board of Flagstaff Biking Organization  
(928) 526-7704