

March 19, 2014



Flagstaff Biking Organization
PO Box 23851
Flagstaff, AZ 86002

Vern Keller
Coconino National Forest
Attn: Plan Revision
1824 South Thompson Street
Flagstaff, Arizona 86001
coconino_national_forest_plan_revision_team@fs.fed.us
Sent via electronic mail

Dear Mr. Keller,

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 third opportunity to comment on the proposed revisions to the Coconino National Forest Management plan.

We very much appreciate that many of our first and second comments were incorporated into the Draft. We also greatly appreciate the structure and workability of the 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 are mostly pleased with the contents and direction of the Plan!

Forest Wide Plan Comments

We are generally in favor of Alternative B, with changes and adjustments as referenced below. In general, unless the presence of bicycles can be demonstrated to have significantly adverse impacts to resources or social conditions on the Forest, or bicycle use is prohibited by law, we support continued access for bicycles.

Walker Mountain Proposed Wilderness Area

Wilderness should only be recommended in rare instances as Wilderness is an extremely restrictive designation that prohibits many recreational uses, including bicycling. Walker Mountain PWA contains the Walker Basin Trail which has been used by bicycles for backcountry exploration, camping and access. Many cyclists have expressed the desire to see a single track connection between Flagstaff and Sedona. With some additions to the system, the Arizona Trail connecting with Walker Basin Trail may be one of the only ways to achieve this. Given that a string of already existing Wilderness Areas line the Mogollon Rim from Perkinsville Road, around Sedona and south to the Verde River, options for ascending or descending the rim on single track trails is virtually nonexistent. Designating this area as Wilderness would continue to contribute to a cumulative loss of opportunities to ride trails in, and through, the Mogollon Rim areas surrounding Sedona. We ask that this PWA not be included as a Recommended Wilderness Area in the final Plan. Although we recognize that it is outside the scope of this Plan Revision Process, we might support different Congressional designations, (National Recreation Area, National Conservation Area), to protect this and other PWAs contained in the various Alternatives should such proposals be made.

Recommended Wilderness Area Management for Mechanized

We support that any RWAs be left open to bicycle access if such access is currently allowed until Congress sees fit to designate these areas as Wilderness.

Clarification of Goshawk Prescriptions

Prescriptions for recreation Special Uses in Goshawk habitat, specifically recreation events, should be made clear. Currently implementation of restrictions to certain types of recreational use, such as mountain bike races, has been subjective and inconsistent, with permits for events issued one year and not the next based upon the discretion of different District biologists. It is our view that this policy should be exceptionally liberal, as goshawks are neither Threatened nor Endangered, and recreation is not widely recognized as having an adverse impact on these animals' ability to thrive.

Bicycle Impacts in Biological and Geological Areas

The DEIS fails to provide adequate analysis linking bicycling to adverse impacts in Botanical Areas and Geological Areas. Some of the language in the DEIS seems to make assumptions about differences between the impacts of bicycle tires and hiking boots that may not be based on any sound science or research, but rather in subjective observation. Although we do not necessarily support the wholesale allowance of bicycles in these areas, we think bicycles should be allowed unless site-specific analysis directly demonstrates that bicycles have significantly more adverse impacts to resources or social conditions than other similar uses. We support the Alternative D approach of restricting bicycles to designated trails, rather than restricting bikes altogether, as a mitigating factor for impacts to soils and plants.

Mitigate Impacts to Trails and Scenery Caused by Forest Health and Other Projects

Please include language that sets Standards and Objectives for minimizing the impacts of Forest health and other projects to recreation resources, specifically trails.

Some examples:

- Do not convert purpose-built single-track trails to roads for timber extraction or other projects.
- If a road-to-trail conversion has been utilized for timber extraction, appropriate measures should be implemented to convert these routes back to trail after a project is completed.
- Slash piles should not be located on top of trails
- Trees should be marked on the side facing away from roads and trails.

Single-use Trails

We are very happy to see the option for single-use trails carried forward! Although we strongly support that most trails should be open to as many user groups as are manageable, there are situations that warrant single-use and purpose built trails. We want to point out that this would not only apply to bicycles, but potentially equestrian trails and maybe others. We fully support this language:

“Consider single-use trails (as opposed to multiuser trail designs) to accommodate varying user experiences where trail design features cannot be provided to mitigate user conflicts or provide for a sustainable recreation setting.”

Trail Terminology

The use of the word “features” in the following sentence should be changed to “**structures**”. A trail structure would mean a rolling grade dip or tread armoring. A feature would imply a jump or other rideable “stunt”.

*“Consider single-use trails (as opposed to multiuser trail designs) to accommodate varying user experiences where trail design **features (should be “structures”)** cannot be provided to mitigate user conflicts or provide for a sustainable recreation setting.”*

Management Area Specific Comments

Desired Conditions for Fort Valley/Mount Elden Management Area

The Plan says:

“The trail system is stable and does not increase significantly in mileage.”

We hope that this direction will not be working against the need for expansion in this system that is currently under review in the Mount Elden Dry Lake Hills Recreation Planning NEPA. The Mount Elden Area is Flagstaff’s “back yard” and is much in need of additions to the trail system to address the ongoing increase in growth of demand for recreational trails opportunities. Please refer to [our comments submitted in response to the MEDL Recreation Proposed Action](#).

Guidelines for Pine Belt Management Area

Please add the following or similar:

“Work with Coconino County Parks and Recreation and other local stakeholders to develop a stacked-loop trail system emanating from Fort Tuthill County Park to address the need for large competitive non-motorized trail based events.”

We were participant stakeholders in the Ft. Tuthill Master Plan Revision process, and we are otherwise aware of the substantial and growing demand for larger scale competitive and participatory events that utilize trails. There are very few places that can serve as staging areas for trails-based events. Various Forest planning documents, including this one, encourage staging large events off the Forest. Ft. Tuthill provides a perfect location to stage very large events, but it lacks access to enough quantity and diversity of trails to support these events.

Among the various aspects of the US Forest Service’s mission exists this:

“Helping States and communities to wisely use the forests to promote rural economic development and a quality rural environment.”

Working with CCP&R to provide a venue and trails to help accommodate large recreation events would greatly help to foster the recreation economy of Northern Arizona.

Desired Conditions for Oak Creek Management Area and elsewhere throughout the document

Where opportunities exist, please recognize “bicycles” specifically as a desirable mode of alternative transportation.

*“Alternative modes of transportation, **such as bicycles**, that reduce automobile dependency and traffic congestion are encouraged.”*

Desired Conditions for the Sedona/Oak Creek Management Area and Sedona Neighborhoods.

Although we *very much appreciate* the changes that were made from the first draft, language such as...

“Recreation opportunities are primarily nature based, and they exist for individuals, families, or small groups. There are opportunities for experiencing solitude, scenic beauty, and natural quiet.”

...fails to acknowledge that this area, (and others on the Forest), should, and do, also provide opportunities for challenging users’ abilities. Activities such as mountain biking and rock climbing allow people to seek levels of fitness and aptitude that have a high social value that require the availability of certain landscape features. It is important that the Plan reflects these values in addition to things like solitude, scenic beauty, natural quiet, etc. Recognizing this need can help to guide planning for appropriate types of trails and signage to mitigate safety hazards, reduce illegal trail construction, reduce user conflicts and generate better buy-in from user groups.

We would like to see language recognizing that slickrock sandstone areas throughout the Sedona/Oak Creek and Sedona Neighborhoods Management Areas are especially valuable for cross-country mountain bike travel. Should further area-restrictions be implemented on bicycle travel in the greater Sedona area, it would be especially important to recognize the unique opportunity that slickrock provides for exploration and challenge on a bicycle.

Once again, thank you for the opportunity to comment throughout this ongoing process. 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