

April 20, 2013



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.

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.

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 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 most mountain bikers in the area. In order to facilitate the continuation of this goodwill, it will be important to treat the trails affected by the FWPP activities with the utmost respect.

As important as it is to do a thorough job in addressing Forest health issues that could lead to catastrophic fire and flooding that could result in the destruction of these trails and the community of Flagstaff, it is also important that these activities impact the trails as little as possible.

We support this project!

We support the City of Flagstaff and Coconino National Forest in their 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 urgent need to adjust to the changes inherent in thinning and prescribed burns in order to prevent the much greater impacts of catastrophic wild fire.

Suggestions for consideration in the Draft EIS

The Proposed Action States:

“Harvesting activities would avoid forest system trails, if possible. If it is determined necessary that a trail must be used as a temporary road or skid trail, then the trail would be restored to USFS standards post-treatment.”

We appreciate the intent to restore trails post treatment, however we **strongly object to the use of any system trail that was originally purpose-built as a recreational single-track trail** for “temporary use as a road or skid trail”.

Many of the purpose built single-track trails on the Flagstaff District were hand built by volunteers. Purpose-built single track inherently possesses characteristics that cannot be restored once converted to road. Examples of this would be close proximity of certain

trees and rocks, and the radii of turns. Although it may be possible to restore a converted single track trail to “USFS standards”, it would not be possible to restore all of the important characteristics that made the trail desirable before conversion.

We understand that some trails are located on old road beds, and these routes are preferable for re-use as roads for this project. We understand that this may be the best option in some situations, but we suggest that this should be avoided if possible.

We ask that any trails located on old road beds that are converted to temporary roads are given the utmost care in their conversion back to single-track, and that adequate funding is allocated to accomplish this restoration to the highest standard. We have been witness to poorly executed attempts at this process before. As some of the trails that might be affected are among the most valued in the Country, namely the Arizona National Scenic Trail, we feel that that this process warrants a high level of attention to detail.

This stated, we also recognize that it may be expedient to collocate road beds along the Flagstaff Loop Trail alignment that we have proposed for inclusion in the forthcoming Mount Elden Dry Lake Hills Recreation Planning, (MEDL), as this proposed alignment would be for Class 4 trail which would benefit from a wide road bed type corridor.

Similarly, we recommend that the District consider any other opportunities to utilize either clearances or impacts that result from the Flagstaff Watershed Protection Project in the analysis and/or implementation of trails in the forthcoming Mount Elden/Dry Lake Hills Recreation (MEDL) Planning as appropriate.

Please try to coordinate the implementation of the FWPP activities with the MEDL Recreation implementation as much as is feasible. There may be aspects of MEDL that are more urgent, and if at all possible we would like to see FWPP projects scheduled with this urgency in mind. This coordination to expedite aspects of MEDL will help to keep certain people in the mountain bike community engaged and enthusiastic about working with FBO and the Forest Service.

We appreciate the other language in the Proposed Action that recognizes the need to impact trails as minimally as possible in both the long and short term through prescriptions for “feathering” thinning activities, involvement of the District Trails Coordinator, etc. Please reflect as much direction to this effect in the DEIS as is possible.

Specifically, we would appreciate attention being drawn to the impact to scenery caused by marking trees with spray paint for thinning. It is our understanding that the marked trees are the ones that will not be removed. If this is true, please consider providing direction that these marks face away from trails and roads. We are frequently asked about these marks. People definitely see them as an eyesore.

The Proposed Action states:

“Special-Use Events Coordinated efforts would be made with sponsors of

recreational special-use events (i.e. running or mountain biking races) to minimize the impacts of such proceedings within the project area during forest restoration activities.“

This language is confusing. We would like clarification.

On this issue, we would hope that the language would reflect the desire to accommodate and continue to allow Special Use Events during this project, even to extent of adjusting operations to allow an event to occur. As an example, most Special Use Events occur on weekends. If contractors would be working only on weekdays, perhaps equipment and slash piles could be left in such a manner as to not interfere with events.

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

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