

September 25, 2007

Mr. William Wellman
Superintendent
Big Bend National Park
PO Box 129
Big Bend, TX 79834

Dear Superintendent Wellman:

In reviewing the Centennial Initiative projects for Big Bend National Park, announced on August 2007, Public Employees for Environmental Responsibility (PEER) has concerns about one project – the funding of new construction for a bicycle trail in the backcountry of Big Bend. These concerns are detailed below:

1. Recommended Wilderness

In a letter to PEER dated October 4, 2005, former Director Fran Mainella wrote –

“NPS policies direct that lands that have been formally proposed by the NPS Director or Secretary of the Interior, or recommended by the President to Congress for designation as wilderness, will be managed with the expectation of eventual designation as wilderness. Therefore, NPS lands that are proposed or recommended for wilderness designation are inappropriate for bicycle use designations until such time as Congress renders their decision.”

For Big Bend, the President sent the governing recommendation to Congress on May 11, 1978. That recommendation was for 538,250 acres of wilderness and 44,750 acres of potential wilderness, on a map #155-20,004-D, dated January 1978. The May 1978 presidential recommendation superseded the presidential recommendation of July 1974 (533,900 acres of wilderness; 25,700 acres of potential wilderness; map #155-20,004C, dated January 1973). **We seek your firm and unequivocal assurance that the route proposed for prospective bicycle use is not located in any of the areas depicted as recommended wilderness/potential wilderness on map #155-20,004-D, January 1978.**

2. Special Regulation

As you know, any proposed bicycle route outside of the development zone, as designated in the current park General Management Plan, other than on administrative roads, requires promulgation of a special regulation at 36 CFR. Please advise us whether you plan to pursue such a special regulation.

3. New Construction

PEER is concerned about any proposal that requires new construction of a trail for bicycles. Before the NPS builds new infrastructure in any park, the NPS must first take good care of its existing infrastructure. There are more than 200 miles of existing trails in Big Bend that the NPS struggles to maintain with inadequate funding and staff. Even with a “partnership” with the International Mountain Biking Association (IMBA), the NPS would still have to produce \$60,000 as its share of trail construction funds, and additional sums for future maintenance and compliance.

4. Special Trail Design Requirements

PEER does not believe that every form of recreation is appropriate in the national parks. The Organic Act, in whose name the Centennial Initiative purports to function, mandates enjoyment of resources that the NPS has conserved in an unimpaired state. PEER was disturbed to learn that in the February 2006 park meeting, IMBA representatives spelled out the terms of the trail that they wish the NPS to construct. Among IMBA’s terms, trails should not have water bars, trails should zigzag, i.e. not just connect point to point, but provide challenge and thrill.

The NPS should not construct facilities specifically to accommodate the thrill-seeking needs of users willing to make contributions to the park. To use Centennial Initiative funding simply because there is a willing “partner” (IMBA) who advocates the project, hardly seems meritorious. After all, Director Bomar has said that the Centennial Initiative “will rate second only to the creation of the National Park Service itself.” A trail for mountain bicycles hardly meets that lofty goal.

We are concerned that Big Bend betrays the potential of the Centennial Initiative by pursuing a project like this.

We look forward to your response. If you have any questions, please contact me at 202 265-PEER.

Cordially,

Jeff Ruch
Executive Director