

March 17, 2011

Mr. William Wellman
Superintendent
Attention Multi-Use Trail
Big Bend National Park
PO Box 129
Big Bend, TX 79834

Dear Mr. Wellman:

The National Park Service (NPS) invited public comment on an Environmental Assessment (EA) for a proposal to construct a ten-mile mountain bicycle trail in the backcountry near Panther Junction within Big Bend National Park. Public Employees For Environmental Responsibility (PEER) endorses Alternative A – “No Action” as the environmentally preferable and least costly alternative. We fundamentally dispute the unsupported assertion in the EA Introduction that none of the alternatives, including construction of the new ten-mile bike trail, would impact park resources and values.

Reasons PEER Endorses Alternative A

PEER endorses Alternative A for four reasons:

1. Priorities

Big Bend National Park already contains over 200 miles of constructed trails that the NPS struggles to maintain with inadequate funding and trail crew. The last information we possess is that the park’s trail crew is not base-funded but must compete for limited funding on an annual basis. Either Big Bend is unique among parks in having no backlog of deferred maintenance needs, or is awash in excess funds to consider constructing a new ten-mile trail. The proposal is unwise because the NPS would direct strained resources away from already identified priorities to a project of suspect merit.

The NPS is not the real proponent of this project. The real proponent is the International Mountain Biking Association (IMBA) and its local affiliate, the Big Bend Trail Alliance. It is not the NPS that developed this idea, based on park planning, but IMBA who proposed it to the NPS. The EA is a tool of IMBA’s bidding. While the EA title describes a “Multi-Use” trail, the text reveals that this is all about mountain bicycles. IMBA, a special interest user group, has set the NPS’ priorities here, not common sense.

IMBA’s offer of funding is hardly a justification or defense. Prospective donors should never be in the driver’s seat. At Big Bend, the NPS developed an array of plans. None proposed a mountain bicycle trail in the Grapevine Hills. NPS planning is short-circuited

by the IMBA proposal, resulting in a “He who pays – plays” dynamic. That is not how the NPS should develop or manage parks but is, instead, a blueprint for their degradation.

2. No Need

There is no need to provide this kind of recreational opportunity within the backcountry of Big Bend National Park. Over 300 miles of the park’s dirt and paved roads, including the rough Black Gap Road, are open to use by mountain bicycles under NPS rules at 36 CFR 4.30(a). Apparently, these opportunities are insufficient for IMBA and the NPS. In addition, 900 miles of old ranch roads and single track trails are available to mountain bicycles in adjacent Big Bend Ranch State Park, and hundreds of miles more in Terlingua Ranch, a large subdivision.

The EA makes no mention that these opportunities afford a real and more attractive alternative for mountain bicycles than a new ten-mile trail in Big Bend. The EA fails to take into consideration that Big Bend National Park, though priceless, is not an island. Large tracts of land that abut the park afford more than enough mountain bicycling. Or, maybe there is no such thing as “enough?”

3. Precedent

As just described, the proposed Big Bend trail is not really about affording a new recreational opportunity for mountain bicycles. Abundant mountain bicycle opportunities exist all around Big Bend. This proposal is literally about breaking new ground in the backcountry of the national park system. IMBA has long sought this prize and Big Bend is the first to bite. The paltry opportunity afforded by the proposed trail is not enough to justify IMBA’s intense dedication to this proposal. There are bigger fish to fry here.

Despite the drift of the research in the EA on mountain bicycles in the national park system, **there is not a single park that has constructed from scratch a trail in undeveloped backcountry to accommodate mountain bicycles.**

The EA correctly points out that several parks allow use of mountain bicycles on existing trails outside of the park’s developed zone:

- Two parks – *Golden Gate National Recreation Area* and *Saguaro National Park* promulgated special regulation, as required by 36 CFR 4.30(b);
- At least two other parks have proposed special rules to allow such use and that have sat in limbo for four years at the NPS Washington Office – *Delaware Water Gap* and *Big South Fork*;
- One park allows mountain bicycles on trails - *Mammoth Cave* - even though a special rule has not even been proposed, let alone adopted in final by the NPS. (That park calls it a ‘demonstration project’ although it has gone on for almost a decade. This conduct displays how the NPS openly violates its own rules in the face of pressure from IMBA, and its local affiliate.); and

- Several parks allow bicycle use on administrative roads, which is permissible under 36 CFR 4.30(a). Among these is *Redwood and New River Gorge*. That kind of mountain bicycle is not equivalent of the Big Bend proposal.

The EA incorrectly cites bicycle use at *Grand Teton* and *Grand Canyon* as somehow analogous to the Big Bend proposal. However, in those parks, the NPS constructed trails for foot and bicycle use WITHIN the developed zone. The trails, such as the Grand Canyon Greenway, are close to, and generally parallel with paved park roads. Such use is hardly the equivalent of a trail constructed in park backcountry, as proposed at Big Bend.

The NPS is proposing at Big Bend something without precedent in the national park system. As such, the proposed action, which would normally be simply unwise, sets a course for the entire national park system, far longer than its ostensible ten-miles. Because of its precedent-setting nature, there is no way that the NPS can conclude that the proposal merits a Finding of No Significant Impact (FONSI). While the NPS was correct in first preparing an EA, **the NPS must now prepare an Environmental Impact Statement.**

4. Impacts and Inappropriateness

This trail would impact the resources of the park. Under the preferred alternative, largely undeveloped lands will be developed into a trail. The trail negatively impacts scenery, vegetation, soils, wildlife and natural quiet.

As important, the mountain bicycle trail impacts the values of the park and the national park system. The enjoyment that the parks are directed by law to afford is of natural and historic objects, scenery and wildlife “unimpaired.”

NPS Policies recognize that new and potential park uses must require consideration and scrutiny for application in units of the national park system:

...many forms of recreation enjoyed by the public do not require a national park setting and are more appropriate to other venues. The service will therefore:

Provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks;
(NPS Management Policies 8.2)

Thus, for national parks, not all “enjoyment” is equal or appropriate. Enjoyment associated with mountain bicycles may be an appropriate activity in some very limited park settings. It is inappropriate in an area of park backcountry to construct a trail where none now exists specifically to provide for mountain bicycle enjoyment.

These comments will not detail but will note some of the more common abuses associated with this form of recreational enjoyment – high speed, sharp maneuvers, high

injury rates (compared to hiking), racing and conflict with other users. We do not need to elaborate on these impacts but suggest that they should obviously have been part of the EA.

Conclusion

One of the sad aspects of this is that the area proposed for the trail offers, at best, a marginal mountain bicycle opportunity, compared with some superb rides on nearby state and private lands.

This proposal is much more about precedent than recreational pastime. IMBA recognizes that, even if the NPS pretends not to.

The area of the Grapevine Hills is roadless, undeveloped backcountry. Although never included in the NPS' wilderness recommendations to Congress, it would otherwise qualify. However, once the use of mountain bicycles is established, some users and special interest groups, though few in number, would exercise far more influence over the disposition of these lands than is warranted.

Our national park system touts itself as "America's best idea." The essence of that idea is long-term maximum protection of resources for the enjoyment of visitors now and for generations to come. A ten-mile mountain bicycle trail in undeveloped park backcountry is part of a slow and steady degradation of our parks into settings for thrill sports to the exclusion of enjoyment of national parks as preserves of natural and cultural features.

We urge the NPS to adopt Alternative A – No Action.

Cordially,

Jeff Ruch
Executive Director