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March 25, 2024

Michiko Martin  
Regional Forester, Southwestern Region  
USDA Forest Service  
333 Broadway SE  
Albuquerque, NM 87102

RE: Arizona National Scenic Trail Comprehensive Plan

Dear Regional Forester Martin,

Bikepacking Roots appreciates the opportunity to submit comments on the recently released Comprehensive Plan for the Arizona National Scenic Trail (AZNST).

Bikepacking Roots is a national non-profit organization, incorporated in Arizona, with 16,000+ members dedicated to supporting and advancing the sport of bikepacking, growing a diverse bikepacking community, advocating for access to and protection of public lands, and creating and maintaining high-quality routes.

We are the creators of several popular long-distance bikepacking routes including the Western Wildlands Route from the Canadian to Mexican border which utilizes portions of the Arizona National Scenic Trail. We also have a library of Community Routes from local Route Stewards, which includes the Queen's Ransom Bikepacking Route created by John Schilling, which follows a large stretch of the AZNST Southeast of Phoenix. Finally, we have included the AZNST (with mountain bike specific wilderness bypasses) on our interactive map with links to resources from the Arizona Trail Association (ATA).

We have a longstanding relationship with the ATA, and are in support of the comments they have submitted in regards to the Arizona National Scenic Trail Comprehensive Plan. In addition, we would like to emphasize some of the areas that are most important to us on behalf of the community of bikepackers and mountain bikers that we support.

To start off, I want to thank the Forest Service for recognizing mountain biking, including bikepacking as a managed use of the trail since its inception as a NST. We encourage the Forest Service to continue to manage the trail with bikepacking in mind as this trail has become a beloved route for many bikepackers and an important part of the history of bikepacking in this country.

Bikepackers actively seek out the primitive and natural landscapes, uninterrupted by motorized uses, provided by the Nature and Purposes of the AZNST. In addition, bikepackers overall as a community understand the importance of conservation and protection of the landscapes through which we ride. As an organization, our objectives are in-line with the objectives for management of the AZNST as described on pages 48-49 of the Comprehensive Plan. Bikepacking Roots has worked to educate bikepackers as a community to be responsible stewards of land they travel through on bikepacking trips. We partnered with the Leave No Trace Center for Outdoor Ethics to create a Love Where You Ride campaign to adapt the

Seven Principles specifically for bikepackers in order to help bikepackers minimize their impacts on the landscape.

Please find our specific comments on the draft version of the AZNST Comprehensive Plan below:

- We encourage the Forest Service to keep the proposed one-mile-wide trail planning corridor in the Comprehensive Plan to support the trail experience and protect scenic resources. While the planning corridor width will vary across the trail, based on numerous factors, we strongly recommend adding language for 1 mile to be the minimum width so as to protect the trail and its associated resources. In areas with greater visibility where trail users can see for up to 10, 20, 50 or more miles, the planning corridor should be wider. Since this will become very site-specific and is beyond the scope of this Plan, establishing the trail planning corridor as 1-mile minimum is necessary.
  - Related, the statement that “The national trail planning corridor will be selected through a separate administrative decision and published in the Federal Register after this comprehensive plan is completed” is concerning, unless a firm timeline is included. Please include a timeline/deadline within the sentence referenced above. Our recommendation is to add within three months between “Federal Register” and “after this comprehensive plan is completed.”
- We recommend prioritizing the relocation of sections of the trail that co-located on motorized routes to non-motorized single-track trail, as is outlined under Management Practices, page 58; bullet 2. In addition, under Management Practices, page 58; bullet 3; 1st sentence, we recommend a change to: *Motor Vehicle use by the public is, by law, prohibited on all sections of the AZNST. Sections that are colocated with open motorized routes are interim routes for the AZNST and must be relocated, or the motorized use must be terminated to comply with the NTSA.*
- We support the recommendation under Management Practices, Trail #2 Pg. 64: *Where a segment of the AZNST has a designed use of hiker or pedestrian, consider redesigning the trail or establishing trails to accommodate pack and saddle stock and mountain bike needs.*
- We encourage the Forest Service to designate and develop official alternate routes for wilderness bypasses for mountain bikes, consistent with the AZNST experience. We hope that a similar model can be followed as was created for Passage 11a, the alternative route for bicyclists and equestrians around the Pusch Ridge Wilderness on the Coronado National Forest, Santa Catalina Ranger District. While the Arizona Trail Association has developed wilderness bypasses for all instances where they are needed for bicyclists and equestrians, Passage 11a. is the only passage that has been signed with the AZNST service mark and mentioned in the Comprehensive Plan.
  - Relatedly, we support the ATA’s recommendation to recognize Passage 11a, the Pusch Ridge Wilderness Bypass, as an official connecting and side trail. These trails were designated in 2013 as an alternate route for AZNST mountain bikers and equestrians to avoid the Pusch Ridge Wilderness but maintain an experience consistent with the nature and purposes of the AZNST. As detailed within page 37 of the Comprehensive Plan, this

route is subject to change as new trails are built and realignments completed that are more suitable for the purposes of an AZNST Wilderness Bypass. Since these trails are already signed with the AZNST service mark; and the Arizona Trail Association promotes these trails, and engages volunteers to help maintain them, we recommend including the Pusch Ridge Wilderness Bypass as an official connecting and side trail.

- Thank you for addressing the long-standing issue of recreational target shooting near the trail on page 142. However, details within the Plan don't adequately address the significant threats to trail user safety and broader trail experience. We strongly believe that recreational shooting should be prohibited within the entire National Trail Planning Corridor.
- We support the recommendation on page 184 of prioritizing "purchase of State Land parcels where the AZNST currently crosses."
- We support the ATA's recommendation to add an inventory of Scenic Resources, Scenic Impacts, and Threats to Scenery as an appendix and to identify significant historical and cultural resources. The identification of these resources is necessary in order to ensure that they can be preserved.
- On page 57 under Managed Trail Uses, 2<sup>nd</sup> paragraph, 9<sup>th</sup> line, we recommend changing "...in the Grand Canyon where bikes are not allowed, hiking." to **in the Grand Canyon where bicycle wheels are not allowed to touch the ground, hiking.** This is necessary since bicycles are indeed allowed within the inner canyon for AZNST thru-riders, however the wheels can never touch the ground.

Thank you again for creating this Comprehensive Plan for the Arizona National Scenic Trail and for the opportunity to provide these comments on behalf of Bikepacking Roots and our community of bikepackers and mountain bikers. Please reach out with any questions about these comments and recommendations. We look forward to an opportunity to review the final draft this summer.

Sincerely,



Noelle Battle  
Executive Director