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February 14, 2005

Mr. John Debo  
Superintendent  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, OH 44141-3018

Dear Mr. Debo:

Thank you for the response letter sent to the Cleveland Area Mountain Bike Association (CAMBA) on November 5<sup>th</sup>, 2004 addressing our concerns raised in our August 12, 2004 letter. We appreciate the time Cuyahoga Valley National Park (CVNP) took to respond to our inquiries. Your response was informative, but generated additional questions and comments:

### **Trail Management Plan and General Management Plan**

According to the NPS document entitled "Park Planning Program Standards" dated August 9, 2004:

*"Each park is encouraged to prepare a Foundation for Park Planning and Management that describes its purpose, significance, primary interpretive themes, and special mandates...and identifies and analyzes those resources and values, including opportunities for public enjoyment, determined to warrant primary consideration in park planning and management."*

It further states that the purpose for the *Foundation for Park Planning and Management* is:

*"To provide an opportunity, either concurrently with or separately from the GMP [General Management Plan], for parks to discuss and document those foundation items that remain constant for all kinds of subsequent planning, management, and associated consultations with partners-particularly valuable if a park does not have a current GMP".*

**Question 1:** Is it necessary to prepare an entirely new park Trail Plan or General Management Plan to accommodate mountain biking? Is it possible for the existing plans to be amended or modified?

### **Perceived Need**

The response letter states:

*"...if there is a perceived need to undertake a major update of our park Trail Plan, or if we were to undertake preparation of a new or revised General Management Plan for the park, the mountain bike issue would be addressed..."* the letter goes on to say *"...we recognize that there is interest in mountain biking in Cuyahoga Valley National Park..."*

In our opinion, mountain biking, which has been in existence for approximately 30 years, is a well established activity within the cycling community. It is no longer a "fringe" activity. The popularity of the sport is well known. CAMBA's excellent reputation for developing, managing, and patrolling its trail systems is also well known. The combination of these factors and the positive influence that mountain biking can have on the park and the surrounding community leads us to conclude that the "perceived need" is real and should be addressed in a timely manner.

**Question 2:** Please explain the factors that must be present for CVNP to perceive a need for an updated trail plan.

### **Procedural Requirements For Mountain Bike Trails**

The response letter indicates that the addition of a mountain bike trail to the park would require CVNP to comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). CAMBA recognizes and agrees that NEPA compliance must be addressed in order to allow bicycles on trails in a National Park. The process has been done before and is known and documented by the International Mountain Bicycling Association. For example, Saguaro National Park was recently able to complete the process in approximately one and a half years.

Further, the cost associated with conducting an environmental impact study could be significantly reduced or even eliminated through matching funds or grants obtained by CAMBA through the use of our 501(c)(3) non-profit status.

**Question 3:** Please explain whether you feel compliance with NEPA and NHPA is a barrier or simply a process that must be completed.

### **Environmental Assessment Timeline**

The response letter states:

*"At this time, and for at least the next several years, it is not our intention to undertake an environmental assessment, or environmental impact statement, as the case may be, on mountain bike trail development and/or usage in the park."*

**Question 4:** Please explain why CVNP chose not to undertake an environmental assessment for "at least the next several years". Please also explain what is meant by "several years" and why that amount of time has been chosen.

### **Natural Resource Impact**

The response letter states:

*"...there are numerous potential impacts and concerns with mountain biking in our national park setting, including damage to flora, fauna and archeological resources; rutting and erosion effects on unstable soils and slopes; conflicts with other trail users; visitor safety and emergency response; off-trail "trespass"; capital development costs; and operational costs."*

As you are aware, these are concerns with all trails and all user groups. These concerns are not specific to mountain bikes. Each of these issues can be effectively managed for every trail type, whether hiking, cycling, or equestrian.

**Question 5:** What information and/or data was used to determine that mountain bike trails cannot be effectively managed using the same mitigation techniques that have been successful with other trails?

## **Planning Process**

According to Chapter 2: Park System Planning of 2001 National Park Service Management Policies:

*"The National Park Service will use planning to bring logic, analysis, public involvement, and accountability into the decision- making process...Each park will be able to demonstrate to decision- makers, staff, and the public how decisions relate to one another in terms of a logical, trackable rationale."*

Today, CVNP permits trails within the park to be used by hikers, horses, and cross-country skiers. Therefore, some type of decision-making process must have been undertaken to determine that these were appropriate uses of the park.

**Question 6:** Please explain the logic, analysis, trackable rationale, conditions, and parameters used by CVNP to deem hiking, horseback riding, and cross-country skiing appropriate.

**Question 7:** Please explain the logic, analysis, trackable rationale, conditions, and parameters used by CVNP to determine that off-road cycling is not an appropriate activity.

## **Providing recreation while conserving natural resources**

Each national park in the United States National Park system was created and established for specific reasons. While the legislation establishing most national parks in the United States mentions the preservation of natural resources, the legislation establishing CVNP is unique because it specifically identifies recreation as a primary purpose of the park:

*"For the purpose of preserving and protecting for public use and enjoyment, the historic, scenic, natural, and recreational values of the Cuyahoga River and the adjacent lands of the Cuyahoga Valley and for the purpose of providing for the maintenance of needed recreational open space necessary to the urban environment, the Cuyahoga Valley National Park...shall be established... In the management of the park, the Secretary of the Interior...shall utilize the park resources in a manner which will preserve its scenic, natural, and historic setting while providing for the recreational and educational needs of the visiting public."*

Further supporting the need for recreation in the National Parks, the National Park System Advisory Board published a document entitled "Rethinking the National Parks for the 21st Century" in July, 2001. This document outlines the purposes and prospects for the National Park System for the next 25 years. Of particular interest to CAMBA was the following goal identified in the document:

*"The National Park Service should be an energetic advocate of outdoor recreation and open space conservation, and of the considerable public benefits they provide."*

While recreation is a primary mission of CVNP, CAMBA recognizes that the park has a mandate to balance recreation with conservation of natural resources. Another goal outlined in the document included:

*"The National Park Service's statutory mandate to preserve park resources 'unimpaired' requires greatly increased focus on the conservation of natural systems and the biodiversity they encompass."*

CAMBA firmly believes that a balance between conservation of natural resources and providing outdoor recreation can be accomplished. We believe that the designation of existing trails as accessible to mountain bikes or the addition of mountain bike-specific trails meets both of these goals.

## **Conclusion**

We wish to lend our expertise to CVNP to assist your goals of providing recreational opportunities for your constituency. Our goal is to act as a trail partner and establish a relationship with the park much like that of the Ohio Horseman's Council and the Buckeye Trail Association. Our current partnerships have produced a safe and enjoyable recreational outlet for many people, reduced illegal and inappropriate land use, led to increased user satisfaction, increased park support, increased safety and security, and allowed the parks to easily enter into a more comprehensive recreational arena.

CAMBA is now an established organization with a proven record for building sustainable trails and educating mountain bikers and other trail users. We are well organized and our membership of 250 paid members continues to grow. Our educational and advocacy-based website receives hundreds of visitors each day. Off-road cycling access to Cuyahoga Valley National Park is at the very top of our priority list.

Again, we appreciate CVNP's willingness to meet with CAMBA in person and to respond to our written inquiries. It has always been our goal to work with land management agencies in the most professional and non-adversarial way possible. We look forward to your response and the opportunity to continue to work with Cuyahoga Valley National Park.

Sincerely,

Michael Farley  
Founder and Advocacy Director

William Braum  
President

cc: Bill Carroll, Deputy Superintendent