

REPLY TO: 7589 Ridge Road – Newcastle CA 95658

October 12, 2004

Mr. Steven W. Anderson, Field Manager
Bureau of Land Management
355 Hemsted Drive
Redding, CA 96002

Re: Proposed exchange of lands in Shasta and Trinity Counties
(CA 43098-FC/PT)

Dear Mr. Anderson,

I am writing on behalf of the International Mountain Bicycling Association (IMBA), which represents the many thousands of mountain bicyclists that enjoy riding on BLM lands throughout the state of California. We understand that the BLM is considering trading a 215-acre parcel of land near the city of Redding, (Area 51,) for a parcel in Trinity County, (Trinity.)

We have concerns about this proposed swap, because Area 51 has been used by mountain bikers for a number of years, and has become a critical link in several trail systems in the area. We urge that a solution be found, which recognizes and protects that use.

First, we agree that acquisition of the Trinity property is a worthwhile goal. We also understand that this process has been going on for some time, and grew out of a BLM planning effort in 1993. At that time, the City of Redding agreed with BLM's desire to rid itself of some land, and acquire other parcels, and further, that Area 51 could be disposed of as part of that effort. We also understand that land swaps are in many instances, the only tools available to obtain needed land, due to inability to sell land and keep proceeds for purchase of other property. Until these regulations are changed, land swaps have a great deal of appeal.

Even considering these realities, we hope there is a way to mitigate this situation. Area 51 is special to mountain bikers. We understand people have been riding the area since 1983, and that the water ditches that form the basis for the trail system had been there for almost 100 years before that. It's unusual, because it has been kept pristine, partly because it is stranded in an urban interface. It does have a user maintained trail system, which is untouched by the usual signs of urban proximity. It is in the middle of 8 distinct trail systems within a 2-mile

radius. It's a halfway point between Redding and Whiskeytown, via superb trails that BLM has already built. In fact, it has been suggested as a great section of the proposed Shasta-Trinity Trail from the Sacramento River to the Trinity Alps.

We also understand there are environmental and water quality concerns regarding this proposed trade. These have been covered by other documents you have already received. The argument is that BLM should consider the cumulative impacts to air quality, water quality, and fish habitat, which would result from the anticipated residential development of Area 51 if this transfer were completed. It seems clear that such development would seriously affect the Salt Creek watershed, which flows into the Sacramento River. As well, the area is significant as a greenbelt and wildlife corridor.

In sum, this seems to be a wonderful area that is very valuable to the community for recreation and natural resources. Of course this is one of the great aspects of BLM's mission.

Considering the above, is it possible to find a solution that maintains the wonderful attributes of Area 51? From the trail users' point of view, it might be best to cancel the proposal, and retain the parcel. Alternatively, we've heard of the proposal of the Shasta Community Services District and the Redding Trails and Bikeways Council to take over ownership of the parcel for public recreation, watershed protection and fuel load management under the Recreation and Public Purposes Act.

Of course, we realize this has been in the works for some time, and understand negotiations with the owner of Trinity have been underway for over a year. If, for reasons we are unaware of, it is impossible to cancel the swap, is it feasible to delay it to consider alternatives? It's been suggested, for example, that the BLM sell a portion of Area 51, to provide funds to purchase Trinity, while preserving the Area 51 trail system. Others have suggested that if Area 51 must be traded, that it include restrictions that run with the land, and would protect the trails and the watershed.

We would be delighted to assist in any way we can in this project. And, we would be pleased to receive your comments on these suggestions. My telephone number is (916) 663-4626; or email

Thank you for considering our remarks,

Jim Haagen-Smit
California IMBA Representative