



Flagstaff N AZ Group Joe Shannon Chair - 318 W. Birch Ave. #8 Flagstaff, AZ 86001
Phone: (928) 380-9537 Email: jshannon278@gmail.com

September 28, 2020

Ms. Christine Handler - Team Leader
Flagstaff Ranger District
Coconino National Forest
Submitted via Forest Service electronic form and
(Submitted via email to christine.handler@usda.gov as back-up)

Re: Submitted Comments - Mount Elden-Dry Lake Hills Recreation Plan – Scoping Proposed Action

Dear Christine Handler:

On behalf of Sierra Club Grand Canyon Chapter and Flagstaff Northern Arizona Group we thank you for your planning efforts for the Coconino National Forest and the Mt. Elden / Dry Lakes Hills (MEDL) area within. Please accept these comments regarding MEDL Recreation Planning Project Scoping Proposed Action. The Grand Canyon Chapter of Sierra Club has long been committed to protection of Arizona's lands, forest, wildlife, and national parks. The Sierra Club's mission is "to explore, enjoy and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments". Inspired by nature, the Sierra Club's more than 3.5 million members and supporters work together to protect our communities and the planet.

We have a long history of engagement with forest issues and with recreation issues on the Coconino National Forest. We interacted with staff, attended public meetings, and commented on the previous version of this project. Sierra Club participated in the stakeholder processes leading up to this current Proposed Action. Our members have a significant interest in this project because they hike, bike, climb, run, camp, and watch and photograph wildlife in the MEDL area, and have a deep concern about forest and wildlife health.

Sierra Club supports the objectives for a sustainable trail system, use of Forest Service Trail Standards, protection of forest resources, focusing on climate change and resource concerns among other things, and addressing the significant problems of human impacts and unauthorized trails. The San Francisco Peaks, including Mount Elden-Dry Lake Hills (MEDL), are a vital sky island that is currently experiencing climate crisis migration as both wildlife and humans seek higher and cooler terrain to escape the hot and dry conditions of lower elevations. This migration to higher terrain will continue to increase over time as our regional drought and climate change continue, thus highlighting the critical need for undamaged higher elevation landscapes and wildlife habitat within the MEDL Project Area.

Flagstaff accommodates 1.7 million visitors annually from the nearby Phoenix metropolitan area (out of over 5.5 million annual visitors).^[1] Metro Phoenix currently ranks number one for US population growth (population increase 100,000 per year) and ranks number one for the hottest city in the US.^[5,6] Forest capacity and the number of recreational users that can be sustained without imposing unacceptable damage to forest resources limits are factors that must be considered. Between the Shultz, Chimney, and Museum Fires, along with industrial logging operations including helicopters, there have been ongoing landscape disturbances in the San Francisco Peaks and MEDL area for a decade. Flagstaff voters agreed to a bond funding Flagstaff Watershed Protection Plan (FWPP) in 2010 and more recently, residents quietly accepted a fee increase in order to complete it. In order to prevent compounding these other disturbances, watershed resilience should also be one of the prime directives in recreation planning.

The Proposed Action lies within the San Francisco Peaks Traditional Cultural Property (TCP). The TCP is part of the cosmology of at least 13 Tribes. Recognizing that, Tribal consultation should have occurred prior to releasing maps for review by the general public. Outreach should be conducted to both Tribal members and Tribal governments. If there was no attempt to notify Tribal members or governments, this needs to occur with proper consultation, especially seeing the MEDL stakeholder-planning process has been ongoing for over a year. Coconino National Forest staff and Tribal staff have indicated this project was included in a Schedule of Proposed Actions (SOPA) notification but that further outreach in the form of a map and Proposed Action did not occur. We ask that the Forest Service work with interested Tribes to develop a map that avoids shrines and other sensitive areas, make necessary modifications to the project, and then release to the map to the public.

Any trail planning, construction or re-construction should be done with the full knowledge of, and in partnership with, representatives of indigenous communities in order to protect and preserve culturally significant areas and artifacts. Renaming established system trails and those proposed, in consultation with First Nations, would be a positive step forward.

Project objectives appear to be driven by perceived needs and demands of recreationists requesting many miles and a wide range of trail types. The MEDL project area, and even including the surrounding area of San Francisco Peaks (SFP), is extremely small compared with other comparable mountainous recreational regions in national forests throughout the western US. In fact, the entire area of MEDL plus SFP is at least 70 times smaller than a section Colorado's Front Range mountains just outside of Denver^[7,10,11,12], yet the nearby Phoenix Metro population is double the populace of Metro Denver^[8,9]. As population grows, recreational demands will continue to increase. We ask the Coconino National Forest (CNF) to follow the USFS guiding principles of advocating a conservation ethic and using an ecological and scientific approach for your decisions.^[2] We also ask the CNF to help our community work toward and understand the importance of a sustainable MEDL plan that places a high importance on the needs of the wildlife, and on the landscape resources without which the trails would not exist.

Flagstaff promotes and accommodates more than 5.5 million visitors annually.^[1] According to a 2017-18 Northern Arizona University Franke College of Business study, 32% of Flagstaff's 5.5 million+ visitors state their top reason to visit is hiking or walking on area trails – which is over 1.7 million visitors annually seeking a trail experience on foot.^[1] Five percent indicated their top activity is mountain or road biking, which translates into approximately 140,000 annual cyclists on trails. Therefore, it is unlikely MEDL or

even the entire Flagstaff Ranger District (FRD) has sufficient acreage to allow for continued expansion of recreation infrastructure while also protecting critical habitat for endangered and threatened species, as well as keeping cultural areas intact.

We realize and appreciate the enormity of the effort and tasks required daily of the CNF personnel. On this topic, we express strong concern for the overall amount of trail mileage proposed with the knowledge (that CNF managers have relayed to the public) that the CNF has difficulty managing the existing mileage of system trails and enforcing regulations on same trails, in addition to the high mileage of illegally constructed trails. We ask for a plan to regularly monitor the use and condition of forest areas and trails that includes a strategy for achieving both good stewardship and provisions for more law enforcement than currently exists.

It appears we are at a tipping point among recreation demand, forest capacity (especially in the MEDL area), forest resource integrity, climate and wildfire crisis, illegal trail construction, and law enforcement resources and capabilities. We recognize “hiker built” trails exist; however evidence easily shows the vast majority of illegally constructed trails (which are also regularly and illegally maintained with tools) are built by cyclists, for cyclists. It is common knowledge this is a widespread and ongoing problem that CNF has not been able to solve. We ask the CNF – What is your plan if the ongoing and widespread illegal trail construction does not stop? We respectfully submit the comment that the CNF has enabled purposeful and illegal trail construction by enlisting volunteer trail work from the same group that demands more trails, as well as, specific user-group designed trails. In our discussions with the community, we have heard a number of comments that a manageable and straightforward solution is to ban bicycles from the MEDL and Peaks areas and this action would also solve the challenging problem of managing the landscape to avoid illegal trail construction. Regarding the demand for bicycle specific trails, please note that Flagstaff Trails Initiative data and “Key Findings” show the majority of all reported trail use is hiking (and additionally, Flagstaff’s visitor study shows the number of walkers/hikers is 10 times greater than cyclists.^[1,3,4]

NEW TRAIL CONSTRUCTION, TRANSPARENCY, REALIGNMENT, AND CLOSURE/RESTORATION

- It is critically important that the MEDL Planning Project process and execution are done in a transparent, fair, and impartial manner to ensure the public’s trust.
- All funding amounts and funding sources obtained for any trail work, trail volunteers, trail crews, or anything related to this must be transparent and presented to the public.
- Information on collaboration regarding who / what entity is providing funding or trail volunteers, trail crews, etc must be transparent and presented to the public.
- The Forest Service is the responsible agency and should be the entity that is driving the MEDL process.
- The current estimate of additional planned trails appears to be approximately 55 miles. This needs to be reduced. The fragile, high elevation (and small) landscape of MEDL (as well as the Peaks) should not be the focus of attempts to satisfy all recreation demands. Other forest areas of the FRD (aside from MEDL and the Peaks) should be identified to reduce pressure on MEDL instead of locating more trails inside and around the perimeter of MEDL in an attempt to reduce pressure on MEDL. This logic makes no sense. In this respect, it is unfortunate that MEDL is the first area to go through NEPA, so we ask that you plan the MEDL trail mileage with the objective that other FRD areas will “take the pressure off MEDL”.

- The USFS is NOT responsible for creating the entertainment and outdoor thrill gymnasium that a subset of recreationists demand. The realistic place for these “needs” is a separate bike park or Disneyland type park outside of our public land.
- We ask that you include planning metrics or guidance; for example, appropriate trail mileage per square mile, or appropriate overall mileage, different elevations of trails, budget for trail/trailhead plans, etc.

Creating single-user, intended user, or directional trails is not in the spirit of public land management and shared use, especially in this limited project area. The unfortunate result, as already evidenced by current public social media comments, is a divisive attitude between recreation groups who view our precious resource as a competition for more territory. Instead, we advocate for multiple-use trails, which do not segregate recreationists, necessitates lower trail mileage, and allows desirable trail areas for all within the MEDL planning area. It is well known the US Dept. of Agriculture - Forest Service does not adequately budget for recreational planning or maintenance. Making priorities of multiple-use trails and considerate sharing of public land should reduce overall trail mileage and costs, as well as make clear the expectation of respect for others and our (limited) shared public land.

Trails should avoid wildlife corridors and sensitive areas including breeding territories for northern goshawk, Mexican spotted owl, and peregrine falcon; large mammal denning areas; and all areas with ephemeral or permanent springs or wetlands, as they are biologically significant. We strongly suggest expanding existing protected areas, such as Mexican spotted owl and goshawk nesting/fledgling sites. In addition, large expanses of higher elevation unburned landscape should be left undisturbed (i.e. no trail development) in order to provide essential territory for wildlife as their viable habitat steadily decreases with increasing human activity, land disturbance, and wildfire. Planning should begin by establishing these unfragmented habitat zones, and then plan trails (and relocate as necessary) to circumvent them. For one example, the “western” lake of Dry Lake Hills, and its surrounding area, and the western & northern slopes of Dry Lake Hills should be free of trails and new trail construction – this includes the swath of land from “Burrito” Trail north/west around to “Jedi”. Thus, we do NOT support any “Schultz Creek Loops” or trail connections to Schultz Trail on that part of the slopes between “Burrito” and “Jedi”.

Adopting existing trails is likely an efficient and cost effective approach, but we are very concerned this will exacerbate and encourage the widespread and persistent problem of illegally constructed trails, jumps, and features by cyclists. The accompanying problems are these trails are usually in drainages where the greatest plant and animal diversity is found (and permanently damaged), as well as extreme and unsustainable steep angles that lead to multiple gullies and large areas of slope erosion. We ask for a comprehensive recreation plan that directly addresses this problem and we would gladly offer our help and participation. Any potentially adopted trails should have an entirely new name, as using existing names will only embolden continued illegal trail construction.

We support the removal and restoration of indicated “green” non-system and illegally constructed trails on the provided MEDL map. Other illegally constructed trails that were not included on the Proposed Action map should also be closed and obliterated. This should occur in a systematic method and in increments, e.g. for every three miles of new or rerouted trail, the same amount of mileage of unauthorized trails are obliterated and restored. The result would be a balance of trails created/trails destroyed and also send a

message that unauthorized trails will not be tolerated. The same Trail Crew(s) that construct trails should also participate in destruction and restoration of trails. This way the trail crews are all working for the same common good.

Equestrian Trail System

We support this.

Elden Base and Highway 89 Urban Trail

We support this.

Sandy Seep Loops and “new pink north side of Mt Elden hiker trail”, Old Heart Trail adoption

- We oppose the two higher elevation Sandy Seep Loops/trail spurs that lead to the proposed new “pink” trail on the “north side of Mt Elden”.
- We support ONLY those “lower” Sandy Seep Loops in the vicinity of the existing Sandy Seep Trail and Christmas Tree Trail.
- We respectfully question the intent of adopting parts of the “Old” Heart Trail when the original reason for creating the “New” Heart Trail was to mitigate erosion/instability problems and damage to archaeological sites. If so, then the “New” Heart Trail should never have been built; instead, the Forest Service should have simply addressed areas of erosion/instability and cultural sites on the Old Heart Trail. It is also known that the main users of the Old Heart Trail were hikers who were completely satisfied with the existing trail. Yet the trail was completely rebuilt in a manner that specifically suits cyclists and does not suit hikers. Many people struggle to understand this. We are hearing increasing reports that the character of the new Heart Trail is known as a fast and exciting downhill biking trail. The mileage of new Heart Trail should be added to the mileage for biking trails.
- We oppose the new “pink” trail on the “north side of Mt Elden” – for these reasons:
 - There is no need to disturb the landscape with yet another new trail and bring more human disturbance into Mt Elden’s diminishing and rare natural habitat when there are already TWELVE nearby trails as listed: **SEVEN+** trails to the north/northeast (OLD plus NEW Heart Trails, Little Elden Trail, Elden Spring Trail, proposed Equestrian Trail system, plus “Lower” Sandy Seep Loops, plus proposed Highway 89 Urban Trail) and **FIVE** trails around the ridge on the south/southeast side (Elden Lookout Trail, Fat Man’s loop, Christmas Tree trail segment, Pipeline Trail, proposed Elden Base Trail).
 - We oppose the proposed “single-user” trails. Sierra Club advocates for multi-use trails that promote sharing and respect among users, as well as, reducing added disturbance to natural resources by increasing trail density through building single-user/user-designed trails.
 - We greatly appreciate this hiking trail proposal from CNF and acknowledge the occasions of inconsiderate behavior and conflicts. However, we have a deep concern, based on past, repeated evidence of human behavior, that “hiker-intended, closed to all other uses” trails will eventually end up as cycling trails with further damage and conflicts on the MEDL landscape due to the following:

- A) If the hiker intended trails make it through the National Environmental Policy Act (NEPA) process, based on social media and mountain bike forum posts we predict that cyclists will illegally use these trails and also create spurs of downhill trails off these trails,
- B) These “hiker intended” trails may be built but later be designated to host all users, failing to meet the original intent and unfortunately contributing to a newly damaged section of what is currently an undisturbed part of the mountain.
- C) In the transient tenure of forest service personnel, and probably in the near future, the next CNF administrator/supervisor/district ranger will revoke the “hiker only” trail status.
- D) The proposal and existence of “hiker intended” trails will only fuel (and has already fueled) other user groups to demand more and more of their own trails, thus again enabling more division between user groups and worse, enabling more destruction of the MEDL landscape and loss of habitat for wildlife.

Directional Mountain Biking and Counting trail mileage for different uses

- In terms of “counting trail mileage” for different uses, we suggest the mileage of the new Heart Trail is counted toward the total mileage of “downhill biking-intended” trails. As mentioned above, the new “multi-use” Heart Trail’s character has been completely changed from the original trail and is now considered a fast downhill trail.

Directional / Wasabi / Upper Oldham Trails / Shuttling

- We oppose directional mountain biking trails in the “Wasabi / Upper Oldham” area, even if the trails are multi-user trails. We do understand and respect that some cyclists desire this type of experience; however, the rare, small, unique, crowded, and endangered landscape of MEDL is not the place for this.
- The representation of several layers of multi-use trails plus the “directional” trails in this area is much too dense; will damage the landscape; will create confusion among users; will create multiple user “connector” trails between different tiers simply because trails are too close to each other.
- This “Wasabi” area has been highly damaged by fire and needs to recover. Prior to the Museum Fire the location of the Wasabi trail (and where it is unadvisedly still proposed) was in a lush and diverse drainage that resembled a forest in the northwest US. As mentioned above, drainages – especially north-facing with more moisture – contain the highest diversity of vegetation and wildlife. If allowed to, this drainage could recover to a condition similar to what it was earlier. We ask that this north-facing drainage area and slope be undisturbed after removal of the unauthorized “Wasabi”.
- In addition, there is no need for “tit-for-tat” cycling vs. hiking trails and additional damage to the landscape if the “new pink north side of Mt Elden hiker trail” is not built.
- We oppose directional/technical biking trails in general because, as mentioned above, the USFS is NOT responsible for creating an entertainment environment or outdoor adrenaline gymnasium that a small group of recreationists demands. The realistic and logical place for these type of activities is a separate bike park that is specifically built, maintained, managed, and insured for this activity.
- We oppose any trails that will promote vehicle shuttling of bikes and increased motorized activity on Elden Road and the MEDL area. Please note that the MEDL plan stated objectives are: *“Dispersed recreation in a semi-primitive non-motorized setting and to manage for wildlife habitat”*; To *“reduce*

resource impacts from increasing recreation and meet changing demands for trail use and other non-motorized dispersed recreation”; “Mitigation of existing impacts to wildlife habitat, soil and water resources”.

- Please note that our MEDL Work Group invited a professional mountain biker to our meeting. She indicated, and cycling representatives in our Work Group agreed, that the demand for shuttling bicycles is diminishing and only a small handful of cyclists want to shuttle. It was also stated and agreed that with improving bike technology, there is decreasing need to shuttle bikes.
- Thus using Elden Rd (or any other forest road) for the purpose of shuttling bikes for a small interest group is inappropriate and unnecessary. In addition, such use is very costly in terms of the road damage and necessary resurfacing of Elden Rd from increased vehicle use, high speeds and sudden braking, wash-boarding, and ruts. Not to mention the constant noise and dust pollution and ongoing disturbance to wildlife up to ½ mile from the road. We have frequently seen groups of deer on either side of Elden road at both low and higher elevations.
- As mentioned by our invited MEDL WG expert mountain cyclist, the actual percentage of cyclists is very low who have the ability to safely ride in control on a technical, steep, dangerous downhill trail. Is this really an appropriate use of precious forest resources, as well as limited funding and personnel to design and maintain specific trails for a small sub-user group?
- It does not seem wise for the USFS to design technical steep trails with a very high probability of bodily injury to either skilled or unskilled riders. Once again, these type trails belong in an established park that is covered by adequate liability insurance.
- **NOTE: We support repair and improvement of Upper Oldham trail** in/near its original location for multiple-use, and avoiding protected habitat.

Devils Chair Trail and “east traverse connector w/Elden Lookout and Sunset”

- We oppose the long traverse that goes east of Devils Head. This traverse was not discussed or agreed to in our MEDL Work Group.
- This long traverse all the way to the top of Elden Lookout Trail is unnecessary and will disturb hundreds of acres of Mt Elden that are currently untrailed. There is also potential for this traverse to become a “take-off” location for multiple trails leading down the southern slopes of Mt Elden.
- As occurred in our MEDL Work Group discussions, we support the Devils Chair trail **only up to Devils head and no further**, thus as an “out and back” trail, that is open to all users. However, once recreationists reach Devils Head, they can make use of already existing roads to access another trail e.g. Upper Oldham or Sunset, etc.

Schultz Creek Loops

- We oppose all Schultz Creek loops and trail spurs NORTH (or west) of Burrito Trail.
- These proposed loops and additional trail spur over to Schultz trail are in the exact area our MEDL Work Group repeatedly discussed as an area for wildlife with no trails/construction. As mentioned above, the “western” lake of Dry Lake Hills, and its surrounding area, and the “western & northern” slopes of Dry Lake Hills should be free of trails and new trail construction – this includes the swath of land and slopes from “Burrito” Trail north/west around to “Jedi”.
- We oppose the “trail spur” heading north to connect to Schultz Trail. If the idea is to reduce congestion on Schultz Trail, then this “spur/loop” trail would only draw more people over to Schultz.

- Additionally, the presence of this “spur” trail over to Schultz will invite creation of downhill trails either from the western lake down to it and/or downhill trails taking off from this spur down to Schultz Trail (as is already occurring in numerous locations throughout the length of Schultz Trail coming from both Dry Lake Hills and from Fort Valley/Schultz Road/AZ Trail).
- We oppose Schultz Creek loops on the east (or south) side of Burrito, **unless** they are at a lower elevation than is represented on the MEDL map, e.g. at 7500 feet elevation or lower and **they must not connect to the proposed Ginger Trail**.
- We oppose Schultz Creek Loops that traverse over to and connect with the proposed “Ginger” Trail. Once again these represented “loops” are much too high in elevation and will invite creation of downhill trails either from the “eastern” dry lake down to it and/or multiple downhill trails taking off from this Loop connector to Ginger and down to Rocky Ridge Trail.
- Loops between 7000 and 7500 feet elevation would provide recreational trail options at varying elevations but also be far enough below the top of DLH to deter downhill user created trails attempting to connect with the loops. The loops our MEDL WG agreed to were much lower in elevation than shown on the map and were also in the “old golf course” area near Schultz Trail.

Dry Lake Ridge Trail

- We oppose Dry Lake Ridge Trail to the west of Ginger and connecting to Schultz Creek Loops.
- We oppose Dry Lake Ridge Trail **unless it is changed and only connects** Ginger-to-Brookbank and Ginger-to-Jedi.

Lost Burrito Trail Adoption

- We support Lost Burrito trail adoption (with a different name as this will encourage and embolden continued illegal trail construction).
- We oppose any trail connectors touching Burrito e.g. the proposed Dry Lake Ridge Trail and the proposed Schultz Creek Loops. These loops should be separate from Burrito.
- As mentioned above, we oppose Loops that traverse over to and connect with the proposed “Ginger” Trail. Once again these represented “loops” are much too high in elevation and will invite creation of downhill trails either from the “eastern” dry lake down to it and/or multiple downhill trails taking off from this “Schultz Creek Loop” connector to Ginger and down to Rocky Ridge Trail.
- Burrito Trail actually has a long and interesting history connected to the forest and Flagstaff. A trail name could be taken from this history. We would be glad to assist in learning more about the history of Burrito Trail for MEDL purposes.

Ginger Trail Adoption

- We support, **with reservations**, Ginger adoption (please do not use “Ginger” name as this will encourage and embolden continued illegal trail construction).
- We oppose any trail/”Schultz Creek Loop” connecting to Ginger from the west for reasons mentioned above in Schultz Creek Loops section.
- We support the connection of Ginger to Brookbank, and Ginger to Jedi.

Little Gnarly Bypass

- We oppose the “Little Gnarly Bypass single-track” that would parallel the existing Little Gnarly/Admin Road. This is redundant and unnecessary and more damage to resources. Recreationists can use the existing Little Gnarly with gratitude.
- We support the short ~quarter mile connecting segment between top of Little Gnarly and Upper Brookbank.

Jedi Trail Adoption

- We support “Jedi” adoption.
- We ask that CNF does not use existing “Jedi” name as this will encourage and embolden continued illegal trail construction.

Red Onion Trail Adoption

- We support this, with necessary reroutes to avoid Mexican Spotted Owl habitat.
- We ask that CNF does not use existing “Red Onion” name as this will encourage and embolden continued illegal trail construction.

Schultz Tank Trail Adoption

- We support this.

Climb 3 Trail Adoption

- We support Climb 3 Trail Adoption (with a different name as mentioned above).
- NOTE: It is a bit confusing to read “Schultz Creek Loops” (e.g. those proposed trails in the Burrito area) and “Schultz Loop” which is a single loop that has long existed near the top of Schultz Trail & Little Gnarly & “Lincoln Logs”. Climb 3 has no connection to any Schultz Creek Loop, nor should it.

TRAIL RELOCATION AND IMPROVEMENT

Brookbank Trail

- We support this **providing** the rerouted Brookbank Trail **stops east of “Ginger”** and no trail/loop or connector leads west/southwest from “Ginger”.

Upper Oldham Trail

- We support repair and improvement of Upper Oldham trail in/near its original location for multiple-use, while avoiding protected areas.
- We oppose all proposed trails using “Wasabi” and the mentioned “Oldham Basin” area.
- Please also see above comments regarding Upper Oldham/Wasabi in the “**Directional Mountain Biking / Wasabi / Upper Oldham Trails / Shuttling**” section.

Sunset Trail segment reroute

- We support this **providing no other trails are allowed to spur off of this**. There are already too many trails in this important, moist, north-facing area along Sunset Trail that provides important habitat for wildlife.

Elden Lookout Trail

- We support this.
- Elden Lookout Trail should retain its historical trail policy – as Hiker-only trail. The Coconino National Forest made this designation and policy approximately 25 years ago (~1995) based on serious safety, erosion, and conflict problems that arose when cyclists first began attempting to ride down it.

General Trail Signage

- We support this.
- We ask that:
 - o The “Triangle Trail Courtesy” sign is posted at every single trail.
 - o All other FS sign indicators are also posted at every trail sign, e.g. icons showing what uses are allowed and what is prohibited, etc.
 - o The FS post the “NO E-BIKES” sign at all trails.
- We also support signage and information regarding stewardship and resource appreciation.
- We ask that the FS also post infraction consequences at signs. Our MEDL WG discussed that posted signs warning of actual consequences (e.g. “\$5,000 fine and 6 months in jail” are found to be much more effective in deterring unlawful behavior as opposed to signs that just said “X is prohibited” or “Please do thus and so”.
- The Forest Service should consider a “No sign=No Trail” policy. If the trail has no sign, it is closed. Many forest users do not realize there is a difference between system and non-system trails, and making people aware of this will help with education and enforcement.

General Trail System

- We support this.

CLOSURE AND RESTORATION OF UNAUTHORIZED TRAILS

- We support the removal and restoration of non-system and illegally constructed trails on the provided MEDL map.
- Other illegally constructed trails that were not included on the Proposed Action map should also be closed and obliterated.
- This should occur in a systematic method and in increments, e.g. for every three miles of new or rerouted trail, the same amount of mileage of unauthorized trails are obliterated and restored. The result would be a balance of trails created/trails destroyed and also send a message that unauthorized trails will not be tolerated.
- The same Trail Crew(s) that construct trails should also participate in destruction of trails. This way the trail crews are all working for the same common good.
- We suggest wooden “permanent” signs educating the public on why this trail was removed, and why illegal trail building is damaging to our shared environment. In time, as the trail fades, the sign can be removed. Similar signs were posted at the top and bottom of an illegal trail off Snowbowl Road near Aspen Corners. It was effective and the signs were removed. However, it looks like trail builders have revisited that area and attempted to build trail features.
- Please refer to above comments regarding signage, stating consequences of illegal activities.

TRAILHEAD IMPROVEMENTS & Double Gates

- These trailhead ideas in general are good management activities to consider. However, more details and clarification is needed in the final environmental assessment. For example: What should people do when the trailheads are full?; How will the Forest Service handle winter access with ongoing trash and roadside parking problems?
- We suggest constructing double gates, one at the Forest boundary and a second recreation gate further up the road, will have many positive outcomes for both Elden Lookout and Schultz Pass Roads. Regional Recreational plans (e.g. MEDL, FTI) result in significant increases in motorized activity, including ATVs, side-by-sides, as well as motorcycles and other type vehicles, thus there is a critical need to control and remove the anticipated surge in motorized activity throughout the MEDL area.
- An idea we discussed at our MEDL WG meetings was access via a transit system from Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) or other transit provider. We have presented this information to the CNF as well, and NAIPTA worked with us to produce a Transit Plan for Schultz Rd. We are happy to share this and discuss it again. A “trail bus” or open-air type of bus would travel between the recreation gates on Shultz Road on a schedule and recreationists could have further access in MEDL area. Perhaps a plan could be designed for shuttling bicycles e.g. For recreationists over 55 or limited trips per day (to prevent repeated bicycle shuttling for multiple downhill trail rides). This plan would allow for access without the persistent noise and dust from excessive motorized vehicles, 4-wheelers, etc.
- Double gates would not preclude activities, such as special events.
- Once again, may we list the stated objectives for the MEDL planning project: **“Dispersed recreation in a semi-primitive non-motorized setting and to manage for wildlife habitat”**; **To “reduce resource impacts from increasing recreation and meet changing demands for trail use and other non-motorized dispersed recreation”**; **“Mitigation of existing impacts to wildlife habitat, soil and water resources”**.
- A good example is the current double Elden Lookout Road (FR 557) gates. These gates allow for complete closure at the first gate as necessary, and permanent closure of Elden Road above the second gate. Double gates also will allow recreationists to get further into the backcountry, as well as admin / permitted access. This also will prevent repeated vehicle shuttling of cyclists, which was a growing problem for safety, erosion, and conflicts. A second gate will also dissuade the ongoing proliferation of illegal downhill trail construction. We urge the CNF to continue the closure of Elden Road at the second gate.
- The double gates also prevent another safety/dust/noise/excessive motorized problem that is greatly increasing in the MEDL area, which is a plethora of different types of Four-wheelers. We have observed increasing numbers of large four-wheeler groups speeding up and down Schultz and Elden Lookout Roads, as well as, illegally driving on closed roads at dangerous speeds, e.g. on FR 6275, 6273, 9122J, and any area logging roads.
- We suggest double gates on both ends of Schultz Pass Road (FR 420) as well.
 - o The first gate on the west side (near Hwy 180) could be at/near its current location and the second gate could be approximately ½ mile up the road where a second trailhead and parking could be located, e.g. in the open logging areas ½ mile up Schultz Rd on the left side. Another good location could be the large logging staging area ~1 mile up Schultz, just past

the cattle guard on the right side. If placed here, it is suggested that another barrier/boulders/gate are placed on 6275, which forks off near here and is already a “Closed To Motorized Travel” road.

- The first gate at the east end (near Highway 89) will remain in place (or placed where the new Equestrian area is) where it would be closed seasonally/as needed and the 2nd gate could be placed at the junction of FR 556 and FR 420 which would remain permanently closed, except for Admin/permitted purposes.
- These second gates will allow adequate access to Schultz Road area trails, but prevent excessive motorized activity and associated negative impacts. As mentioned above, we have presented shuttle bus transportation information to the CNF as well, and NAIPTA worked with us to produce a Transit Plan for Schultz Rd. We are happy to share this and discuss it again. A “trail bus” or open-air type of bus would travel between the recreation gates on Schultz Road on a schedule and hiking recreationists could have further access in MEDL area. Perhaps a plan could be designed for shuttling bicycles e.g. For recreationists over 55 or limited trips per day (to prevent repeated bicycle shuttling for multiple downhill trail rides). This plan would allow for access without the persistent noise and dust from excessive motorized vehicles, 4-wheelers, etc.
- This topic is related to MEDL roads (FR 420 and adjacent closed roads). We suggest an additional gate on Freidlein Prairie Road at the east end where it junctions with the top of FR 6275, which is a “Closed To All Motor Vehicles” road. This will prevent unauthorized access to 6275, and 6273 & 9122J (which are also “Closed To All Motor Vehicles” roads). We are also aware that CNF has considered closing Freidlein Prairie Road to camping as a method of fire prevention, which is a good idea.

Schultz Tank Trailhead Improvements

- We oppose enlarging Schultz Tank or the nearby Sunset Trailheads, although bathroom placement is supported.
- The large logging area across from Sunset Trailhead is a better choice than enlarging the above parking lots and damaging more of the forest.
- NOTE: Our “double gate” suggestions along with Schultz Pass Road closure to motorized vehicles would negate the need for expanding parking lots. See the “**TRAILHEAD IMPROVEMENTS & Double Gates**” section above.

Relocate Little Elden Trailhead

- We support this.

Relocate Schultz Creek Trailhead

- These comments were mentioned above in the “**TRAILHEAD IMPROVEMENTS & Double Gates**” section.
- In regard to Schultz Creek Trailhead we suggest double gates on both ends of Schultz Pass Road.
 - The first gate on the west side (near Hwy 180) could be at/near its current location and the second gate could be approximately ½ mile up the road where a second trailhead and parking could be located, e.g. in the open logging areas ½ mile up Schultz Rd on the left side. The challenge will be to place the gates at a location that cannot be bypassed and has adequate

barriers of trees/boulders/etc. Another good location could be the large log staging area ~1 mile up Schultz, just past the cattle guard on the right side. If placed here, it is suggested that another barrier/boulders/gate are placed on 6275, which forks off near here and is a “Closed To Motorized Travel” road.

- The first gate at the east end (near Highway 89) will remain in place (or placed where the new Equestrian area is) where it would be closed seasonally/as needed and the 2nd gate could be placed at the junction of FR 556 and FR 420 which would remain permanently closed, except for Admin/permitted purposes.
- These second gates will allow adequate access to Schultz Road area trails, but prevent excessive motorized activity and associated negative impacts.

Oldham Basin Trailhead

- We do not support this trailhead location. We suggest the trailhead and parking location be exactly where the current second Elden gate and parking lot is located.

The “Y” Trailhead

- We oppose construction of a trailhead in the current “Y” location. This is a complicated intersection that would be dangerous for two converging roads, vehicles, bicycles, and people on foot. We support a new trailhead a little further east on Elden Lookout Rd, e.g. on Forest Service land, or as long as the City of Flagstaff is not using taxpayer or property funds to pay for it.

Elden Lookout Trailhead Expansion

- We support this.

Sandy Seep Trailhead Expansion

- We support increasing to 30 vehicles with boundaries erected to prevent people from driving further into the forest.

SPECIAL USE TRAIL EVENTS

- We support planning and mitigation to reduce damage and negative impacts to the physical and cultural landscape and wildlife. This is another area where fair management of trails and trailheads is needed in order to accommodate an influx of people without desecrating the landscape. Event permits should include a large fee from the Permit holder/host, in addition to another fee from each participant to cover CNF personnel, maintenance, and administration in the MEDL area related to the event.
- The total amount of money collected, different associated costs, amount donated, paid personnel, etc should be completely transparent and provided to the public to ensure the event that is occurring on our public land is truly “non-profit”.
- Special events should be a very limited occurrence within MEDL, with most events located outside of MEDL due to already existing over-crowding in this area. Along with the disturbance and impacts of racers on event day, we also are inundated with large numbers of participants training on the race route for weeks beforehand. Thus, Special Events have negative effects many days before the actual event, which need to be mitigated.

- Number of days of events, number of participants should be limited, and events should not be allowed on any holidays throughout the year or during high Fire Danger season – May – mid-July, when we have needed to close the forests. It is inappropriate to draw large crowds of people, especially during fire danger.
- Event permittees should not post their trail signs until one day before and should remove their signs immediately after the event is over. We have repeatedly seen trash from flagging and signs left in the forest for weeks after an event. Permittees that disrespect the forest and our community should be fined and banned from hosting any future events.

MOUNT ELDEN ENVIRONMENTAL STUDY AREA IMPROVEMENTS

- We support this. This would be a good outreach project particularly if done in coordination with other agencies, municipalities and non-profit organizations.

PROPOSED DESIGN FEATURES

- We support this. Thank you for listing them.
- Specific Comments: These listed best management practices will overall have significant positive value. Regarding endangered wildlife protection – a 0.5-mile perimeter is a good start and we suggest making the perimeter larger. Regarding Protected Activity Centers (PACs) – we recommend expanding the size of all PAC areas and plus expanding areas of sensitive species and wildlife habitat in general. In general, the boundaries are too small and do not take into account the changing conditions/climate crisis/sensitive species responses to changes. In addition, no trails should be within these protected habitat areas at all, regardless of time of year (e.g. Mar 1 – Aug 31). Since, there is little day-to-day oversight by FRD staff on trail usage, we cannot be sure recreationists will stay away from PACs at certain times of year, thus trails should not be near them at any time.

ADDITIONAL COMMENTS

COMMERCIAL PERMITS

- The commercialization and potential abuse of this small, yet unique and precious area seems inevitable. We ask the CNF to recognize the large, negative impacts that commercial guiding or groups would have on this very small area.
- A ban on certain commercial activities should be included in the MEDL EA. For example, according to meetings and discussions we've had with forest service managers, downhill biking and commercial shuttling should not be promoted due to the myriad associated problems, e.g. increased motorized activity in the MEDL area that has stated objectives for a non-motorized recreation plan; user safety and conflict issues from speeding vehicle shuttles and speeding downhill bikes on forest trails; encouragement of illegal downhill trail construction as a result of CNF support for vehicle shuttling.

TRANSPARENCY

- It is critically important that the MEDL Planning Project process and execution are done in a transparent, fair, and impartial manner to ensure the public's trust.
- All funding amounts and funding sources obtained for any trail work, trail volunteers, trail crews, or anything related to this must be transparent and presented to the public.

- Information on collaboration regarding who / what entity is providing funding or trail volunteers, trail crews, etc must be transparent and presented to the public.
- The Forest Service is the responsible agency and it should be evident that the Forest Service is the entity that is driving the MEDL process

Sincerely,

/s/

Joe Shannon

Chair

Sierra Club – Grand Canyon Chapter, Flagstaff-Northern Arizona Group

Alicyn Gitlin



Sierra Club – Grand Canyon Chapter

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