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December 22, 2021

Forest Supervisor Laura Jo West,
Flagstaff Ranger District
Coconino National Forest
Submitted via email to objections-southwestern-regional-office@usda.gov

Re: Objection – Mt. Elden-Dry Lakes Recreation Plan – Environmental Assessment

Dear Forest Supervisor Laura Jo West:

On behalf of Sierra Club Grand Canyon Chapter and Flagstaff Northern Arizona Group, we appreciate the opportunity to participate in the Coconino National Forest (CNF) Mt. Elden / Dry Lakes Hills Recreation Planning Project Environmental Assessment (MEDL-EA) Objection process.

We thank you for all your time and significant effort on the MEDL-EA. We have noted and sincerely appreciate the important adjustments that were made to the original MEDL Proposed Action and the MEDL-EA. However, we need to object to these components of the Final MEDL-EA.

The Sierra Club Grand Canyon Chapter and Flagstaff Northern Arizona Group object to the below components. We have complied with the listed (36 CFR 218.8(d) requirements #1-6 in this document.

- 1) We object to the MEDL-EA omission of implementation of “36 CFR 261.56. Possessing or using a bicycle off of National Forest System Roads or trails in the restricted areas.”

This is a violation of the MEDL-EA stated Needs and Objectives to address wide-spread creation of unauthorized trails, mitigating resource concerns and issues, restricting further use of unauthorized trails, deterring further illegal trail construction.

We commented on this topic in our submitted MEDL-EA Comments (June 29, 2021; Sierra Club Submitted Comments, Pages 2-3, under **Illegal construction of bike trails and solutions**).

Furthermore, we have discussed the need and justification for implementation of “36 CFR 261.56” (or a similar 36 CFR 261 that prohibits bicycles going cross-country off of system trails) throughout the entire MEDL area with Coconino National Forest District Ranger (Matt McGrath) and his staff (Patrick McGervey) several times during in-person meetings, on email and phone.

It is well-known the very first phase of illegal bike trail construction begins with the action of riding a bicycle cross-country over the intended illegal route to create the trail tread. Illegal bike trail construction using tools immediately follows. Prohibiting bicycles from going off of system trails throughout the entire MEDL area will help prevent more resource damage and illegal trail construction, especially seeing the CNF states the MEDL project will take five to ten years to complete. Five to ten years is a significantly long time for further illegal bike trail construction to occur. Immediate implementation of 36 CFR 261.56 will send a strong message of CNF expectations and intolerance for illegal bike trail construction. It will also make it much easier to implement your stated MEDL-EA need and objectives to “mitigate resource concerns, deter further illegal trail construction, and Early Detection, Rapid Response, and Criminal Investigation”.

The ongoing problem of illegally constructed bike trails has been a significant part of the MEDL Project conversation since 2013. We are referring specifically to the numerous illegal bicycle trails deliberately constructed by cyclists with tools, which has been acknowledged repeatedly by the Coconino National Forest (CNF) and by every MEDL stakeholder as a widespread, long-term, and pervasive problem throughout the entire MEDL area. In fact, CNF reference to “unauthorized / illegal trails construction” occurs over 346 times throughout the MEDL-EA and Draft Decision Statement.

Illegal bicycle trails will continue to be constructed unless the CNF takes overt action to prevent it. In spite of the well-publicized upcoming bicycle-specific MEDL trail projects, illegal bike trail construction continues to be documented in the MEDL area today. For example, just one recent social media post by a local cyclist riding off-trail in a very steep, pristine, undisturbed area on Mt Elden has resulted in several posts of others eager to follow his example and then posting their photos on Mt Elden. Please note - when (the illegal bike trail) “Private Reserve” was first created, few people thought anyone would ride it due to its extreme obstacles and steep slope. Private Reserve quickly became one of the most popular illegal bike trails, ridden so much that many alternate lines have been created due to destruction of terrain and gullies over a foot deep that exist throughout the route. There are many more documented examples of current illegal trail construction, too numerous to mention in this space.

In order to resolve this Objection, we request that CNF create and implement a regulation analogous to “36 CFR 261.56. Possessing or using a bicycle off of National Forest System Roads or trails in the restricted areas” into the Final MEDL-EA ROD for the entirety of the MEDL area with listed exceptions only on specific existing trails (e.g. designated trails to be adopted or potentially other existing trails only until new project trails are constructed).

Adoption Exception examples: Climb 3, Jedi, Upper Red Onion, Lone Eagle...

Non-adoption Exception examples: CanI (e.g. only until “Sunset Ridge” [or similar] is completed); Pickle (e.g. only until the “new Brookbank” is completed); Upper/Private Reserve (e.g. only to the connection of Lone Eagle/only until similar project trails are constructed), etc.

Please include a map with these trail exceptions for clarity to the public and cyclists.

The above temporary trail exceptions will solve the administrative problem of allowing bicycle riding on certain existing non-system trails during the five to ten year project period in consideration of their future adoption. As new trails are added to the allowed/system trails, existing illegal trails in the Exception list (e.g. CanI, Pickle, etc.) would be obliterated and added to the 36 CFR 261.56 prohibited area.

This 36 CFR 261 administrative work is well worth the extra effort based on the long-term, extensive damage from unauthorized/illegal bicycle trail construction. Only with prohibitions of riding bicycles off of system trails and illegal trail construction will the CNF achieve your stated project need and objectives to address and prevent further illegal trail construction (MEDL-EA p.4, 6; Draft Decision p. 6.)

To comply with (36 CFR 218.8(d) #4: This Objection #1 resolution “project” is named “36 CFR 261.56. Possessing or using a bicycle off of National Forest System Roads or trails in the restricted areas”; Coconino National Forest; Flagstaff Ranger District; the title of the responsible official is Matt McGrath, Flagstaff District Ranger.

- 2) We object to future commercial guiding of any type in the MEDL area, and especially to the unqualified allotment of 65,700 user days for this small and environmentally fragile area that is already (as acknowledged by the CNF) overcrowded and overused. Furthermore, this fragile area is extensively damaged by wildfire, logging, and post-fire flooding, in addition to climate change effects and recreational resource damage.

We commented on this topic in our submitted MEDL-EA Comments (June 29, 2021; Sierra Club Submitted Comments; Pages 4-5 under **Regarding Commercial Outfitting and Guiding**).

This is a violation of the MEDL-EA stated objectives to mitigate impacts to natural and cultural resources; mitigate crowding, recreation conflicts, and negative recreation experiences; mitigate wildlife concerns; increase sustainable use of system trails; protect natural and cultural resources, wildlife and wildlife habitat; and respond to ongoing negative impacts from unsustainable recreation on forest resources. This is also a violation of the Coconino National Forest Plan 2018 need and management guidelines: recreation opportunities are balanced with the capacity of forest resources to support them; low impact recreation principles are widely practiced by the visiting public; recreational activities are managed to have minimal user and resource conflicts; recreation settings on the Coconino NF are stable and retain their natural character.

It is concerning that, CNF would mention potential future commercial guiding plans in the MEDL-EA without previously informing the public and without the NEPA process. It is also very concerning that the CNF Recreational Special Use Management Plan 2018 (specifically referred to in the MEDL-EA as the basis for allotting user-days) is vague at best, and it admits that “*different models used to calculate capacity can lead to very different results. Therefore, recreation planners must use professional judgment when applying capacity to management goals.*” This is not a realistic basis for determining commercial user-days in such a small fragile area, especially in today’s unprecedented environmental deterioration, over-crowding, wildfires, floods, and climate change.

We find the determination of MEDL user-day allotments (and the CNF Recreational Management Plan) to be lacking in scientific metrics for calculating user-days and neglecting to include important scientific examination of regional forest differences in landscape and environmental conditions as related to assignment of user-days. For example, the CNF Recreational Management Plan is lacking any examination of climate crisis, logging, wildfire, and flooding impacts, fragility of the MEDL area, existing negative recreation impacts, and over-crowding in the MEDL area.

In order to resolve this Objection, we request that CNF:

- a) Omit the allotment of 65,700 user-days for MEDL from the MEDL-EA ROD.
- b) Use science-based research regarding calculation of potential user days showing consideration of these existing conditions in the MEDL area: the current climate crisis; current overcrowding; current severely damaged resource and wildlife habitat from wildfire, logging, flooding, and existing negative impacts from unsustainable recreation.
- c) Provide public meetings and include public participation with any commercial guiding proposals and/or plans for the MEDL area. Allow the public to communicate with CNF officials who determined the user-days allotments as part of the meeting process. Commercial use requires its own NEPA process.
- d) Provide current and up-to-date scientific research references, and much more detailed information to the public on exactly how the Forest Service user-day capacities are determined, e.g. How old are these metrics and models? Do they lump all national forests into pre-determined land capacity categories that have no scientific basis? What was the geographical, environmental, and ecological landscape basis for the capacity amounts? Was the climate crisis, logging and wildfire and flooding impacts, fragility of the area, and existing over-use of MEDL calculated into the capacities?

To comply with (36 CFR 218.8(d) #4: This Objection #2 resolution project is named “Removal and re-evaluation of MEDL allotment of 65,700 user days”; Coconino National Forest; Flagstaff Ranger District; the title of the responsible official is Matt McGrath, Flagstaff District Ranger.

- 3) We object to new “hiker-only” trail that would go up to Elden Lookout from the Sandy Seep loops in Mt Elden’s inner basin.

We commented on this topic in our submitted MEDL-EA Comments (June 29, 2021; Sierra Club Submitted Comments; Page 6, under **Sandy Seep Loops, “new north side of Mt Elden hiker only trail”, Old Heart Trail adoption**)

This is a violation of the MEDL-EA stated needs for a sustainable and well-planned trail system; to protect wildlife and wildlife habitat; to consider wildlife impacts, habitat, disturbance, and displacement. This is also a violation of the MEDL-EA statements to comply with Forest Plan standards and guidelines to protect wildlife habitat, to protect sensitive wildlife and plant species, and heritage resources.

It is not sustainable to build another new trail in an undisturbed area when the CNF historically is unable to manage its existing trails. This is one of the remaining refuges for

wildlife, as well as a relict vegetation area from the 1977 Mt Elden Radio Fire. In addition, this general area contains many archeological sites, which will be negatively impacted by the increase in human visitation.

Please note: 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, the planned Equestrian Trail system, plus existing and planned Sandy Seep trails, 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, and planned Elden Base Trail).

Please do not disturb this undeveloped area of Mt Elden with yet another new trail that will bring more human disturbance into Mt Elden's diminishing and rare natural habitat.

In order to resolve this Objection, we request that CNF remove this trail from the MEDL-EA plan and leave this area of Mt Elden undisturbed.

To comply with (36 CFR 218.8(d) #4: This Objection #3 resolution project is named "Removal of Hiker-only trail in Mt Elden's inner basin"; Coconino National Forest; Flagstaff Ranger District; the title of the responsible official is Matt McGrath, Flagstaff District Ranger.

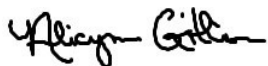
Sincerely,

Joseph Shannon



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

Alicyn Gitlin



Sierra Club – Grand Canyon Chapter