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Protect the Grand Canyon Ecoregion Campaign  
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Paul Dawson  
Flagstaff Ranger District  
5075 N. Highway 89  
Flagstaff, AZ 86004  
Submitted via email to: [comments-southwestern-coconino@usda.gov](mailto:comments-southwestern-coconino@usda.gov)

Re: Flagstaff Outfitter and Guide Project

Dear Mr. Dawson:

Thank you for the opportunity to comment on the *Flagstaff Ranger District Prospectus for Outfitter Guide Services*, also referred to as the *Flagstaff Outfitter and Guide Project* (hereafter, “proposed action”).

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.” The Grand Canyon (Arizona) Chapter has a long history of working to protect northern Arizona’s forests from old growth logging and harmful recreation projects, in particular advocating for cultural respect within the San Francisco Peaks Traditional Cultural Property (TCP) and safeguarding Mount Elden and Dry Lake Hills (MEDL) from ecological harm.

For decades, we have encouraged the Coconino National Forest (CNF) to keep harmful mining and recreation projects out of the TCP and we engaged with the CNF for years in an effort to create a sustainable Mount Elden / Dry Lake Hills Recreation Planning Project (MEDL project). We have been an active participant in Four Forests Restoration Initiative stakeholder meetings for a decade now, and also advocated for a more sustainable Flagstaff Watershed Protection Project. Our 13,000 members and supporters have a significant interest in the proposed action and all projects that affect this culturally and ecologically vital area. Our members live near, appreciate the wildlife and cultural values of, and recreate in the TCP and MEDL landscape.

**The Coconino National Forest must protect forest resources.**

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 contains “sensitive wildlife habitat” and is already subject to “overuse”. (MEDL project Environmental Assessment (MEDL EA) at 3, 5, 18) The entire area is within the San Francisco Peaks Traditional Cultural Property, meaning that it holds a vital significance that supersedes

recreational and economic value for the 13 officially affiliated Tribes and probably others as well. Furthermore, this fragile area is extensively damaged by wildfire, logging, and post-fire flooding, in addition to climate change effects and recreational resource damage. This project will have cumulative effects with the MEDL Recreation Plan and will increase the number of trail users, causing “a measurable increase in the level of disturbance to owls,” “an increase in the level of disturbance of nesting peregrine falcons,” and “an increase in disturbance of foraging northern goshawks and impacts to prey”. (MEDL EA at 42-43, 47, 49-50)

Flagstaff promotes its climate and Forest Service access and accommodates more than 5.5 million visitors annually.<sup>1</sup> According to a 2017-18 Northern Arizona University Franke College of Business study, 20.3% of Flagstaff’s visitors said that hiking, mountain biking, and national forest recreation was “Most definitely a reason” for their trip.<sup>2</sup> Twenty percent of 5.5 million visitors, in addition to our local residents, equates to more than 1.1 million people who have been flocking to our trails each year without needing commercial guiding services.

Limited forest capacity and the currently overwhelming numbers of forest recreational users are a critical reason that commercial guiding activities are not needed in the already overcrowded and severely damaged small area of MEDL. Between the Shultz, Chimney, Museum, Tunnel, and Pipeline fires, along with industrial logging operations including helicopters, and subsequent flooding and flood stabilization projects, there have been ongoing largescale landscape disturbances in the San Francisco Peaks and MEDL area for more than a decade. It is glaringly apparent that MEDL does not have sufficient acreage to allow for current recreation numbers, let alone adding commercial guiding and its associated advertising, while sustaining the already diminished forest resources and wildlife habitat. According to the CNF, this proposed action will increase the number of people within the MEDL area: “Once completed the plan will increase the number of people using trails in the project area.” (MEDL EA at 42)

The MEDL area and the adjacent San Francisco Peaks are extremely small compared with other comparable mountainous recreational regions in national forests throughout the western US. The MEDL area “amenities” are frequently compared to mountainous Colorado areas. As population grows, recreational demands will continue to increase. We ask the CNF to follow the USFS guiding principles of advocating a conservation ethic and using an ecological and scientific approach for your decisions.<sup>3</sup>

Although the Forest Service has a “multiple use” mandate, it is required above all else to protect Forest resources:

- (a) “Multiple use” means: The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; ...that some land will be used for less than all of the resources; and harmonious and coordinated management of the

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<sup>1</sup> Arizona Office of Tourism and Northern Arizona University The W.A. Franke College of Business. 2017-2018 Flagstaff Visitor Study. Available at [https://tourism.az.gov/wp-content/uploads/2019/06/3.4\\_CommunityStudiesAndAssessments\\_Flagstaff-Tourism-Study-2017-2018-Final.pdf](https://tourism.az.gov/wp-content/uploads/2019/06/3.4_CommunityStudiesAndAssessments_Flagstaff-Tourism-Study-2017-2018-Final.pdf), accessed 1/13/23; National Tourism Week. Available at <https://www.flagstaffarizona.org/tourism-matters/>, accessed 1/13/23.

<sup>2</sup> Table 17 on p. 25 in Arizona Office of Tourism and Northern Arizona University The W.A. Franke College of Business.

<sup>3</sup> US Forest Service. 2020. What we believe: Guiding Principles. Available at: <https://www.fs.usda.gov/about-agency/what-we-believe>, accessed 1/11/23.

various resources, each with the other, *without impairment of the productivity of the land*, with consideration being given to the relative values of the various resources, and *not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output*.

- (b) “Sustained yield of the several products and services” means the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the national forests *without impairment of the productivity of the land*. (Public Law 86-517, Sec. 4, italic emphasis added)

It is unlikely that MEDL and the San Francisco Peaks have sufficient acreage to allow for continued expansion of recreation use and infrastructure while also protecting critical habitat for endangered and threatened species, as well as keeping cultural areas intact. We object to the commercialization of this resource at the expense of wildlife, cultural, and other forest resources.

#### **The proposed action does not qualify for a Categorical Exclusion (CE).**

The proposed action does not qualify for a Categorical Exclusion. This controversial proposed action will occur within the TCP and will have effects on Federally listed and Forest Sensitive species. (36 CFR 220.6 (b)(1)(i, vi, vii); (MEDL EA at 42-43, 47, 49-50)) The location has American Indian religious and cultural sites, archaeological sites, and historic properties or areas. (36 CFR 220.6 (b)(1)(vi, vii)) The CNF Land and Resource Management Plan (2018) says of the Mount Elden Management Area: “This area is unique in having the highest number of archaeological sites within the entire ponderosa pine zone of the Coconino NF” and specifically mentions “traditional significance to the Hopi.” (CNF Plan at 138) According to the MEDL EA, the CNF has already determined that the proposed action will have an effect on resource conditions, and therefore must prepare an environmental assessment or environmental impact statement. (36 CFR 220.6 (b)(2); MEDL EA at 42-43, 47, 49-50) The CNF should also conduct Tribal consultation and ensure that Tribal members are aware of and able to comment on the proposed action.

The MEDL recreation plan was proposed to respond to overuse of the forest within the MEDL area, and in the MEDL EA, the Forest Service specifically said that the use of outfitters and guides would bring *additional* increased impacts: “The Forest’s 2018 *Recreation Special Use Management Plan* identified the needs and capacity for outfitter/guide services on the District. The plan recommends up to 16,700 user days [sic] for the project area... Once completed the plan will increase the number of people using trails in the project area. Increased use of trails will have additive impacts to disturbance of owls in the project area.” (MEDL EA at 42; similar statements are repeated in regards to peregrine falcons and Northern goshawks too: MEDL EA at 47, 49-50)

Further, the Coconino National Forest should analyze the proposed action with an environmental assessment or environmental impact statement because it already committed to

doing so. Sierra Club raised concern with this exact issue in its comments on the MEDL EA and in our objection letter. (Sierra Club letter dated June 29, 2021 at 4-5; Sierra Club letter dated December 22, 2021 at 3-4) In its response to commenters who brought up outfitting and guiding in their comments on the MEDL EA, the Forest Service promised to analyze the impacts of this action: "This [MEDL Recreation Planning] project does not analyze or authorize outfitter and guide operations. A future process *will analyze* the use of outfitter guides including the effects and appropriateness of shuttling." (MEDL EA at 124, italic emphasis added) The scoping notice contains no analysis. In the Coconino National Forest response to Sierra Club's objection letter, the Forest Service asserted that, "When planning efforts for commercial outfitting and guiding begin, the public would be informed *and engaged to participate in that process.*" (Coconino National Forest letter dated February 8, 2022 at 2, italic emphasis added; the statement is reiterated at 3)

The Coconino National Forest has already stated that the proposed action will have an effect on resource conditions, and that a full analysis including public engagement is pending. Because this project is located within the TCP, in an area with high archaeological site density, and within the habitat of Federally listed and Forest Sensitive species that will be affected by the proposed action, an environmental assessment or environmental impact statement is necessary. The proposed action is controversial and will individually and cumulatively have a significant effect on the environment.

**The proposed action is not in compliance with the Forest Plan and is inconsistent with the Need for the MEDL EA.**

The CNF Plan is very specific in its Management Approaches that "a determination of need and capacity" for outfitter-guide and event permits "in areas with heavy recreation use by the general public" should be complete "[p]rior to considering outfitter-guide permits", and that a forestwide or districtwide management plan for administering these permits should also be complete:

Prior to considering outfitter-guide and recreation event permits, complete a determination of need and capacity in areas with heavy recreation use by the general public prior to considering outfitter-guide and recreation event permits.

Develop a forestwide or districtwide management plan for administering special use permits. (CNF Plan at 108)

The CNF has not analyzed nor determined need and capacity for outfitting and guiding in the MEDL area. In the response to comments in the MEDL EA the CNF committed to analyzing this use: "This project does not analyze or authorize outfitter and guide operations. A future process will analyze the use of outfitter guides including the effects and appropriateness of shuttling." (MEDL EA at 124) The CNF promised to perform the analysis during and after publishing the 2021 MEDL EA so the Forest Service should not respond to this comment with a claim that the 2018 Recreation Special Use Management Plan was actually the analysis it was referring to. However, we cannot help but point out that the "need" or demand for Jeep or OHV tours was

determined in the Recreation Special Use Management Plan to be low. (Recreation Special Use Management Plan at 4)

Importantly, this proposed action is not compliant with the following Forest Plan Guidelines:

To improve resource management and promote recreation opportunities, outfitter-guide permits should only be issued for activities that have demonstrated public need, promote transportation services, or improve public safety. *Any new permit should maintain or increase protection of cultural or natural resources.* (CNF Plan at 107, italic emphasis added)

The MEDL EA revealed that this project will actually decrease protection of natural resources, causing cumulative effects with the MEDL Recreation Plan, increasing the number of trail users, and creating “a measurable increase in the level of disturbance to” owls, prey species’ habitat, peregrine falcons, and foraging goshawks. (MEDL EA at 42-43, 47, 49-50).

The proposed action is also contra to the following Forest Plan Guideline:

To prevent compaction of soils and overutilization of popular areas, outfitter-guide activities, such as motor vehicle use and camping, should be excluded from areas with sensitive resource issues, such as a high density of archaeological sites, sensitive wildlife areas (including riparian areas or areas with sensitive or rare plants), and adjacent to urban areas. (CNF Plan at 107)

The proposed action is in an area with “sensitive resource issues”, “a high density of archaeological sites” and “sensitive wildlife areas,” and is also “adjacent to urban areas.” There are Federally listed and Forest Sensitive species present and, according to the CNF Plan, “This area is unique in having the highest number of archaeological sites within the entire ponderosa pine zone of the Coconino NF.” (CNF Plan at 138) The area is directly adjacent to urban areas of Flagstaff and is considered by many to be an easy local forest area to access. Many people walk, bike, or ride horses directly from their homes to the MEDL area.

The proposed action is also contra to the need for the MEDL EA. The CNF created the MEDL EA to respond to overuse:

The number of visitors to Flagstaff and Northern Arizona tourism has increased over the last several years, leading to a steady increase in recreational use in this area. This increased use is taxing the current trail system and associated facilities. Indicators of overuse include deteriorating condition of system trails, development of unauthorized trails, and increased concerns for impacts to natural resources such as wildlife, watershed and soil conditions, recreational experiences, and vegetation. (MEDL EA at 3)

CNF made a commitment in the MEDL EA and the Forest Plan to take a management approach that would include public collaboration and avoid adverse impacts. CNF must engage the public,

including local residents, so that it can understand their concerns and not take actions that will harm the resource or community.

Guidelines include:

To reduce social conflicts, all special use activities should occur during times, in ways, and in locations that are consistent with the needs of national forest users while addressing disturbance and safety concerns for area residents. (CNF Plan at 106)

Management approaches include:

Engage in strong community partnerships for stewardship of the Mount Elden MA to support resident health, safety, and quality of life.

Collaborate with local governments, agencies, and residents to protect resources and address local concerns. (CNF Plan at 140)

Commercial Guiding is counter to 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. Commercial guides will advertise the resource in order to make a profit, drawing more people to the area. The MEDL trails are already crowded with do-it-yourself users; commercial outfitters are not needed to guide trail users.

The CNF says that the project will increase the number of trail users:

Once completed the plan will increase the number of people using trails in the project area. Increased use of trails will have additive impacts to disturbance (MEDL EA at 42)

Commercial Guiding is also counter to the Coconino National Forest Plan 2018 Desired Condition:

Recreation opportunities are balanced with the capacity of forest resources to support them. (CNF Plan at 109)

The CNF cannot justify allowing increasing use and permitting outfitters and guides in an already overused and overcrowded area.

### **The CNF must disclose the calculations used to determine Service Day capacities.**

It is very concerning that the Recreational Special Use Management Plan, which the CNF is using as their basis for promoting Commercial Guiding and 65,700 service days in the MEDL area, is vague and provides insufficient information. This Plan 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.” (Recreation Special Use

Management Plan at 7) However, there is no transparency as to what models and/or rationale were used to derive the suggested number of service days or at-one-time limits. This secretive process is not a justifiable basis for determining commercial service days in such a small fragile area, especially in light of today's unprecedented environmental deterioration, overcrowding, wildfires, floods, and climate change.

We find the determination of MEDL service day allotments and the majority of the Recreation Special Use Management Plan to be lacking in scientific metrics for calculating service days and at-one-time limits. The Recreation Special Use Management Plan neglects to include important scientific examination of regional forest differences in landscape and environmental conditions as related to the assignment of service days. For example, the CNF Recreational Management Plan lacks any examination of climate crisis, logging, wildfire and flooding impacts, fragility of the MEDL area, existing negative recreation impacts, and overcrowding in the MEDL area. The Forest Service must disclose the source of its numbers for service day capacity and users at-one-time, and demonstrate that it considered interacting effects when devising those numbers.

The Recreation Special Use Management Plan says, "Unguided use has already been accounted for and is not included in these numbers." (Recreation Special Use Management Plan at 8) What are the numbers already accounted for? We have been unable to find those numbers in the MEDL EA. The CNF should provide the numbers for unguided use that have already been accounted for.

It is alarming that the number of available service days for MEDL is the same as for Cosnino. Cosnino contains the Cinder Hills OHV Area and is treated as a type of "sacrifice zone" with extremely high levels of motorized and OHV use that leave scars across miles of cinder landscapes. (Recreation Special Use Management Plan at 11, 18) The two areas are vastly different, and their impacts on adjacent residences are also vastly different. The Cosnino area is accessed primarily via the mostly unpopulated 776 Road off Highway 89. Highway 89 is a road where traffic tends to move with some consistency. In contrast, the MEDL area is mostly accessed through dense neighborhoods (Schultz Pass Road, Mt. Elden Lookout Road, Paradise Road; Elden Springs Road is more rural but also passes through a residential area) and via congested traffic areas such as Route 180. Route 180 tends to back up to a standstill due to Snowbowl traffic in the winter and the presence of an elementary school where children and families are trying to safely cross the street and pull through the parking lot along with school buses twice a day. The MEDL area also has a limited parking volume, confined by topography. CNF must offer the justification for determining that the MEDL area can accommodate the same numbers of commercial users as Cosnino.

We also wonder if the Management Strategy to "Encourage recreation events to stage out of Buffalo Park," is practical when the Buffalo Park parking lot fills to overflowing daily in the summer and the access to much of MEDL from that location would require a long hike or technical bike ride. (Recreation Special Use Management Plan at 18) Statements such as this emphasize the need to conduct a public process, with an environmental assessment or environmental impact statement prepared by people who understand the local landscape, and including the input of local community members and forest users.

The CNF must conduct, at the minimum, an Environmental Assessment regarding any Commercial Guiding in the MEDL area. The CNF must offer evidence that it considered the

following when deriving service day and at-one-time user numbers: existing conditions in the MEDL area; the current climate crisis; current overcrowding; changes in wildlife habitat and migration corridors from recent wildfires, recent logging projects, flooding, and existing negative impacts from unsustainable recreation.

As the Forest Service states, Forest Service policy requires that “outfitter/guide use be managed in relation to recreation capacity and public need.” (Scoping notice at 1) The CNF must disclose all models and inputs used to determine recreation capacity, providing current and up-to-date scientific research references. CNF should disclose how old the metrics and models used to determine service days are. Are all national forests lumped into predetermined land capacity categories, or is there a localized scientific basis? What were the geographical, environmental, and ecological landscape bases for the capacity amounts? The CNF must place a high importance on the needs of the wildlife, and on other landscape resources, in particular the protection of the values for which the TCP was established.

### **The CNF must disclose how outfitter/guide permitting will proceed in the future.**

The Scoping notice discloses that the Recreation Special Use Management Plan “identified a total of 65,700 possible service days” and that the current number of service days requested is less than 6,000. (Scoping notice at 1) The notice also discloses that there are more requests than are currently being considered; nine applications were received and seven are being considered. (Scoping notice at 1) The CNF must disclose what the process will be for evaluating future requests: will the CNF be able to approve 65,700 service days in the MEDL area under Categorical Exclusions?

The Scoping notice also is very unclear about the location(s), purpose, and number of motorized tours. (Table 1 in Scoping notice at 3) It is unclear whether this proposed action would enable 1,500 individual vehicles or if it would enable 1,500 clients to be moved via vehicle into the area. The Recreation Special Use Management Plan specifies that the CNF could choose its metric:

A service day is defined as one client on the national forest for any part of one day. It is the standard unit of measure for outfitter/guide permits. The district could develop a different measure in cases where it may be appropriate. For example, a jeep tour has the same impact whether it has one client or six; in the case of jeep tours use could be allocated in terms of the number of vehicles rather than service days. (Recreation Special Use Management Plan at 8)

The CNF must disclose how it intends to deal with this issue in the future.

## **Proposed Solutions**

Rather than allowing the negative impacts associated with this proposed action, the CNF could authorize a small number of non-profit educational institutions to conduct activities in the MEDL



area for the purposes of education and/or resource conservation. These activities should not be motorized activities.

After the CNF conducts the “determination of need and capacity in areas with heavy recreation use by the general public,” using justifiable and transparent metrics, and “Develop[s] a forestwide or districtwide management plan for administering special use permits,” as required by the CNF Plan (CNF Plan at 108), the CNF could issue permits for specific entities to conduct a limited number of educational or learning events within the MEDL area that are not motorized activities.

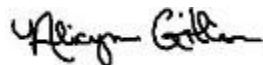
The CNF should inventory wildlife and cultural sites and ensure that all these educational or conservation permits avoid sensitive areas, including springs, caves, and bat habitat. There should be a cap on service days and users at-one-time established prior to issuing any future authorizations for these activities.

The CNF should commit to promoting a wild, unmotorized, and self-guided recreational experience in the MEDL area. According to the table on pp. 104-105 of the MEDL EA, the CNF “heard positive comments from hundreds of recreationists, who also request a permanent closure of Elden Road above the gate.” The closure of Mt. Elden Lookout road gave recreationists “an opportunity to realize how much more peaceful and safer that road is without motorized vehicles;” users “[s]upport closure of Elden Lookout Road;” etc. In its upcoming update to its Travel Management Plan the CNF should close Elden Lookout Road to all but administrative use and develop a permitting and gate system to allow only those with a disability plate or other specific need to drive to the top of the road. Shuttling should not be authorized.

The CNF should work with Coconino County to move commercial clinics that teach mountain biking skills to Fort Tuthill County Park and the Fort Tuthill Bike Park. The Forest should create rest periods when no organized activities at all occur within the TCP.

Thank you for your time. Please keep us informed of the progress on this project.

Sincerely,



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