

Kerwin Dewberry, Forest Supervisor
Coronado National Forest
ATTN: Objections
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November 5, 2018

Re: Tumacacori Red Springs Single Track Trail System

David Hodges and Natural Allies hereby submit this Objection to the U.S. Forest Service's Draft Finding of No Significant Impact and Draft Decision Notice (Draft FONSI/DN) for "Tumacacori Red Springs Single Track Trail System" on the Nogales Ranger District of the Coronado National Forest. The 45th day fell on Saturday November 3rd, so we are providing this Objection on the first business day following.

This Objection is filed pursuant to, and in compliance with, 36 C.F.R. Part 218, Subparts A and B. All parties to this objection have filed timely, specific and substantive written comments in accordance with 36 C.F.R. 218(a).

As required by 36 C.F.R. § 218.8(d), Objectors provide the following information:

1. David Hodges is the Lead Objector for purposes of communication regarding the Objection.

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2. The project that is subject to this Objection is the "Tumacacori Red Springs Single Track Trail System" on the Nogales Ranger District of the Coronado National Forest.
3. Objector submitted extensive, timely, specific, and substantive comments during the Proposed Action Public Comment Period. All points and issues raised in this objection refer to issues raised in these documents, with the exception of new information related to a change from the old to the new forest plan by the district during the analysis of this project.
4. In the following Statement of Reasons, Objectors provide the specific reasons why the decision is being appealed and the specific changes or suggested remedies that we seek, along with the related evidence and rationale on why the decision violates applicable laws and regulations.

The Proposed Action does not adhere to the Quiet Recreation emphasis found in the new Coronado Forest Plan and violates the land use zones created by the new Plan
The Proposed Action is not suitable as defined by the Desired Conditions and Guidelines provided for the land use zone identified as Roaded Backcountry.

It is suitable for the land use zone identified as Motorized Recreation in the new Forest Plan.

According to the new Plan, “Under the proposed action, the Wild Backcountry Land Use Zone provides opportunities for solitude and challenge. **The Roaded Backcountry Land Use Zone provides for dispersed motorized** and nonmotorized recreation activities, while the **Motorized Recreation Land Use Zone provides specific areas in three ecosystem management areas for off-highway vehicle recreation.**

This project is both focused and intensive motorized recreation, not the “dispersed motorized recreation” allowed for in the Roaded Backcountry zone.

Desired Conditions for Roaded Backcountry are as follows: **“Settings are natural and there are very few permanent facilities, except where needed for homeland security or to meet statutory requirements.** Opportunities for quiet recreation exist both away from roads and along many less heavily used routes. Dispersed campsites are clean, and impacts from campers are minimal. National Forest System roads **provide access** to trailheads; remote, undeveloped camping areas; and occasionally developed recreation facilities or administrative sites. Most roads are unpaved. Forest visitors can enjoy semiprimitive motorized recreation and explore the backcountry in off-highway vehicles along designated roads or motorized trails. Recreation opportunity spectrum classes in this land use zone are semiprimitive nonmotorized, semiprimitive motorized, roaded modified, and roaded natural except where there are small, remote administrative sites, developed recreation sites, and permitted facilities.”

This project is not needed for homeland security nor is it needed to meet statutory requirements, nor is it needed to access developed recreation facilities or administrative sites. Additionally, at 24 miles and thousands of acres committed to this project, it does not meet the definition identified in the above paragraph, as “small.”

The general description for Motorized Recreation is **“this land use zone is assigned to areas that have a high level of motorized use.** Two different types of motorized use areas are included in this zone: highway corridors that cross Coronado National Forest lands (where vehicles are traveling at high speeds and most travelers are simply passing through the national forest) and off-highway vehicle corridors (where facilities for off-highway vehicle use are provided). This zone provides a wide variety of recreational experiences—including

driving for pleasure—while mitigating effects of motorized use and minimizing conflicts with other users.”

Desired Conditions for Motorized Recreation are as follows: “In off-highway vehicle (OHV) corridors, forest visitors can enjoy semiprimitive motorized recreation and explore in OHVs along designated roads and routes. **Long distance loop routes exist that provide varying experiences for different vehicle classes. Separate motorized trails (such as single-track motorized trails for dirt bikes and all-terrain vehicles (ATVs)) exist to minimize conflicts among OHV types.** Where nonmotorized trails traverse this land use zone, adequate signing and enforcement deters motorized use of these trails. **OHV and ATV use is concentrated in defined areas that promote a high quality, motorized use experience.** The sights and sounds associated with OHV use are only incidentally apparent outside of these areas.” Emphasis added.

When looking at these two distinct land use zones, it is clear the Motorized Recreation Zone would be appropriate for this project, while such an intensively focused motorized recreation project as proposed, is not appropriate for this land use zone, nor is it compatible with the Quiet Recreation focus of the new Forest Plan.

You have not provided sufficient evidence as to the Need for this project

In reviewing the 2012 National Visitor Use Monitoring results for the Coronado National Forest (CNF), one finds that ATV use is quite small compared to other lower impact recreational activities. The four most common reasons for the public visiting the CNF are Hiking/Walking (67.4%), Viewing Natural Features (57.9%), Viewing Wildlife (50.9%), and Relaxing (41%). All of these activities are incompatible with high impact and excessively loud recreation.

One has to go all the way down to Number 15 to find Motorized Trail Activity (2.2%) and Number 16 to find OHV Use (2.1%). One would have to assume there is tremendous overlap between these two groups. Even adding these two groups together, would only add up to 4.3% of forest visitors. Furthermore, ATV’s are a subset of ORV’s, and dirt bikes would be an even smaller subset ATV users - certainly, much less than 1 percent.

We do not understand why there is a Need to provide recreational opportunities to the less than one percent of forest users, **who have a disproportionately negative impact on the majority of forest users who come for a quiet recreational experience.**

The NVUM information referenced above would indicate a much greater Need for hiking trails on the Tumacacori EMA, than for a motorized dirt-bike playground. The forest-wide ratio of roads to trails prior to the ongoing Travel Management process was 12 to 1, **which is much too low for a forest with a Quiet Recreation emphasis (as identified in the new Coronado National Forest Plan).**

The district attempts to address this issue by comparing the 88 miles of trails found on the district, with a lack of single-track trails. This ignores the fact that very few of the 88 miles of

trails are found on the Tumacacori EMA, and, that motorcycles are permitted on all open roads on the Nogales Ranger District. **This explanation of Need is not sufficient.**

You state the *“purpose of this project is to provide a distinct backcountry touring experience for motorcycles to address a growing demand for single-track trails that are currently underrepresented on the CNF.”* The EA provides no evidence to substantiate this statement. In fact, the National Visitor Use Monitoring results referenced above, would suggest the opposite. Just because special-interest clubs in Tucson state this, does not make it true. Perhaps it is true that demand has increased within those clubs, but this is different from a public demand for single-track use. Your response to comments did not address this issue. As such, **the EA has continued in its failure to show a Need for this project.**

A key foundation upon which Need is based, is flawed.

The EA states *“this project is socially sustainable as it is the culmination of a collaborative process developed and supported by diverse recreation user groups.”*

The “diverse recreation users” have been identified in the Final EA on page 4 and they are the following: Trail Riders of Southern Arizona, Tucson Off Road Cyclists and Activists (TORCA), Arizona Trail Riders, County Line Riders of Catalina Inc, Dual Sport Riders, AZ Beemers Club, Coconino Trail Riders, Pedals, Pistons, and Hoofs, Off Camber Motorcycle Club, VP Rockstars Motorcycle Club, Ventura County Motorcycle Club, and Kingman Trail Riders of Mohave County.

This was not a collaborative process developed and supported by diverse recreation user groups, but rather a single-issue focused user-group. The EA and Decision Notice should not reflect this inaccurate depiction of this process.

The Coronado National Forest lacks law enforcement capacity to manage this project.

In the first section of the Proposed Action, the EA talks of current unauthorized social trails and suggests the Proposed Action is the best means of addressing this. Under Monitoring, the EA states *“Forest Service Law Enforcement Officers will patrol the area to ensure recreational users are staying on designated trails and adhering to other federal laws.”*

Of additional interest are statements found later in the EA, which contradict the idea the District has law enforcement capacity to adequately monitor this area for illegal activities.

From the EA: *“However, the Forest Service faces a future dilemma in enforcing the motorized use. Currently, only one law enforcement officer patrols some 350,000 acres with dual responsibilities for resource protection and illegal activity associated with the international boundary.”*

I trust you recognize that the above statement is very different and very much in conflict with, *“Forest Service Law Enforcement Officers will patrol the area to ensure recreational users are staying on designated trails and adhering to other federal laws.”*

The following two statements were received in an email (January 25, 2018) from district personnel and are an honest acknowledgement that the district cannot manage current levels motorized recreation, much less adding more.

“Also, there exists unauthorized motorized use all over the District and our law enforcement coverage is minor at best.”

“Furthermore, unauthorized use will likely continue on the District.”

Additionally, in a recent Coronado Conversations (November 3, 2018) meeting, the district ranger clearly acknowledged the significant lack of law enforcement capacity on the Nogales Ranger District, and did so in the context of off-road vehicle management.

Why would the District add a motorized recreation area that would draw people not only from Arizona, but from other States as the EA suggests, while lacking the capacity to adequately manage the activities that are currently permitted? **This valid management concern has not been adequately addressed by the Coronado National Forest.**

It is naive to think all these motorized users will stay on marked routes. You are meeting with organized ATV groups. These are the people most likely to obey the rules but in reality, represent a small percentage of ATV users. Most people who would utilize this motorized playground will not be associated with an organized group. **History tells us exactly what will happen here, if this project were to go through.** Deep-down, we all know this would become and even heavier impacted area, while doing little to alleviate user-conflicts elsewhere on the EMA.

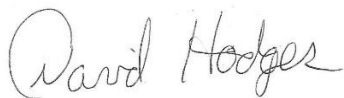
The EA mentions mitigation but what has been presented is not adequate. This section needs better discussion, with specific mitigation activities being tied specifically to those issues that need mitigating.

This project will increase invasive species in the area, despite your best intentions.

If you are requiring contractors (and others working to create this trail system) to clean their equipment to prevent the transferal of invasive and/or exotic seed to the project area, the same requirements should be in place for users, who represent as great, or greater a risk for the spread of invasive vegetation.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "David Hodges".

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