

December 17, 2021

Dear Forest Supervisor Laura Jo West:

This message contains objections to the draft decision of the Mt. Elden/Dry Lake Hills Recreation Planning Project, Coconino National Forest, Flagstaff Ranger District, 5075 N. Hwy 89, Flagstaff, AZ 86004. Responsible Official: Matt McGrath, District Ranger. Submitted via email to [objections-southwestern-regional-office@usda.gov](mailto:objections-southwestern-regional-office@usda.gov).

I appreciate the opportunity to comment/object on this pre-decision for the Mt. Elden/Dry Lake Hills Recreation Planning Project, and I also appreciate the significant time and effort that has been applied to obtaining comments, review, and adjustments. I would like to offer the following objections/comments for your consideration.

#### Lost Burrito Trail

I am grateful to see the plan has been amended so there is now one intersection with the "hiker only" (potentially historic) Lost Burrito trail and the multi-use trails (the Schultz Loops and the Schultz Dry Ridge Climb) instead of the previous three intersections. However, I still object to this intersection. Page 13 of the EA states that the Lost Burrito would be a "Forest Service class 2 trail designed for hiking, and closed to all other uses." But there is no mention of how bikes will be prohibited from the Lost Burrito. As we have seen in numerous unfortunate cases, some bikers will go where they are not supposed to go, especially if the trails head downhill (where damage can happen quickly from locked, sliding bike tires on steep, loose, gravelly trails such as the Lost Burrito). I am concerned that the intersection of these trails will probably be one of those places. A solution to this would be to eliminate this trail intersection by closing the Schultz Creek Loops at the NE end so all of the loops stay on the west side of the Lost Burrito. The Schultz Dry Ridge Climb could be accessed by a set of switchbacks going up to it from the Rocky Ridge Trail east of the Lost Burrito. The elimination of this intersection will actually make this a "hiker" trail as indicated in the EA. Otherwise, it will be a hiker trail in name only which does not fulfill what is stated in the EA. Please note that the other "hiker only" trails in the plan (Sandy Seep Elden Climb, Elden Lookout, and Devil's Chair) do not have any intersections with multi-use trails. The Lost Burrito should be the same as these other "hiker only" trails.

Please note that there are 10 blazed trees along this trail that could well indicate historic use. We should be treating this trail more carefully until we understand the potential history completely.

I also think there will be a problem with bikes entering the top end of the Lost Burrito where it intersects with the Schultz Dry Ridge Climb, Ginger, and Brookbank trails. The temptation for bikers to go downhill on the Lost Burrito will likely be too much for some to ignore. If the intersection discussed above is removed and bikers know they cannot access the other multi-use trails from the Lost Burrito, the temptation to go down the Lost Burrito would likely be lessened. Some sort of unobtrusive gate installed at the top end that would be too small for

bikes to navigate might also help. Without these measures (especially the removal of the intersection), I fear the Lost Burrito will not be a “hiker only” trail and therefore does meet what is described in the EA.

I am including my previous comments below to fulfill the requirement that these objections are connected to them. My previous comments about the Lost Burrito are on page 5. And for the record, I still stand by all of my previous comments.

Again, thank you for the vast amount of work on this project and for responding to public comments.

Sincerely,  
Jen Blue



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Originally sent September 28, 2020, resent June 24, 2021

Dear Mr. McGrath,

This document contains comments that I sent last time around. Since most of my comments/concerns remain unchanged, I am sending it again with the most pressing comments highlighted in yellow.

The comments below are in response to the Mt. Elden/Dry Lake Hills proposal/EA.

**General Comments:**

**Too many trails:** I have been walking somewhat intensively in the MEDL area for about 30 years so I have experienced how use of this area has changed over a long period of time. The cover letter for the project states that this area is the “most popular and heavily used recreation area on the Flagstaff Ranger District.” I agree with that and in fact the Dry Lake Hills (DLH) have become so popular and so crowded that I rarely go there anymore because it is a virtual madhouse at times (especially weekends). I find this proposal quite distressing in that it takes a crowded, popular area (which is already Disneyland-like) and adds up to 41.5 miles of new trails (if I’ve added correctly), not counting the urban trails and the adoption of illegally-built trails. I can’t even imagine how congested this area would be if all of these trails were built. Many of the alignments are redundant and unnecessary, fragment the landscape, and would make it virtually impossible to find a quiet place. Is this what we want from our public lands?

**Add FTI to the PA:** The Proposed Action mentions the Flagstaff Trails Initiative (FTI), but does not give details about how many new trails are proposed in FTI. The reader of the MEDL PA

should know that there are many, many miles of new trail proposed for the Flagstaff area through FTI and that MEDL is not the only opportunity for new trails.

**Plan around wildlife:** I'm very concerned about how all of these new trails will fragment the landscape and therefore negatively affect wildlife. Wildlife should be the very first consideration in a proposal such as this and we should be leaving large tracts of non-trailed areas. In early September, I saw my first bear in Arizona in the DLH and at the time I thought his habitat is already limited and impacted by humans. I can't imagine what the impact will be if all of these trails are built. We should start any trail planning with determining wildlife needs and add human recreation only in areas that do not affect the wildlife.

**Impact of visitors on forest and fire:** I'm also very concerned about the potential influx of people with the addition of all the new trails. This summer, our forests were packed with visitors from elsewhere and this project has the potential to make it even more crowded. I saw larger camps and more camps than I have ever seen in the Coconino National Forest. We have seen new levels of trash being left in the forest and more people also means an increased threat of wildfire. Does the USFS have a plan for how to accommodate the potential substantial increase in campers, trash, and for keeping the area safe from fire (and post-fire flood)? If so, this should be explained in the PA.

**Do not adopt illegally-built trails:** Adoption of intentionally-built illegal trails absolutely sends the wrong message. How many times have we seen illegal trails built and then adopted only to have more illegal trails built? Perhaps the way to approach this problem is to make it policy that all illegal trails will be removed. This would send the message that this kind of activity will not be tolerated. The USFS should take a strong stand on this.

**Label maps and rename trails:** Since you are asking for comments on your proposals about specific trails, I suggest that you add labels to the maps in the Scoping Proposed Action. I understand there are labels on the high-resolution map, but since you refer to Figures 2 through 5 in the proposed action, it would help the reader to have those maps labeled. Additionally, I would suggest that for any system trails you use "geographic" names like Schultz Creek, Brookbank, Weatherford, etc. instead of the names of some of the illegal trails, which tell the user nothing about where the trail goes on the landscape. Using the present names of the illegal trails also puts feathers in the caps of the people who broke the law by building the trails, and, I assume, named them.

**Downhill trails are not sustainable:** There is a fair amount of discussion about rerouting trails for "sustainability" yet there are quite a few bike-only "downhill" trails that go straight downhill in or near drainages and look to be extremely unsustainable. The USFS should not be proposing such unsustainable trails. If these trails are sustainable, then the proposal should explain how they are sustainable.

**Do not direct people to the Sandy Seep area:** I'm very sorry to read that Sandy Seep TH is proposed to be upgraded to "draw users away from Mt. Elden Lookout TH." The Sandy Seep

area is the last somewhat quiet area. The rest of the MEDL area is so busy and congested that, as mentioned above, I rarely hike there these days. I have instead opted to spend time in the Sandy Seep area and I am very sad to hear that the idea is to direct hordes of people there.

**Value solitude and quiet:** Why are we not valuing solitude and quiet? The PA mentions that “the desired condition is a trail system that provides diverse opportunities for recreation activities....” Solitude and quiet are recreation opportunities that are not being addressed in the PA. One of the key findings from the FTI process was, “Over 58% of Coconino County residents report hiking, backpacking, mountain biking, and horseback riding at least once each year. Hiking is the most popular trail activity, accounting for more than half of all trips.” And later in the FTI document, “Four out of five respondents to a fall 2018 FTI survey said they *value the feeling of solitude and peace trails offer*.” This kind of trail experience is not mentioned in the PA and in fact the existing opportunities for solitude and quiet will be shattered by the PA.

**USFS mission is not to respond to “demand”:** The PA uses the word “demand” when addressing public desire for recreation. It is not the responsibility of the USFS to respond to demand. The USFS mission statement on the Internet is, “To sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” Do future generations deserve a landscape fragmented with a dense network of trails where they cannot find peace and quiet and that no longer supports the wildlife that once inhabited the area?

**Mountain bike races are inappropriate:** I’m also sorry to read about the potential inclusion of mountain bike races in the DLH area. The trails already feel like race tracks with the banked turns, jumps, etc. and some bikers speed along with no concern about fellow trail users. Holding official races will only encourage this kind of riding and will make the trails even more unsafe.

**Please improve the Environmental Study Area:** I am happy to hear the plan includes improved interpretation in the Environmental Study Area.

**Funding should be transparent:** I’m curious about the funding for this proposal. The USFS should be entirely transparent about who is providing funds for this.

**Protect archaeological resources:** From the Forest Plan: “Mount Elden is also part of the San Francisco Peaks Traditional Cultural Property because of its traditional significance to the Hopi. This area is unique in having the highest number of archaeological sites within the entire ponderosa pine zone of the Coconino NF.” Has the USFS consulted with the Hopi about this plan? How will you assure that proposed actions do not impact archaeological sites?

**EIS is needed:** Finally, because the DLH are a small, unique spot within the Northern Arizona landscape and the PA describes development that will have significant impacts, I think a full EIS is warranted.

## Comments on specific proposed actions:

**Sandy Seep Loops:** As mentioned above, I am very sorry to see the addition of 9 miles of trail to this currently quiet area. I wonder why quiet areas are not valued. Even though I'm a hiker, I don't think we need to construct a new trail to the top of Elden in that untouched area when we already have the Heart, the Little Bear, and the Elden Lookout Trails that go to the top.

**Directional Mountain Biking:** This is not appropriate for the MEDL area. If there is a market for challenging mt. biking, perhaps a course should be built at Ft. Tuthill or the Snowbowl or some other more appropriate place, preferably by a private enterprise and on private land. Our public lands are not the place for this! This will only encourage faster riding in the MEDL area and the USFS should not be encouraging this. Additionally, these downhill trails are not sustainable.

**Devil's Chair Trail:** I like this one better than the proposed hiking trail in the Sandy Seep area, but I still don't know why we need more trails to the top of Elden. How would this fracture wildlife habitat?

**Schutz Creek Loops:** (I think this should be Figure 2, not 3.) Again – too many trails! There is already a dense trail system just to the west in the Chimney area and I wonder how those trails will be supplemented by FTI. It would be preferable to leave some of the landscape unmarred by human activity, especially to preserve wildlife habitat (see below). I do not think these trails should be built in this part of the DLH and they especially should not intersect the Lost Burrito.

**Lost Burrito:** I appreciate the idea to make this into a system hiker trail, but it will be impossible to keep bikes off of it. The map shows new proposed multi-use trails intersecting the Lost Burrito and clearly bikes will go downhill (way too fast) on the Lost Burrito when they encounter some of these intersections. Additionally, I am very concerned about the number of trails in this area. The bear I referenced above was seen just off this trail so I am very concerned about the Schultz Creek Loops fragmenting the landscape in the vicinity of the Lost Burrito. Additionally, although the map shows the Lost Burrito rerouted to the east of its present location, I fear there will be a much larger number of people going up to the southwestern dry lake (off trail), which would negatively affect wildlife. I think the Lost Burrito should be left as is.

**Ginger Trail:** It is not up to the USFS to provide challenging bike trails. This is everyone's public land (what happened to the "multi-use" idea?) and a private enterprise would be more appropriate for constructing bike courses. Again, this is adopting an illegal trail and sending the wrong message.

**Jedi Trail adoption:** Once more, this is sending the message that if a trail is built illegally, it will eventually be adopted. We already have a trail just to the east of Jedi (Little Gnarly) that makes this same connection. Not needed!

**Red Onion:** Adoption of another illegal trail. Why is this needed? One can take the Upper Oldham to make the same connections that this trail makes. This one looks particularly unsustainable as it goes straight down a drainage.

**Climb 3 and Logging Roads:** Although I really like Climb 3, I think it should not be adopted because the mostly parallel Sunset and Brookbank trails make the same connections. I would rather see Climb 3 and the roads be taken out to preserve some open space for wildlife.

**Brookbank Trail:** The Brookbank Trail is used by hikers to get to Brookbank Tank. The proposed alignment doesn't go anywhere near the tank and I believe uses at least a portion of an illegally-built trail. What are the wildlife concerns in Brookbank Canyon that are stated in the Scoping Proposed Action? This is a very popular trail with hikers and the reasons for the proposed changes should be more clearly stated. The Brookbank trail is actually an old road that has been there for many decades which indicates it was sustainably built. If the Brookbank really needs to be realigned, I'm wondering why it couldn't stay in the same general vicinity, avoid the wildlife concerns, and tie into the other portion of the Brookbank that already skirts the private land.

**Closure and restoration of illegal trails:** I am happy to see that at least 4 illegal trails will be closed, but this is way fewer than should be closed for all the reasons stated above.

**Relocate Little Elden Trailhead:** Perhaps there is a reason to create a new TH, but please do not decommission the old TH at the base of the Little Bear. It's already there so why not leave it there? Requiring the use of a new TH would add about 2 miles round trip for hikers. This proposed relocation is no big deal to bikers, but not good for hikers.

**Relocate the Schultz Creek TH:** Is it really necessary to relocate this TH? There will be a big TH just down the road at the Y that can be used in the winter and I can't imagine there is a big road maintenance problem with the current TH. Seems like some funds could be saved by leaving this TH as is. It has functioned well in all the years (decades) I have been using it.

**Sandy Seep TH Expansion:** As mentioned above, I think we should be giving LESS attention to this area rather than more. This is a beautiful, quiet spot and it should be valued for that. As soon as 9 miles of new trail are added, this will attract more people and the 9 miles will not be enough, which will foster more illegal trail building. Then those illegal trails will be adopted and this once quiet place will become the same madhouse as the DLH. This progression is what has happened (and is still happening as evidenced by this proposal) in the DLH area. There is no reason to believe the Sandy Seep area will be any different and it is a very sad prospect. Please leave this area as it is! It is the only "close in" place we can go for some quiet!

In summary, please scale back this PA substantially. The MEDL area is far from the only area for recreation in the Flagstaff region (see new FTI trails). I would support improving the sustainability of existing trails and removing illegally-built trails in the MEDL area, but not such intense development.

Sincerely,

Jen Blue