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Matthew McGrath, District Ranger
Flagstaff Ranger District, Coconino National Forest
5075 N. Highway 89
Flagstaff, AZ 86004
Submitted electronically

Dear Mr. McGrath-

Thank you for opportunity to comment on the Mount Elden / Dry Lake Hills Recreation Planning Project Scoping Proposed Action (MEDL PA)! This is the most important non-motorized recreation planning project for Flagstaff ever and we are excited to be a part of it. This effort will require community support not only to implement, but for the final decision and product in order for it to be successful. We hope that the Flagstaff Ranger District sees this as an opportunity to do something that is fun! We recognize that this is hard work, but embrace the outcome as something that the community of Flagstaff, the people of the United States and the citizens of the world will enjoy for generations.

Background

Flagstaff Biking Organization (FBO) is a group of cyclists who came together to “promote bicycling as a safe and attractive means of transportation and recreation in Northern Arizona.” Our initial project was to put on a Bike to Work Week for our community in May 2002. Building on the success we started to expand our efforts to keep people informed of cycling related issues and galvanize support for better and safer facilities, trails, and trail access. We have a successful and ongoing 18+ year relationship with the Coconino National Forest, Coconino County and the City of Flagstaff, including a Memorandum of Understanding to work cooperatively to provide for non-motorized trails opportunities in the Flagstaff area. We were also core team members and co-signers to the Flagstaff Trails Initiative Regional Trails Strategy. Please see <http://www.flagstaffbiking.org> for more information on our organization. Most of our members recreate in the Mount Elden Dry Lakes area. Our supporters will be directly affected by the results of the analysis and its subsequent decision. Please consider our comments as generally representative of our substantial supporter base’s interests.

Please note that our comment letter follows the structure of the Proposed Action as written, with additional input at the end.

Previous planning efforts

We are pleased to see that our recommendations in our response to the original 2013 Proposed Action have informed the new Proposed Action and please accept the comments made below on the new proposed action as constructive with the intent to improve upon the current proposed action.

We participated in the MEDL collaborative group that is referenced in the MEDL scoping letter has having informed the process. We would like it acknowledged that as a stakeholder in this trail planning effort, we strongly disagree with this statement: *“The working group’s recommendations balanced protecting wildlife habitat, environmental resources, and sensitive places while providing broad opportunities for diverse recreational experiences for the community and beyond.”* Although there is substantial useful input to be taken from this effort, by no means did this working group actually achieve balance or actually provide broad opportunities for diverse recreational experiences. Its failure to do each of these things should weight its input appropriately as informing any decision, but not necessarily directing it. Please treat the MEDL Working Group’s effort as one part of an extensive body of input throughout the analysis and decision-making process.

Purpose and Need

- We are generally supportive of the direction Purpose and Need statement, but feel it falls short in its lack of specificity that would better support the Proposed Action.
- We want to be clear that we strongly support the Need to mitigate impacts to wildlife, cultural and historic sites, landscapes and watersheds, and the numerous other resources in the MEDL Area. A robust trail system that proactively provides for the recreational Needs of all users is the best tool to focus use and mitigate impacts from unauthorized trails.
- The Purpose and Need Statement seems to be wholly derived from the CNF Forest Plan. Additional detail can be derived from the substantial amount of input provided in response to the 2013 Proposed Action and the substantial, albeit general, public input derived from the Flagstaff Trails Initiative planning process. This detail could benefit the development of alternatives for this re-initiated planning effort. The Purpose and Need Statement should cite several more specific Needs, at least as supporting the stated general Needs. Specifically:
 - Need: Provide a non-motorized alternative for trail users to climb and descend to and from the top of Mt. Elden removed from Elden Lookout Road between the top of Mount Elden and Buffalo Park and/or Schultz Creek Trail Head.
 - Need: Provide desirable alternatives to Schultz Creek Trail to travel between Sunset Trailhead and Schultz Creek Trailhead, or that provide a similar recreation experience nearby, to alleviate crowding on Schultz Creek Trail.
 - Need: Provide short loop-stacked loop trail systems to focus use and minimize impacts in the wildland-urban interface.
 - Explicitly recognize the Need to address the qualities of unmet demand:

- Bike specific trails and features
 - Shuttle-able bike trails
 - Although we will discuss our concerns on this issue later in this document, the Proposed Actions fails to state a need for hiking-only and equestrian focused routes.
- Similarly, the Purpose and Need should recognize National level direction that supports this recreation planning, since the Need for this project is rooted in the Agency's core missions. Specifically:
 - Cite the US Forest Service's direction to *"Help(ing) States and communities to wisely use the forests to promote rural **economic development** and a quality rural environment,"* as support for the Needs *"Address poorly designed trails or unauthorized trails, and provide for a well-planned and sustainable trail system"* and *"Provide for sustainable special use events in the area"*. If this plan is well designed and implemented, the recreation economy and the ecosystem of the MEDL Area with both benefit greatly. It is important to acknowledge this Need in support of the effort.
 - The need to create a **socially sustainable trail system** is not stated. Without a trail system that people **want to use** and help to build, fund and maintain, this entire effort will be for naught.
 - Some of these Needs could actually be addressed with additions or changes to the stated "Proposed Actions", but recognizing them as "Needs" would better defend the actions. Similarly, some of these needs may be reiterations of the Forest Plan, or otherwise implied through supporting administrative guidance. This does not preclude the efficacy of restating these Needs for the sake of public understanding.

(Note that red text in parentheses below denotes map reference.)

Proposed Action and Objectives

New Trail Construction

- The Best Management Practices (BMPs) listed Forest Service Handbook "as well as design features to protect Forest resources" are cited as the guiding parameters for implementation of this project. The Flagstaff Trails Initiative's Regional Trail Strategy, to which the Coconino National Forest is a co-signer, cites numerous sources with an array of BMPs that would augment the FSH's BMPs for a better result. (Please see page 38 here for details and a list of linked resources: <https://bit.ly/3hfwKkv>. We have also linked these all below.) Please utilize the latitude provided by these various resources derived from the extensive efforts and partnership of the Flagstaff Trails Initiative Regional Trail Strategy.
- Equestrian Trail System
 - We support these trails.

- Existing southern section of Deer Hill Trail needs substantial realignment to improve sustainability and user experience.
 - Please maintain these routes as open to bikes as many people access the rest of the MEDL and Fort Valley Trail Systems from Timberline, Fernwood and Doney Park neighborhoods.
 - Some key through-routes should recognize cycling as a Managed Use.
- Elden Base Urban Trail
 - We strongly support this Urban Trail style route not only as a highly accessible high-value recreational opportunity, but for its value as a commuting route for cyclists to cross Flagstaff away from motor vehicle traffic.
 - The trail from Buffalo Park to the Elden Base Urban Trail is shown as an “All Uses” trail that, otherwise in the Proposed Action, seems to imply a Class 3 trail. This should be a Class 4/urban style trail since it connects the FUTS in Buffalo Park to the Elden Base Urban Trail.
 - (G) We see a lack of effort focused on managing many of the other trails in this area. Although this task may seem daunting, an earnest effort to properly adopt, add and obliterate trails in this area, accompanied by substantial map-based signage would mitigate the proliferation of user created routes and the consequent resource impacts. A logical trail network with enhanced connectivity in this area would add recreational value and a sense of deliberate management at a key gateway to the Forest that would help set the tone for those headed further out onto the trail system. We understand the approach mentioned in your virtual meeting, that implementation of the FUTS style route will affect recreation patterns, but this does not preclude having the analysis done to implement a trail system after this route and its subsequent change in use patterns has been established, similarly to the rest of the Proposed Action’s approach. Please develop a strong management plan for this area, and all other wildland-urban interfaces.
- Highway 89 Urban Trail
 - We were ecstatic to see this recommendation incorporated from our 2013 comments!
 - This trail is a vital route with an eye towards long-term non-motorized transportation and recreation infrastructure allowing enhanced connectivity between the east and west sides of the city of Flagstaff.
 - Please let us know when we can provide a letter of support to the City of Flagstaff to obtain the appropriate easement to connect this trail to the FUTS, if necessary.
- Sandy Seep Loops
 - We are generally strongly supportive of the addition of loop opportunities and connectors in this area.
 - Please see comments below regarding hiking only trails.
- Directional Mountain Biking
 - We are extremely pleased that the Proposed Action is attempting to provide challenging routes designed for directional mountain biking. Our comments

here recognize, as seemingly also does the Proposed Action, that these are discrete routes separate from Ginger and other potential bike optimized routes in the document.

- Although we recognize the necessity of legally required concessions made to Mexican Spotted Owl habitat and the Endangered Species Act, we are concerned that, as proposed, several of the trails are possibly untenable within the area proposed. We have walked the alignments, and the hillsides nearby, and we have not found a suitable concept to replace trails like Private Reserve.
- It is extremely important that an alternative is found to meet this Need. (For Private Reserve in particular.)
- Frankly we have no ready solution to offer. Finding solutions will require some substantial collaboration, brainstorming and scouting on the ground. We would appreciate the opportunity to do our best to help.
- Devil's Chair Trail
 - Please see our comments below regarding hiking-only trails.
- Schultz Creek Loops
 - We love this idea! The potential to provide an array of high-quality trails for short to medium rides, runs and hikes is huge. We also appreciate this proposal's potential to disperse use from the congested Schultz Creek Trail. Having a tie-in to this system from the "uphill" side of Schultz Creek Trail will help address over-use and conflict.
 - (A) Adding several bike-optimized descent routes that are accessible from a relatively easy climb could alleviate some need for this that has been expressed by the creation of unauthorized routes throughout Flagstaff in places like Thorpe Park/Observatory Mesa, but also within the MEDL area. In particular, we see an opportunity to provide a "bike park" type experience for riders, but in an unobtrusive fashion that does not infringe on the natural setting of the MEDL area. This could alleviate some of the shuttling pressure from Schultz Pass Road and Schultz Creek Trail. This suggestion also helps to address some significant shortcomings in the Proposed Action that have arisen in response to closures that will result from addressing wildlife habitat.
- Dry Lake Ridge Trail
 - We recently ground-truthed this alignment and it has some potentially insurmountable issues even within a generous interpretation of its location. (I) An alternative may exist to connect from the top of the new Lower Brookbank and Ginger on a gentle contour around the ridge to the southwest and tying into the new Schultz Loops. This alignment manages to stay below the substantial rock outcroppings that ring the steep upper slopes of Dry Lake Hills.
- Lost Burrito Adoption
 - Please see our comments below regarding hiking-only trails.
 - Consider also adopting "Slippery But Fun/Stilley Hiking Trail" in this area as well as this provides for a loop hiking option to the western dry lake from Schultz Creek Trail.

corridor and straight alignments, it also is susceptible to being repurposed as roads during fuels reduction and fire fighting efforts.

- Upon implementation, consider carefully how to best address the expressed need here to align one or two well thought out routes that address that need.
- Please see comments regarding the need to establish a legally defensible approach for establishing exact alignments later that might deviate from the schematic approach in the Proposed Action and EA/Decision.

Trail Relocation and Improvement

- Brookbank Trail
 - We strongly support this proposal!
 - Brookbank should be built as a Class 3 trail to address the need for both uphill and downhill use on this side of Dry Lake Hills.
 - If the Dry Lake Ridge Trail concept is untenable, then a well-designed Little Gnarly-Lower Brookbank, combined with a realigned/redesigned Rocky Ridge option would potentially suffice as an alternative to Schultz Creek Trail. Please note that this would mean significant improvements to the alignment and reconstruction of Rocky Ridge Trail as well.
- Upper Oldham Trail
 - We strongly support the realignment of this little-used system trail.
 - Because of wildlife concerns, the original intent to align this trail entirely on the downhill side of Elden Lookout Road has been compromised. We suggest that this trail may be better routed from the new Lower Brookbank alignment and climb the canyon to at least Red Onion Trail, and be entirely located on the uphill side of above Elden Lookout Road.
 - It is paramount that this address the Need to provide a non-motorized alternative for trail users to climb and descend, removed from Elden Lookout (motorized) Road, between the top of Mount Elden and Buffalo Park and/or Schultz Creek Trail Head.
 - Lower Oldham should similarly have a significant realignment to bring it to a Class 3 standard and help get folks up and down the mountain without needing to resort to Elden Lookout Road.
 - We are a little confused about “new Oldham Basin Trail” as we can’t find it on the maps? Is this the short connector between Brookbank and Upper Oldham?
- Sunset Trail
 - This realignment falls short of the necessary work that Sunset needs, but perhaps the rest falls in the “General Trail System” realignments listed later in the proposed action? Sunset should be realigned from Little Bear to the (current) intersection with Climb 3. Additionally, this trail would benefit from proper realignments below that (towards Schultz Tank) since we were unable to achieve a sustainable trail alignment within the existing corridor with previous volunteer trail work attempts.
 - (H) We propose an alternate line to Hobbit Forest to the east on a lesser grade to provide a climbable option and to better suit equestrians. This would connect

near the Little Bear intersection to the top of the Hobbit Forest section probably with several turns since there is a rock barrier to the east on this slope. We propose that Hobbit Forest be managed as a bike optimized alternate line.

- The lower section of the Catwalk where it is located on the ridgeline needs a more contoured reroute to enhance sustainability.
- Elden Lookout Trail
 - This is a long-overdue improvement for one of the existing hiker-only trails. We support this.
- General Trail Signage
 - This is a much-needed improvement
 - We recently purchased the first of hopefully several signs clarifying the Share the Trails message and trail user safety considerations. Signs like these should be placed at key entry points to the system to hopefully help set a tone for better trail user interactions.
 - Signage, but interpretive and directional, should be abundant in the Mount Elden Environmental Study Area and nearby trail system.
- General Trail System
 - The analysis and decision surrounding this general approach needs to be legally supported so that these changes can be made where appropriate without roadblocks. The existing system has an endless need for realignments and improvements to sustainability and safety, and it will be nearly impossible to enumerate and address these throughout the EA process. As one of the key stakeholders who will be participating in implementing these changes on the ground, it will be important to have this latitude for the years to come.

Closure and Restoration of Unauthorized Trails

- We are generally supportive of this action, **HOWEVER-**
- Unauthorized routes should only be closed once suitable replacements addressing the need exhibited by those routes is established. It is difficult enough to enlist volunteers and financial support for trails projects. A heavy-handed approach to obliteration without replacement will potentially exacerbate, rather than improve, the unauthorized route issue.

Trailhead improvements

- We support all of the proposed trailhead improvements
- Efforts to predict changes in popularity of specific trail heads should be made since the trail systems they serve will be changing. Similarly, since population and visitation growth are inevitable, these trailheads should be suitably large enough to address that growth in demand.
- More toilets.

Special-use trail events

- We recommend an approach that puts sensitive routes off limits while leaving all other options open, rather than one that enumerates acceptable routes. Part of an event's

appeal and success relies upon the creativity of the event planner in route development. As much leeway as possible should be afforded to permittees to develop interesting routes, and for events that occur annually to potentially offer variations over the years.

Mount Elden Environmental Study Area Improvements

- We recognize the Need for this from the CNF Plan.
- As we stated above, the entire front side of Mount Elden should have a comprehensive trail plan, in which these improvements would be included. In the existing condition, there is no real delimiter between the Environmental Study Area and the surrounding system/non-system trails. This is yet one more reason why doing a better job of managing the surrounding system should be part of the EA and Decision.

Proposed Design Features

- As is expected and necessary, this section is much chapter-and-verse from the FSHB BMPs and the Forest Plan, however, per the Flagstaff Trails Initiative Regional Trail Strategy, the Coconino National Forest is afforded options for implementation of alternate BMPs that can help improve the appeal and social sustainability of the trails system. Here is the linked list of suitable resources from that document: *(We realize that some of these will have less useful direction, for example the NOVCC publication. This is the complete list from the Regional Trail Strategy.)*
- [US Forest Service Trail Construction and Maintenance Notebook](#)
- [US Forest Service Standard Trail Plans and Specifications](#)
- [US Forest Service National Trails Strategy](#)
- [Bureau of Land Management Guidelines for a Quality Trail Experience](#)
- [National Off-Highway Vehicle Coordination Council Great Trails Guidebook](#)
- [Equestrian Design Guidebook for Trails, Trailheads and Campgrounds](#)
- [International Mountain Bicycling Association's Trail Solutions Guide to Building Sweet Singletrack](#)
- [Planning Trails With Wildlife in Mind](#)
- [American Trails](#)

Supplemental/Alternative Proposals and Elaboration on Issues

This PA builds on efforts made to provide alternatives that addressed ours and other commenter's inputs on the 2013 PA while accommodating wildlife concerns.

The problem that we are finding as we actually make efforts to ground-truth several key alignments/concepts of these new proposals is that several of the key alternatives to our 2013 comments may be entirely unimplementable within any reasonable budget or timeframe. They are abstract lines drawn on a map, with no bearing on the geology and geography of the landscape, and

they end there. As we mention, we understand the “landscape level” proposed approach to the analysis, but we are left with several questions and concerns, and the inability to comment precisely on the Proposed Action, as a result of this approach.

Within this same context we need to draw attention to a substantial shortcoming of the MEDL Working Group. Although there were trail experts at the table, no effort was spent to actually get out on the ground and design and ground truth trail recommendations. Many of the outcomes from the Working Group were arbitrary and based in rehashing issues that had been addressed through the substantial input and review of the Coconino National Forest Land and Resource Management Plan finalized and signed in 2018. **Unfortunately, the Working Group failed to produce real trail solutions in many instances for this trails proposal. It is disheartening that, to a great extent, a recommendation for an actual pragmatic trail system seemed to be an afterthought throughout the whole Working Group process.**

To find creative solutions that provide the necessary trail alignments or concepts and trail features, while still addressing resource concerns, it is vital that the Flagstaff Ranger District work with us and others, who are actually experts in sustainable trails design and among the most intimately familiar with the landscape of the MEDL area, throughout the analysis for the Environmental Assessment to find creative solutions that provide the necessary trail alignments or concepts and trail features while addressing the resource concerns at hand. As we elaborated above, much of the Proposed Action addresses the stated Purpose and Need well. However, as is also enumerated above, there are several trail concepts that may not work at all, thus leaving Needs unmet.

Elaboration on Potential Pitfalls with “Landscape Level” approach to analysis for trails

We understand the “landscape level” approach to showing conceptual routes in the Environmental Assessment and Decision, to be sorted specifically upon actual alignment and construction. We also understand that the District has had success with a similar approach for the Four Forest Restoration Initiative’s fuels reduction projects. Because fuels projects are, by their very nature, polygonal, and trails are, by their very nature, linear, we have concerns that unless this approach is thoroughly documented and supported in the final decision, eventual attempts to properly align and construct the actual trails may be thwarted by different leadership and specialists on the District. Please work with your NEPA experts and other specialists to assure that the final EA and Decision provide the legal standing for this approach.

We also have concerns about what “boundaries” the trail concepts in the Proposed Action have since they are not defined. We are proposing additional alignments below, some of which provide conceptual alternatives to those in the Proposed Action in order to help flesh out the opportunities to address the Needs as defined in the Proposed Action and as recommended by our comment letter.

Understanding “Bike Optimized” Trails and varying mountain biking experiences

As mountain biking has evolved, the types of trails that cyclists seek out have grown in diversity. Although some riders still prefer steep, challenging terrain, and we strongly support that this is a Need that should be met, there is also a large demand for trails that incorporate “flow” features, and a more

intermediate level of challenge. These sorts of feature would include, but are not limited to, in-sloped corners, rock-rolls and grade reversals that add opportunities to jump a bike. All of these can be done in a highly sustainable fashion, and in such a way as to be discrete and barely discernable to a non-mountain biker, thus preserving view-shed integrity.

As we mention throughout our comment letter, some of this Need can be partially met on a multi-use Class 3 trail if side features are purposely built to accompany the main alignment.

We suggest that the District consider incorporating some trails that are designed to specifically meet both these Needs. That would include Jedi and our proposed flow trail from the lower summit of Sunset to (roughly) the middle of Little Bear, and the short bike optimized trails in the Schultz Loops system, as well as a yet to be determined replacement for Private Reserve. These proposed trails are discussed below.

Concerns with Hiking Only routes in the Proposed Action

Although we understand the desire to have trails for hiking only, separated from other uses, we have concerns with singling this use out for special consideration.

This exclusive Need is not stated in the Purpose and Need, and we disagree that there is a need to exclude all other uses from even more trails. Numerous other opportunities already exist nearby for trails designated for only this one use. The Kachina Peaks Wilderness is set aside for only hiking. Similarly, Elden Lookout Trail is recommended and signed for hiking only.

We want to be clear that we do support trails designed for hiking, even to the extent that would make them especially unappealing for mountain bikers. We are opposed to additional legal prohibitions on where bikes are permitted.

Although we have many friends in the hiking community, and many folks who identify primarily as “hikers” attend our sponsored volunteer events, the hiking community has failed to substantially participate in providing trail opportunities through **funding**. The trail proposed in the Sandy Seep Loops, Devils Chair and realignment of Lost Burrito in the MEDL Proposed Action, will be some of the most expensive trails to build, and not readily accessible for volunteer events. We are concerned that the Flagstaff Ranger District’s internal efforts and grant-seeking may be unduly channeled to provide these trails since no one else will, rather than being focused on the rest of the trails that will help to address the needs of all trail users in the Mount Elden Dry Lakes Area.

We are also concerned that the District’s perception of need for this use may be skewed by the daily reminder of the over-capacity Elden LO Trailhead that is visible from the FRD back door. Many trail heads are similarly full, (Schultz “Y” and Schultz Creek, Buffalo Park, Schultz Tank and Sunset Trailhead.) Additionally, mountain bikers are often apt to ride from their home whereas hikers are almost always apt to drive to begin a hike at a trail head. Need should be determined by actual data and not anecdotal observation.

Please analyze the cost and benefit of this exclusive use versus multi-use trails in the EA since resources to construct trails are often in short supply. Additionally, if the District should choose to move forward with exclusive designations, please use “Not Recommended” language and signage to discourage use by equestrians and cyclists rather than implementing legal closures.

List of additional proposed trail concepts and approaches

We have some general approaches and some specific concepts that could address these unmet Needs in creative ways. Some of this may be reiteration from comments to specific actions listed above. These and other concepts within our comments may be treated as alternatives or additions to the Proposed Action as is appropriate. We look forward to the opportunity to help to find the best solutions with the District.

- Short directional bike optimized trails as part of Schultz Creek Loops (A)
 - This is a great opportunity in a perfect location
 - Several trails with varying degrees of difficulty and design would provide a “front country” opportunity that would be extremely popular with relatively low impact
 - This may be part of a strategy to address the loss of Private Reserve and the management challenges that presents.
- Numerous discrete challenge/fun features adjacent to multi-use trails throughout the system
 - This is a key component to addressing a substantial unmet Need as expressed by the existing numerous, sometimes poorly made, existing examples.
 - Proactively encouraging this as part of many trails’ designs will mitigate potential impacts from these features being created haphazardly, and go a long way towards creating a high level of user satisfaction.
- Several alternate alignments within proposed and existing trail corridors that provide challenging alternatives incorporated into multi-use trails.
 - Examples of this would be providing a more contoured alternative on Sunset to the Hobbit Forest in order to make the current alignment more bike-specific, or potentially adopting sections of the Pickle Trail, (with improvements), as challenging alternatives to the new Lower Brookbank alignment.
 - This may be part of a strategy to help address the loss of Private Reserve and the management challenges that presents.
- Move Upper Oldham to the uphill side of Elden Lookout Road (B)
 - We are not sure if this alignment will work, but this could help alleviate some wildlife concerns while additionally moving the trail further up-slope from post-fire flood impacts.
 - Could potentially tie into the below-mentioned traverse from Brookbank to Little Bear.
- New directional flow/challenge trail from lower summit on Sunset to new connector from Little Bear to Sunset Trailhead area. (C)
 - This route would draw riders from descending the very popular lower section of Sunset thus mitigating potential for user conflict and providing a better experience for hikers and equestrians.
 - This may be part of a strategy to help address the loss of Private Reserve and the management challenges that presents.

- The trail from the most northern switchback on Little Bear and the Sunset TH area is a short connector that would provide several new loop options and access to Sunset TH from Little Bear without “re-climbing”.
 - Upper Dry Lake Hills Loops (D)
 - Although a contingent in the MEDL Working Group expressed a concern about wildlife impacts in the vicinity of the two wetlands in the Dry Lake Hills, to the best of our understanding, there are none worthy of substantial consideration. This concept would actually remove the only travel way near the western dry lake and provide a higher quality trail as a replacement.
 - We propose two interconnected loops to provide opportunities for exploration of the views and landscape around the western dry lake, to re-direct users off the existing road bed that infringes on the western dry lake itself, and to provide connectivity for long loops for hiking from Lost Burrito, (and potentially Slippery But Fun/Stilley Hiking Trail), and a longer ride opportunity between Schultz Pass or Upper Brookbank areas and Schultz Cree TH area.
 - Mount Elden Scenic Loop Trail, from 2013 Proposed Action (E)
 - We were disappointed to see that this trail had been removed from this iteration of the MEDL Proposed Action
 - People are traveling to the top of Elden Look Out Road to enjoy the views, hike the upper sections of Sunset and Elden Look Out Trails and explore this higher elevation area. This loop would provide access to some of the best views while redirecting use and mitigating impacts of dispersed hiking.
 - This concept could be incorporated with some of the proposed hiking routes to provide additional loop options.
 - A well-built Class 3 trail could be a great exploration option for all trail users willing to venture up the mountain.
 - South side traverse from the middle of Brookbank to Little Bear Trail (F)
 - This trail provides various loop options that reduce the necessary climbing/descending to travel between Sunset and Little Bear Trails to descend/climb Lower Brookbank or the new Dry Lake Ridge Trail towards Schultz Creek TH.
 - Could double as part of an alternative to using Elden Lookout Road.
 - Rocky Ridge and Lower Oldham Trails realignment
 - Although we understand that this falls under the general heading of “General Trail System” realignments, these trails should receive special attention because they have great potential to disperse use from Schultz Creek Trail as alternative arterial trails for those that venture further out into the trail network.

We ask that the District provide an array of Alternatives in the Environmental Assessment that incorporate our input and the input of other mountain bikers and trail users and an analysis of the viability of these proposals. Ideally we would like to see, and feel it best addresses the Purpose and Need for this Action, that the bulk of our recommendations or similar concepts that address these expressed Needs, are part of the District’s Preferred Alternative.

In summary we want to reiterate that, due to the conceptual nature of the Proposed Action, we are only

able to comment with similarly abstract concepts on certain points. We hope that this is indicative of an iterative process in which the District intends to engage us and others as the Environmental Assessment and Alternatives are developed, and then again throughout the implementation process. We welcome this involvement and are excited to participate in the creative process of developing trails for not only mountain bikers, but all trail users!

Thank you again for this opportunity-

Sincerely,

On behalf of the Board of Flagstaff Biking Organization

Anthony Quintile and Joe Hazel