



Flagstaff Biking Organization
PO Box 23851
Flagstaff, AZ 86002
trails@flagstaffbiking.org

June 23, 2021

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 Environmental Assessment (MEDL EA). We are generally supportive of the plan as laid out in the EA and are pleased that the District has taken the time to review and include our input and the input of the divergent interests of the community. We feel that this plan addresses the needs of the recreating public while making strong management decisions that will protect wildlife, cultural and other resources. Congratulations to the specialists and planners that have worked on this document!

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 19+ 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 supporters 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.

Since we are generally in favor of the direction laid out in the EA, our comments will be focused on specific highlights. Please note our general support for the plan, and assume our lack of input on any item to be implied support.

Strong support for Designed Use mountain bike trails and challenge features

We strongly support the inclusion of trails designed for mountain bike use, and the statement that “Trails designed for all uses could include bypasses for additional challenge.” This guidance will help to facilitate the creation of a trail system that riders want to use, and contribute dramatically to addressing the expressed demand inherent in so many of the unauthorized routes that have arisen over the years. It is direction like this that demonstrates an holistic approach to recreation and resource management.

Specific input on the new lower “Reserves” Trails

Because these trails are key to addressing a significant need for mountain bikers, and because of their proximity to sensitive MSO habitat, we have enlisted the help of Josh Langdon, (Flagstaff Trail Faeries, American Conservation Experience trail designer/builder), to provide a recommended corridor alignment for the lower section of the “Reserves” Trails. It is our understanding that, although this corridor as shown in the EA is conceptual, it is more constrained than some other rough alignments. Please see attached JPG and GPX files for a ground-truthed corridor proposal for these alignments. It is somewhat more north and west of the corridor proposed in the EA, but this is necessary because of the geology and prevalence of rocks and features that are not as common to the south and east. Please feel free to follow up with us with any questions, and engage us for assistance for any and all designed bike use trails throughout the implementation process.

Support for eventual obliteration and enforcement

We agree with the need, and support the staged approach, for adding new trail, obliterating old trail, and immediate obliteration of newly created unauthorized routes and potential enlistment of law enforcement, in that order. Although we are strongly in favor of growing the **system** trails in the MEDL area, we also understand the need to protect wildlife, cultural and other resources. The extensive additions and improvements to the system will go a long way towards mitigating demand, and hopefully there will be very little need to follow up with new unauthorized routes once the system is developed.

Schultz Creek Trail Corridor MSO Restrictions/Limitations not discussed in the EA

There has been an ongoing discussion about the location of the Schultz MSO PAC boundary’s location at Schultz Pass Road, rather than Schultz Creek Trail, and the challenges that that presents for special use events and trail maintenance efforts.

Although we did not see any analysis or discussion of this in the EA, we did briefly discuss it with Patrick McGervey, and we understand that US Fish and Wildlife Service needs to keep the boundary at the road for the health of the MSO.

That acknowledged, we would like to see an elaboration on the management strategy for this corridor as it will affect how FBO, the Flagstaff Trail Faeries, and many others, will approach partnering with the USFS on projects in this area. Clarity on this issue will facilitate better communication.

Support for defending the EA and plan as it is written

Through our discussions with the Flagstaff Ranger District and others, and our reading of the EA, it is apparent that top-level specialists and experts in several agencies were involved in writing the document. It is thorough and concise and successfully balances resource concerns while providing for the substantial recreational needs of the recreating public.

That said, we are aware that some individuals and groups may attempt to appeal or even litigate any Decision to move this plan forward.

We encourage the District to stand its ground. Were it up to Flagstaff Biking Organization, we would have added several other routes, some of which we forwarded in our Comments to the Proposed Action. Some of the routes that we proposed that were not included have no scientific basis or resource concern cited for their exclusion. These routes were not included solely as a concession to a small group of individuals. As it stands, we are comfortable seeing this plan **finally** move forward, even with the concessions that have already been made.

If additional concessions are made to those opposed to well managed recreation, we would like an opportunity to have some additional concessions made on behalf of mountain bikers and other trail users. Our support is for this EA, as it is written.

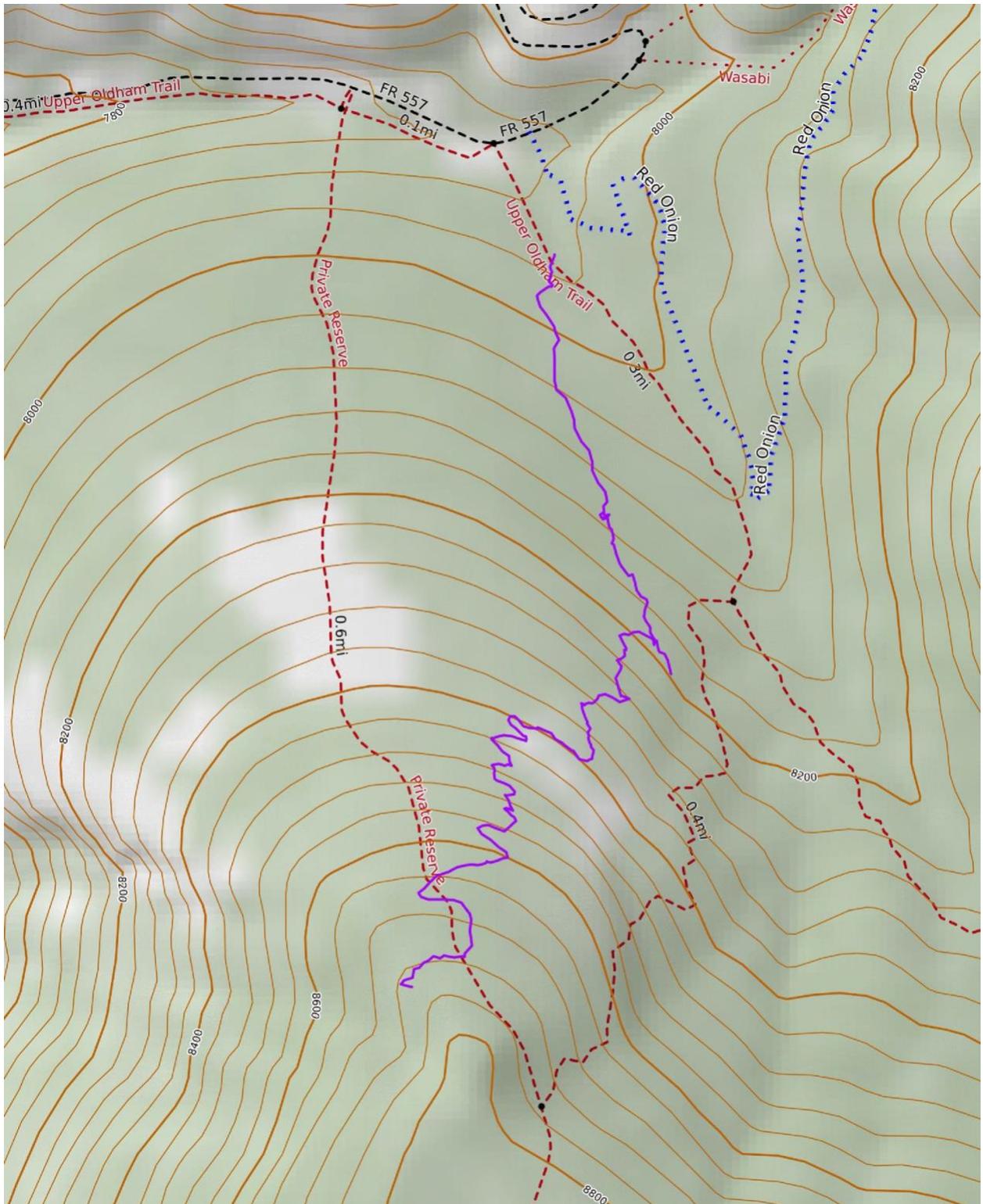
Thank you again for this opportunity

Sincerely,

On behalf of the Board of Flagstaff Biking Organization

Anthony Quintile and Joe Hazel

New Lower Reserves corridor:



Mercator Projection
 WGS84
 USNG Zone 12SVE