



**SIERRA  
CLUB**

Flagstaff N AZ Group Joe Shannon Chair - 318 W. Birch Ave. #8 Flagstaff, AZ 86001  
Phone: (928) 380-9537 Email: [jshannon278@gmail.com](mailto:jshannon278@gmail.com)

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Matt McGrath, Patrick McGervey, Christine Handler  
Flagstaff Ranger District  
Coconino National Forest

Submitted via Forest Service electronic form and

(Submitted via email to [matthew.mcgrath@usda.gov](mailto:matthew.mcgrath@usda.gov), [patrick.mcgervey@usda.gov](mailto:patrick.mcgervey@usda.gov),  
[christine.handler@usda.gov](mailto:christine.handler@usda.gov) as back-up)

Re: Submitted Comments – Mt. Elden-Dry Lakes Recreation Plan – Environmental Assessment

Dear Mr. McGrath:

On behalf of Sierra Club Grand Canyon Chapter and Flagstaff Northern Arizona Group we appreciate the opportunity to comment on the Mt. Elden / Dry Lakes Hills Recreation Planning Project Environmental Assessment (MEDL-EA). The Grand Canyon Chapter of Sierra Club has long been committed to protection of Arizona's lands, forest, wildlife, and national parks. 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." Inspired by nature, the Sierra Club's more than 3.5 million members and supporters work together to protect our communities and the planet.

We have a long history of engagement with forest and recreation issues on the Coconino National Forest. We appreciate the opportunities to interact with Forest Service staff as stakeholders and core team members during the many years' process of this project. Our members have a significant interest in this project because they hike, bike, climb, run, camp, and watch and photograph wildlife in the MEDL area, and have a deep concern about forest and wildlife health.

The Mt. Elden-Dry Lake Hills area (MEDL), along with the San Francisco Peaks, are a rare and vital sky island that is in crisis from climate change, human overuse, logging, and wildfire impacts, which are devastating the vegetation, wildlife, and landscape resources. Forest management intervention to protect these resources is critical for their survival. The remaining undisturbed/undeveloped areas throughout the entirety of MEDL must be managed for wildlife and natural resource preservation, especially at higher elevation, i.e. anything above 7,500 feet, as well as cultural resource protection.

We know MEDL trails are being compared to other western mountain "premiere" trail systems. However, relative to other mountain regions in the west, MEDL is tiny and simply lacks the land area to accommodate all the demands for specialty trails, more trails, more people, etc. For example, the entire area of MEDL plus the S.F. Peaks is at least 70 times smaller than one section of Colorado's Front Range mountains just outside Denver <sup>[7, 10, 11, 12]</sup>. Another important point is that MEDL receives less than half (or even less) of the precipitation that occurs in other western mountains, such as nearby Colorado. This lack of moisture results in much higher recreation damage impacts and much less ability to recover ecologically. MEDL area's few mountains/hills cannot compete with the resources of other mountain trail areas nor should we expect this of

it. Instead of the CNF continually struggling to meet increasing demands, the public needs to be educated that MEDL is a rare jewel that has ecological capacity limits. Please consider this.

We thank you for all your time and significant effort on the Mt. Elden / Dry Lakes Recreation Planning Project Environmental Assessment (MEDL-EA). We have noted and sincerely appreciate the important adjustments that were made to the MEDL Proposed Action.

### **Implementation Plan** (Appendix B pgs 81-84)

We commend the components of the Implementation Plan. We asked for transparency for the planning, funding, and trail implementation, as well as the direct Forest Service oversight that you have promised. We support the plans for unauthorized trail prevention and closures, as well as, rapid response to remove and investigate any new illegal trails. Other existing illegally constructed bike trails that were not included on the Proposed Action map should also be closed and obliterated. We agree trail removal should occur in a systematic method and in increments, e.g. for every three miles of new or rerouted trail, the same amount of mileage of unauthorized trails are obliterated and restored. The same Trail Crew(s) that construct trails should also participate in obliteration and restoration of trails. This way the trail crews are all working for the same forest goals.

Obtaining outside grants or internal government funding is an excellent objective. Best management practices and Forest Service Specialists to protect natural and cultural resources is a good foundation for trail plans. Thank you for the plans for public engagement and trail education, names, stewardship, and monitoring. Regarding Trail Etiquette, we suggest adding these to the Trail Etiquette signage: *“Be considerate to any and all uphill travelers”*, *“Faster speed ≠ right-of-way.”*

### **Illegal construction of bike trails and solutions**

The ongoing problem of illegally constructed bike trails has been a large part of the MEDL plan conversation. We are referring specifically to illegal bike trails deliberately constructed with tools, which has been acknowledged by the Coconino National Forest (CNF) and by every stakeholder as a widespread problem throughout MEDL. Once again, we submit the comment that CNF is on a slippery slope by enlisting volunteer trail work from the same group that demands bike-specific downhill trails that exactly match the illegally constructed bike trails throughout MEDL. This collaboration places the CNF into a compromised position. Surely, the CNF has the resources to obtain its own funding and/or recruit objective volunteers with altruistic goals that include all recreationists, as well as resource preservation.

In order to address the widespread problem of illegal bike trail construction and maintenance, we suggest implementation of a forest regulation that already exists and has been successfully used in the Red Rock District - **“36 CFR 261.56. Possessing or using a bicycle off of National Forest System Roads or trails in the restricted areas.”**

We also ask the addition of at least two more dedicated law enforcement officers (LEO) for patrol and investigation of recreation offenders. This is a priority, considering the many years history of illegal activity, the current unprecedented numbers of forest users, and the predicted increase in recreationists. Moving forward without the key component of law enforcement is inexcusable and will result in the same trail problems the CNF has been unable to solve for years. For the last ten years the CNF has acknowledged the need for more LEOs followed by the same excuse “The process is too difficult to obtain more.” This is embarrassing, especially when there are at least 285 permanent full time employees in CNF. If you started the process ten years ago when illegal activity and trails were reported to you, then CNF could certainly have at least 10 LEOs by now and a much less damaged forest.

In our discussions with the community, we have heard a number of comments that a straightforward solution to illegal bike trails, ongoing conflicts, safety issues, and resource damage is to ban bicycles from the MEDL area. This would also solve the increasing problem of illegal eBikes on trails and associated conflicts, speed and safety issues, and resource damage.

### **74% hikers/walkers and 5.6% cyclists**

This MEDL plan appears to be bicycle-centric when the documented majority of trail users, by far, are on foot and not bicycles. Please note that your own reported EA data shows that 74% of Coconino National Forest visitor use is hiking/walking, while only 5.6% is bicycling. The Flagstaff Trails Initiative (FTI) data also show the majority of all reported trail use is hiking and finally, the City of Flagstaff's visitor study shows the number of CNF walkers/hikers is 10 times greater than cyclists.<sup>[1,3,4]</sup> How is it that a small, but very vocal user group appears to influence the USFS planning process to the disadvantage of all other forest users, not to mention the destruction of wildlife, vegetation, and other landscape resources?

The USFS has a mandate to protect and manage our public land for ALL recreationists and ALL environmental resources within. However, the USFS is NOT mandated to create a contrived outdoor thrill gymnasium for a small subset of users who are unable to see beyond their immediate gratification. Forest Service personnel and recreation specialists have relayed the message that these users will continue to damage the resource and construct illegal trails if the CNF does not give in to their insatiable and unsustainable demands. Is this a basis for credible recreation management? We have yet to see studies that show legal system trail construction inhibits illegal trail construction. Please do not allow CNF to be bullied by demands and false narratives of “unmet needs” from some in the bicycle industry. A well-managed and progressive recreation plan would uphold the USFS mission to protect our (diminishing) natural resources regardless of the latest unsustainable and “shiny object” trend.

### **Proposed vs. manageable trail mileage**

The proposed 66 additional miles of trails more than doubles the existing system trails. This amount is far too much from both a resource protection perspective and from a recreation management perspective. As noted in our previous comments and by forest management specialists - the CNF is not able to manage the existing mileage of system trails, nor has it been able to enforce forest regulations in the MEDL area. Why then, would the CNF propose to increase the trail mileage and enforcement area with no history of successful management in a much smaller trail system?

We have repeatedly asked that some areas are identified as important spaces for wildlife habitat and cultural values and set aside from trail construction. There should be several large, trail-free areas (e.g. the majority at higher elevations and each of them approximately 640 acres in size) left on the MEDL landscape and we don't see them in this plan.

### **Regarding Special Use Events (pg 5)**

- Special Events should be prohibited or severely limited in the MEDL area, as opposed to other areas of the CNF that have less recreation use and are less fragile and impacted. History has shown that special events (e.g. race events) result in over-crowding of the trails / trailheads / access roads during the events, as well as, for weeks prior to the events due to increases in visitation to scout the race trails. Several events spread over the year will result in continual over-crowding and all the associated negative impacts. If the stated objective is to disperse users and “draw recreationists away” from the already over-crowded trail areas in MEDL, then allowing any special events in the MEDL area is the opposite of this objective and is not well-managed recreation.

### **Regarding Agencies or Persons Consulted (pg 6)**

- We are disappointed that the CNF drastically increased the locations and mileage of proposed trails against the final recommendations of the MEDL Workgroup, who were invited consultants by the Forest Service and committed a year of their time to collaborate on the MEDL trail plan.

### **Regarding Snowbowl Master Development Plan MDP (pg 22)**

- It is noted that CNF accepted Snowbowl's Master Development Plan (MDP) on the San Francisco Peaks. This plan proposes substantial development which will change the character of the landscape. If approved, this plan will have a large and negative cumulative effect on the Peaks, MEDL, Ft. Valley, and the surrounding lands. Acceptance of the Snowbowl MDP increases the necessity that the Peaks, Ft. Valley, and MEDL should be analyzed in one EA or EIS. The cumulative impacts of recreation in all these areas are interrelated and will add up to negatively impact the ecology and cultural resources of the entire area, including the San Francisco Peaks Traditional Cultural Property (TCP).

### **Regarding Commercial Outfitting and Guiding**

- We OPPOSE commercial outfitting and guiding in the MEDL area.
- It is very concerning that the CNF: (A) created a commercial outfitting and guiding plan ("Recreation Special Use Management Plan"), and (B) invited business entities to submit commercial propositions without first notifying or seeking public participation or comment. This is not transparent and works against building trust with the public.
- It is very disappointing that the topic of commercial guiding was not included in the MEDL Workgroup consultations who convened for a year on the MEDL plan.
- The intent of the CNF to pursue commercial guide trips in our national forest is only briefly mentioned in the 91 pages of the MEDL EA and is nearly undetectable under unrelated sub-headings. Many readers missed this important information to comment on.
- It is disturbing that the CNF states the very small area of MEDL was allotted 65,700 user days for commercial users. This is a huge amount of people for such a small and environmentally fragile area. The MEDL EA states this commercial plan will increase the number of people using trails in the project area. These commercial plans contradict the CNF statements to "*protect natural resources*" and "*respond to ongoing negative impacts from unsustainable recreation on forest resources*".
- This area already receives an extremely high level of use - so much that the MEDL plan is necessary. There is not a need for commercial guides to teach people how or where to access the area, which already contains beginner, intermediate, and expert level trails and has multiple map types to identify trail locations and difficulty.
- CNF needs to provide much more detailed sources, citations, and information to the public on how these user day capacities were determined. How old are these metrics and models? Do they lump all national forests into one USDA category? What was the landscape basis for the capacity amounts? Was the climate crisis, logging and wildfire impacts, fragility of the area, and existing over-use of MEDL calculated into the capacities?
- CNF states 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.*" Our response is the public needs to be informed about which models were used and how they were used. Also, the public needs to meet with the CNF recreation planners who made these capacity decisions so they can provide details and answer questions.
- We note this statement in the EA regarding the MEDL Environmental Study Area (ESA): "*The Forest Plan also limits outfitter-guide and group special use activities that would adversely affect the character of the Environmental Study Area.*" Why is this criteria not used for the WHOLE of MEDL, not to mention the entire Coconino National Forest? It seems to us that adding 65,700 people, plus their guides, plus their vehicles would adversely affect the character of MEDL.

- After calculating the CNF allotted commercial user days for just a few areas near MEDL, we are astounded and concerned that you think an additional 433,839 commercial visitors (plus their guides and vehicles) is actually a reasonable number for a portion of the Peaks area.
  - Fort Valley – 147,825
  - MEDL – 65,700
  - Peaks East - 65,700
  - Hart Prairie - 65,700
  - Peaks North – 87,600
  - San Francisco Peaks – 1,314
  - TOTAL = 433,839
- We especially oppose downhill biking commercial shuttling due to myriad associated problems of:
  - o increased motorized activity in the MEDL area that has stated objectives for a non-motorized recreation plan;
  - o user safety and conflict issues from speeding vehicle shuttles with other road users such as runners and cyclists;
  - o conflicts on trails from speeding downhill bikes;
  - o encouragement of illegal downhill trail construction as a result of CNF support for vehicle shuttling.

### Regarding Potential for Wildfire (pg 30)

- Thank you for the campfire ban in the MEDL area. Please continue this permanently. However, we do question your minimizing of the amount of human-caused fires in the MEDL area: “...Only forty percent were determined to be caused by human activities, and only 4 grew over 10 acres”. You list the number of fires, but what is the actual total acreage of burned landscape caused by humans? It should be noted that (A) although campfires are banned in the MEDL area, illegal campfires still occur, and (B) An increase in MEDL visitation will result in an overall higher risk of human-caused fire whether it’s illegal campfires, cigarettes, vehicles, etc, especially with the increased aridity, a desiccated landscape, and more and more aridity-killed trees.

### PROPOSED ACTION

#### 1. New Trail Construction (pgs 9-13)

##### A) “Bypasses for additional challenge” – We **OPPOSE**.

Building multiple trail lines in the same area is not consistent with “best management practices”. Even one allowed bypass invites user construction of a multitude of additional illegal bypasses on all trails. How will the CNF possibly manage and monitor all the “allowed” bypasses amongst the illegal bypasses that will definitely be built? This is a safety issue where users may collide while merging from the bypass and the “regular” trail. Also, it seems the CNF will be liable for injuries sustained by cyclists who unknowingly attempt a “challenging bypass.” Another safety issue is that the “challenging bypass” invites excessive speeds on trails where “all uses” are supposed to occur, e.g. if a “challenged” cyclist collides with a hiker or horse. How is a trail considered “all user” when one user group gets special trail features sponsored by the Forest Service that puts everyone else in danger?

##### B) **Devil’s Chair Trail** - Thank you for ending the trail at the Devil’s Head Communication Site. The proposal of numerous bike-centric trails has forced many of us into a position of support (need) for hiker-only trails. We originally supported this trail initially because it was part of a much lower mileage trail plan and it stopped at Devil’s Head Communication Site. The unauthorized trail immediately south of Devil’s Chair should also be on the “Trail Closure/Removal” list (See Map #3).

- C) **Sandy Seep Loops, “new north side of Mt Elden hiker only trail”, Old Heart Trail adoption**
- **We OPPOSE** the two higher elevation Sandy Seep Loops/trail spurs that lead to the proposed new hiker-only trail on the “north side of Mt Elden.”
  - We support **ONLY** those “lower” Sandy Seep Loops that are in the same vicinity of the existing Sandy Seep Trail and Christmas Tree Trail providing the unauthorized trails in the vicinity are removed.
  - **We SUPPORT** incorporating portions of the original Heart Trail. As mentioned previously, we struggle to understand the ethics of the New Heart trail in light of the Freedom of Information Act (FOIA) documents we obtained that contained information the CNF approved the New Heart trail at the urging of a bicycle user group in a non-transparent Categorical Exclusion (CE) that received only seven comments. Further searches on the CNF website show the link and analysis information for the CE is unavailable to the public.
  - The MEDL Plan needs to be truthful and add the New Heart trail to the total “biking intended” mileage. The very proposal to adopt the Old Heart trail is an admission by the CNF that the New Heart trail is a bike-intended directional trail. Hikers have overwhelmingly opposed the reroute of the Heart Trail.
  - **We OPPOSE** the new “hiker-only” trail on the north side of Mt Elden’s inner basin.
    - Please do not disturb the land with yet another new trail and bring more human disturbance into Mt Elden’s diminishing and rare natural habitat. There are already **TWELVE** nearby trails as listed: **SEVEN+** trails to the north/northeast (OLD plus NEW Heart Trails, Little Elden Trail, Elden Spring Trail, proposed Equestrian Trail system, plus existing Sandy Seep trails, plus proposed Highway 89 Urban Trail) and **FIVE** trails around the ridge on the south/southeast side (Elden Lookout Trail, Fat Man’s loop, Christmas Tree trail segment, Pipeline Trail, proposed Elden Base Trail).
    - We will sacrifice the chance for a hiker-only trail in order to protect Mt Elden from further disturbance and human impacts. This is an unwise idea for the future of Mt Elden’s natural resources and wildlife.

D) **Private Reserve Directional Mountain Biking**

- **We OPPOSE** all of these trails.
- The permanent closure of Private Reserve for Mexican spotted owls (MSO) habitat preservation is commendable.
- **We OPPOSE** the concept of trading an illegal trail that should not have been built in the first place with a new trail as a concession and reward for illegal construction and destruction of forest resources. The new “Lone Eagle” trail that is proposed for the lower section of Private Reserve is narrow and on extremely erodible soils. Not only is it already causing serious erosional issues but it will cause safety issues as hikers and runners are not easily able to avoid speeding bikes due to the topography of the area and the erosional issues. It is unclear how it is far enough away from the original trail to resolve wildlife conflicts.
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- Once again – we urge no new trail construction in undisturbed areas. The proposed north facing drainages just south of “Upper Oldham” switchbacks have several good areas for MSO recruitment in the future.

E) **Sunset Ridge Directional Mountain Biking**

- **We OPPOSE**, especially because this is an undisturbed area.
- This trail proposition is disappointing, especially as our MEDL Workgroup avoided trails in undisturbed areas.

- This small area is already inundated with at least SIX other nearby trails: Sunset Trail; Two more existing unauthorized trails/old roads paralleling Sunset on both sides – See Map: <https://usfs.maps.arcgis.com/apps/webappviewer/index.html?id=ac2341638f80447db6a20dcb5a6f9f09>; Climb 3; Weenie Walk; Little Bear.
- Furthermore, these two (mentioned above) existing unauthorized trails or roadbeds that parallel Sunset are NOT listed to be removed! If CNF intends to leave them there, then improve one of existing trends as the “Sunset Directional” trail and do not disturb new landscape.
- Why isn’t lower Weenie Walk designated on your map for Trail Removal/Closure? This is what CNF said they would do in the MEDL Proposed Action (August 2020). This is also an unauthorized trail removal our MEDL Workgroup agreed on.
- This proposed undisturbed “Sunset Ridge” is habitat for wildlife trying to avoid the other nearby FIVE trail areas or trying to avoid the burned habitat.

**F) Ginger Trail Adoption, Brookbank, Rocky Ridge new construction**

- The permanent closure of illegal trail segments in the Ginger/Pickle/Prom Night areas is commendable.
- **We OPPOSE** the higher elevation trail segment just below the Western Dry Lake connecting Burrito to Ginger; this will encourage illegal downhill biking trails from Western Lake area above, as well as, from this segment to undisturbed slopes immediately below.
- **We OPPOSE** the three parallel trail segments in the Ginger drainage area; this will encourage illegal downhill bike connections between them parallel trails – They are REDUNDANT! Remove the two highest elevation segments.
- **There is a NEED TO REMOVE** the illegal trail segment between Ginger and Pickle that parallels the south side of “Eastern Dry Lake”. Leaving this segment will only encourage downhill trails from it to the new trail construction below.
- **Remove redundant “Brookbank” trail segment** at the bottom of Brookbank.

**G) Little Gnarly Bypass**

- **We OPPOSE this** – This is excessive; just use the existing roadbed to avoid another redundant trail. Hikers and cyclists use this roadbed now without any problems.

**H) Red Onion Trail Adoption**

- We support ONLY if Mt. Elden Road is closed to motorized vehicles to prevent vehicle shuttling up to Red Onion.

**I) Lost Burrito “hiking only” trail**

- Trail plans still have problem of bike trails accessing it. Move bike/all user trails away from Burrito.

**J) Schultz Creek Loops**

- Thank you for removing the higher elevation segments. These loops appear to contain high mileage, but this is more acceptable than building on undisturbed landscape.

**PROPOSED ACTION (cont’d)**

**4. TRAILHEAD IMPROVEMENTS, Double Gates & Road Closures**

**Elden Lookout Road (FR 557)**

- Thank you for creating a double gate on Elden Lookout Road (FR 557), which allows for complete closure at the first gate as necessary, and permanent closure of Elden Road above the second gate.

The recent long closure on Elden Road was a great success. We heard positive comments from hundreds of recreationists, who also request a permanent closure of Elden Road above the gate. We urge the CNF to continue the closure of Elden Road at the second gate.

- During Elden Road closure we observed many cyclists, hikers, runners, and walkers regularly enjoying and using Elden Road. This closure also prevented repeated vehicle shuttling of cyclists and associated dust and noise, safety and conflict issues, road damage, and wildlife disturbance. However, it was obvious cyclists were still able to access and enjoy Mt. Elden.
- The second gate closure on Elden Road also prevented the ongoing proliferation of illegal downhill trail construction and maintenance. Regular monitoring showed that illegal trail chain-sawing, jump and feature construction, and other illegal maintenance commenced immediately after the second gate was re-opened to vehicular access in Spring 2021. We also observed new burning in fire rings near the top of Mt. Elden and campsite trash.

### **MEDL Workgroup Recommendations**

- Note that closure of Elden Lookout Road was an important conclusion the MEDL Workgroup submitted to the CNF.
- An idea we discussed at our MEDL WG meetings was access via a transit system from Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) or other transit provider. We have presented this information to the CNF as well, and NAIPTA worked with us to produce a Transit Plan for Schultz Rd. We are happy to share this and discuss it again. A “trail bus” or open-air type of bus would travel between the recreation gates on Schultz Road on a schedule and recreationists could have further access in MEDL area. This plan would allow for access without the safety issues and persistent noise and dust from excessive motorized vehicles, 4-wheelers, etc.
- Double gates allow recreationists to get further into the backcountry and would not preclude activities such as permitted events or administrative access.
- Once again, we would like to remind you of your stated objectives for the MEDL planning project: ***“Dispersed recreation in a semi-primitive non-motorized setting and to manage for wildlife habitat”***; ***To “reduce resource impacts from increasing recreation and meet changing demands for trail use and other non-motorized dispersed recreation”***; ***“Mitigation of existing impacts to wildlife habitat, soil and water resources”***.
- Recreational plans (e.g. this MEDL plan, FTI, etc) result in increases in motorized activity <sup>[13, 14]</sup>, including ATVs, side-by-sides, as well as motorcycles and other similar vehicles. Double gates and road closure would prevent the associated safety/dust/noise/erosion/excessive motorized activity that is already surging in the MEDL area. We have already observed increasing numbers of large four-wheeler groups speeding up and down Schultz and Elden Lookout Roads, as well as, illegally driving on closed roads at dangerous speeds, e.g. on FR 6275, 6273, 9122J, and any area logging roads that were not blocked off.
- We suggest double gates on both ends of Schultz Pass Road (FR 420) as well.
  - o The first gate on the west side (near Hwy 180) could be at/near its current location and the second gate could be approximately ½ mile up the road where a second trailhead and parking could be located, e.g. in the open logging areas ½ mile up Schultz Rd on the left side. Another good location could be the large logging staging area ~1 mile up Schultz, just past the cattle guard on the right side. If placed here, it is suggested that another barrier/boulders/gate are placed on 6275, which forks off near here and is already a “Closed To Motorized Travel” road per Travel Management Plan.
  - o The first gate at the east end (near Highway 89) will remain in place (or placed where the new Equestrian area is) where it would be closed seasonally/as needed and the 2<sup>nd</sup> gate could be placed at the junction of FR 556 and FR 420 which would remain permanently closed, except for Admin/permitted purposes.



- These second gates will allow adequate access to Schultz Road area trails, but prevent excessive motorized activity and associated negative impacts. As mentioned above, we have presented shuttle bus transportation information to the CNF as well, and NAIPTA worked with us to produce a Transit Plan for Schultz Rd. We are happy to share this and discuss it again. A “trail bus” or open-air type of bus would travel between the recreation gates on Shultz Road on a schedule and recreationists could have further access in MEDL area. This would allow for access without the persistent negative impacts from excessive motorized vehicles, 4-wheelers, etc.

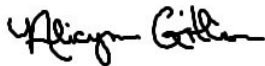
Sincerely,

Joseph Shannon



Chair, Sierra Club – Grand Canyon Chapter, Flagstaff-Northern Arizona Group

Alicyn Gitlin



Sierra Club – Grand Canyon Chapter

## References

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