

## Coconino Trail Riders

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September 7, 2007

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RE: **Comment letter for the Coconino Trail Riders regarding the Proposed Action for Managing Motorized Travel for the Coconino National Forest**

Dear Supervisor Rasure,

The Coconino Trail Riders (CTR) is a group of motorcycle single track enthusiasts. Our organization was formally incorporated over the past several years in order to have a voice in the "Five Forest Plan" to manage motorized use, and now the Final Travel Management Rule. We are a pro-active group that currently works with the Coconino National Forest to construct and maintain trail. Although our focus is definitely motorized single track trail, we have assisted in the construction of non-motorized trails on several National Trails Day events. Although we have only recently formally re-organized, many of our members have a history of involvement with comment and participation in trails management on this Forest going back over 30 years.

CTR members visit the Coconino National Forest for motorized recreation, mountain biking, hiking, backpacking, sightseeing, photography, rockhounding, hunting, fishing, wildlife and nature study, camping and other similar pursuits. Our members and supporters are interested in, and will be directly affected by Coconino National Forest's Motorized Travel Management Plan. Please incorporate these comments into the record and carefully consider our suggestions.

Comments:

**1) The process the CNF is using to comply with the TMR is fatally flawed and should be reconsidered.**

CTR is extremely concerned about the process being used to comply with the TMR. Stated as simply as we can; limiting the process to a focus on changes to the forest's existing transportation system and refusing to consider designating currently legal but unclassified routes will lead to a fatally flawed travel plan.

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Please do not misunderstand our comment here. CTR very much appreciates your statement in the cover letter regarding willingness to add some "user created" routes to the transportation system and we also appreciate your willingness to look at alternatives other than the Proposed Action. We also support the inclusion of the 40 miles of so-called "user created" routes referenced on page 7 of the Proposed Action (please see comment at #2).

However, the issue regarding how the CNF will address existing "user created" routes was discussed in some detail with your staff early on in the process -- yet the Proposed Action all but eliminates the existing user created trail systems on the CNF.

CTR is not suggesting the CNF should consider every single "user created" route existing on the ground today. Our point here that improvements in the travel system could be made if the agency would consider adding relatively small percentage of the currently existing network of "user-created" trails to the classified system. As written, the Proposed Action seems designed to "put off" adding these routes to some future date, when staff and resources are available.

This course of action fails to take advantage of provisions of the Travel Management Rule that allow the agency to correct deficiencies in the existing travel management. The decision to categorically exclude consideration of user created trails will not achieve the TMR's goal of formulating a system of road, trails and areas for motorized use. Indeed, it would result in increasing the deficiencies of the existing travel plan on the CNF.

If there is a genius in the TMR it is in the priority it has been given, and the universal support from all of the diverse stakeholder groups. Even environmental groups, who are traditionally opposed to motorized recreation, support the TMR. Complying with the TMR should be considered an opportunity to "get it right." It will never be easier or less expensive to formulate a forest wide road and trail system.

CTR representatives have been told that the CNF may choose to add "user created" trails sometime in the future, when staff and funding allow. But the effect of your Proposed Action is to change the legal status of these routes and thereby increasing the cost and staff time required to add these routes to the system. This decision results in real, concrete harm to CTR's members and other OHV users.

Most of the "user created" routes were legal travelways at the time of their creation and many are highly valued by the recreating public today. Some were even originally suggested by Forest Service personnel as reroutes of a Forest Service permitted enduro race. (This is a form of motorcycle competition based on exact riding skills that require arriving at a certain place at precisely the right time.) Some may be suitable, if not superior, candidates for inclusion in a final, well-planned route network.

Given both the documented popularity of motorized trail based recreation in Arizona and the input given to the agency by CTR and its members, it is impossible to believe that the needs analysis did not clearly show a need to consider user created trails in this process. We simply can not accept this process proceeding on its current course. It is impossible to overstate how critical this one issue is.

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We strongly encourage you to direct your staff to re-evaluate options for sufficient NEPA analysis of the trails we are proposing. We hope you will “think outside of the box” and look for ways to maximize resources and leverage existing relationships with user groups, governmental agencies and universities. Please consider aggressively pursuing the opportunities available to provide the motorized trail public with an enjoyable trail system.

2) Comments on Cover Letter:

The CNF’s cover letter states:

The Proposed Action focuses on changes to the forest’s existing transportation system; we are not proposing any change to existing authorized motorized trails or the Cinder Hills OHV area or areas currently closed or restricting motor vehicles. The Proposed Action includes amending the Forest Plan to prohibit “off-road” driving across the entire forest. However, we still plan to allow motor vehicles limited access off designated routes for the purpose of dispersed camping. We propose to close numerous roads that are unnecessary or redundant, or that cannot be adequately maintained, or that compromise the integrity of sensitive resources. However, we also propose to add some currently unauthorized or “user-created” routes to the forest transportation system in order to provide access to points of interest and maintain some longer distance loop-riding opportunities.

Comments:

**Re:** The Proposed Action focuses on changes to the forest’s existing transportation system; we are not proposing any change to existing authorized motorized trails or the Cinder Hills OHV area or areas currently closed or restricting motor vehicles.

Saying the Proposed Action focuses on changes to the forest’s existing transportation system is obvious. But the qualification after the semicolon indicates that the agency’s emphasis may be on the term “existing” and that the CNF does not wish to consider substantial changes to the CNF’s existing classified road and trail system. Indeed, this is exactly what the Proposed Action does. If our understanding is correct, this will lead to a flawed travel plan. Please see comment at #1.

CTR supports the decision not to make any changes to the Cinder Hills OHV area.

**Re:** The Proposed Action includes amending the Forest Plan to prohibit “off-road” driving across the entire forest. However, we still plan to allow motor vehicles limited access off designated routes for the purpose of dispersed camping. We propose to close numerous roads that are unnecessary or redundant, or that cannot be adequately maintained, or that compromise the integrity of sensitive resources.

CTR supports limiting motorized vehicle use to designated roads, trails and areas. The term “off-road” is not accurate, however, and does concern many who value trail based recreational experiences. We recommend the term “off-road” be replaced with “cross-country” or other more accurate term. CTR supports the provision to allow limited use of motorized vehicles off designated routes for dispersed camping.

CTR is concerned about the intent to close motorized routes because they are “unnecessary,” redundant” or because they “cannot be adequately maintained.” CTR strongly advises caution when considering a route is “unnecessary” or “redundant.” Routes that seem unnecessary in the spring and summer months become critical

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hunting access in the fall. Also, “redundancy” is not necessarily bad. For example, designating a route for unlicensed vehicles that is adjacent a road where mixed use is not appropriate may be a critical part of a manageable travel system. Another example is where a non-motorized loop or spur might be appropriate adjacent to a motorized route in order to reduce recreational user conflict.

CTR is also concerned about the “cannot be adequately maintained” statement. The agency must not make closure decisions based on lack of a federal budget under application of some sort of economic sustainability criteria. The Secretary of Agriculture gave direction at page 68281 of the November 9<sup>th</sup>, 2005 Travel Rule: “The Department does not believe that this scarcity (budget) should lead to blanket closures on NFS lands to recreation users. Volunteers and cooperators can supplement agency resources for maintenance and administration, and their contributions should be considered in this evaluation”.

It is well known that just about every program the U.S. Forest Service manages is under funded. Not only road maintenance, but recreational facilities maintenance, non motorized trail maintenance and even Wilderness trails budgets are insufficient to meet the current documented need. Yet, motorized vehicle trails have specific programs that provide funds for maintenance and monitoring. Using budgetary concerns as a reason for closure is arbitrary and capricious.

Re: However, we also propose to add some currently unauthorized or “user-created” routes to the forest transportation system in order to provide access to points of interest and maintain some longer distance loop-riding opportunities.

Again, we want to express our appreciation for your statement here. CTR is committed to working with you and your staff regarding adding “user created” routes to the classified road and trail system.

We must assume this statement is in reference to page 7 of the Proposed Action: “Add 40 miles of user-created routes to the forest transportation system. These routes will be managed as roads and will be open to public travel.”

It is extremely important to note these 40 miles are made up primarily of constructed roads that are unclassified and not part of the existing transportation system. These 40 miles are not what the general public thinks of as “user created” routes. In addition, none of these routes were created by recreationists or provide a true “trail experience.”

The cover letter also states:

Unfortunately, the Proposed Action will probably not meet everyone’s specific need or desire. For instance, several groups have expressed concern about the lack of motorized trails currently on the forest and they feel that opportunities for trail riding will be even less after off-road driving is prohibited. These groups suggested potential new motorized trails during the travel analysis process. Our preliminary effects analysis found resource concerns with some of these specific trail proposals; other suggestions were more general in nature and I determined that we did not have sufficient staffing or time to analyze these conceptual ideas. For these reasons, we did not include additional motorized trails in the Proposed Action, but I am willing to consider alternatives to this Proposed Action.

CTR is concerned that you or the planning team may have misunderstood some of the information provided earlier in the planning process (please see comment at #5). Perhaps more importantly, we are concerned the general public may not fully understand what the organized OHV community is proposing. This paragraph implies that most of the suggestions received by the CNF by motorized users were for "potential new motorized trails." This is not at all accurate. The trails we are proposing for designation are currently legal, existing motorized routes. Our suggestions focused on including certain of these "user created" routes into the classified road and trail system.

Based on our limited understanding of the agency's planning rule and NEPA requirements, the CNF should not dismiss substantial input submitted by a key stakeholder (the stakeholder groups that is most directly affected by the action) that is within the scope of the project without some discussion in the NEPA and planning document. We understand that your staff may have "resource concerns" with our proposals, but those concerns should be adequately discussed and disclosed in your planning documents. Stakeholders should be given an opportunity to review and critique the analysis and basis for your decisions. Without adequate disclosure, it is impossible to suggest mitigation or other alternatives that would address those resource concerns.

Finally, we wish to again state that we very much appreciate your willingness to consider other alternatives. Clearly, the Proposed Action does not meet the needs of the recreating public and other alternatives must be considered.

### 3) Use of the term "unauthorized"

CTR is concerned that the agency may use the term "unauthorized" in a manner which will, at best, lead to confusion and, at worst, illegally taint the planning process.

The term "unauthorized" now has a specific legal meaning pursuant to the Travel Management Rule. Correct understanding of the use of this term depends on timing: "unauthorized" at any time *prior* to the publication of the MVUM incorrectly implies illegality. This is despite the fact that historically used unclassified routes were often legally created, have never been formally closed by the Forest Service and are currently legal to use.

The Travel Management Rule specifically addressed the fact that many of the routes that exist on Forest Service lands are currently legal for motorized use even though they have not been formally authorized pursuant to a travel management planning process. The Rule should preclude improper characterizations of these routes (such as the term "unauthorized"), noting that "some user-created routes may be designated for motor vehicle use pursuant to § 212.51 of the final rule".

The use of the term in the Proposed Action and subsequent analysis clearly implies that the past and current motorized use of unclassified routes is illegal. The use of the term is confusing the general public as well as some stakeholder groups. Some interest groups, by mistake or strategic design, have misinterpreted this term and are suggesting that all of the routes described as "unauthorized" should be immediately closed and their exclusion from the travel plan should be a foregone conclusion. Some interest groups

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are telling their membership, and the general public, that the OHV community should not be “rewarded” for this “illegal” use.

The use of “unauthorized” should properly refer to routes/roads/trails that have been lawfully closed pursuant to the travel planning process. Conversely, the use of “authorized” should properly refer to routes/roads/trails that are legal for certain motorized vehicles subject to seasonal or other restrictions.

We are encouraging the agency, at the highest levels, to use another term to describe the existing network of motorized routes. Like it or not, once the Travel Management Rule was signed into effect, the use of the term “unauthorized” to describe a route that is legal for motorized use is no longer acceptable.

**4) The Proposed Action fails to achieve it stated goals or “purpose and need.”**

The goals of this project seem to be stated throughout the Proposed Action. Other than those contained in the TMR there are the desired condition statements and the Purpose and Need.

The failure to hit the target, so to speak, is the lack of adequate trail-based motorized opportunity. You may encounter this comment frequently thorough our comment letter. We should apologize in advance if we sound like a broken record. But it is a serious flaw in your plan.

In the “Desired Conditions” in the Motorized Trails and Areas section of your Proposed Action you state:

“When designating trails and areas, forests shall consider minimizing the following: (3) conflicts between motor vehicle use and existing or proposed recreational uses of NFS lands or neighboring Federal lands;”

“As per the Forest Plan, the desired condition of recreation is to, ‘Maintain a variety of forest trails that include foot, horse, bicycle, and *motorized trails* [emphasis added], and *challenge and adventure opportunities*.’” [emphasis added]

“Furthermore, guidelines for the 300,000-acre Flagstaff/Lake Mary Ecosystem Analysis (FLEA) area (Amendment 17) state: ‘Identify some motorized trail routes; Motorized trail opportunities provide long distance connections and meet ROS [Recreation Opportunity Spectrum] objectives; Convert some roads that are not needed for the road system into motorized trails and decrease to a width suitable for ATVs; Some Level 2 roads (high clearance vehicle use) may be used for portions of motorized trail routes (p. 206-69).’”

The PA fails to meet these goals by not providing an adequate recreational opportunity for forest visitors. While conflict and resource concerns are given priority, the visiting public is not. The PA fails to meet these goals because it designates only 24.5 miles of motorized trail. It is impossible to meet all of these worthy goals and objectives with only 24.5 miles of trail. In fact, this limited amount of motorized trail will lead to increased use by motorized users on this limited multi-use system, leading to greater user conflict issues in these areas. The agency has extensively documented the increase in

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popularity of OHV use. Public comment focused on the need for a trail based experience. CTR has been attempting to communicate the importance of the trail experience since the very beginning of this process. It is extremely disappointing to find our input wasn't taken seriously.

**5) The Proposed Action fails to adequately consider our comments submitted during scoping**

From the verbiage in the cover letter accompanying the PA, it is apparent that our input during your scoping was either poorly communicated, misunderstood or not considered.

In our letter submitting during your scoping process, we referenced three **existing** user-created trail systems: The "Around the Peaks Loop", the "Wing Mountain Loop" and the "Airport Loops". Although the cover letter mentioned preliminary scoping that found "resource issues" with new trails, it made no reference to consideration of these existing user-created routes.

If these comments were understood, then the PA fails to address our planning concerns. Once again, we point out the disparity between the CNF's own planning documents, the spirit and intent of the TMR and the Proposed Action's highly inadequate 24.5 miles of motorized trail.

**6) Comments on the Preliminary Issues:**

**The Preliminary Issues section does not seem consistent with other provisions of the PA nor is it complete.**

This seems to be a pretty serious flaw in the document. We had expected a full list of Planning Issues, including such things as Mexican Spotted Owl nesting sites, Native American cultural concerns, archaeological sites, etcetera. Without a full list of Issues it is very difficult to submit meaningful comment.

***Please do not misunderstand. CTR and its members are not insensitive to the impacts of motor vehicle use. It is our intent to mitigate, to the maximum extent possible, impacts of our proposal on natural resources. We want to address these issues. We just need to know what they are.***

Perhaps more importantly, we deserve the opportunity to review and comment on the way the agency addresses all of the Planning Issues. How do we provide information, comment on and critique the Issues when they are not disclosed in the Proposed Action?

There is another important flaw with the Issues section. On page 8, the PA states:

During the public collaboration phase of the travel analysis process, an issue was brought forward about the lack of motorized trails in the forest, especially after the forest prohibits cross-country motorized travel. The Coconino National Forest can consider alternatives to designate additional motorized trails to the forest transportation system. More specific route location information will

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be required in order to fully develop and analyze this alternative. New routes will be assessed using both 36 CFR 212.55(b) criteria for motorized trails, as well as consistency with Coconino Forest Plan management direction.

The PA fails to properly address this issue in the PA. The CNF has correctly identified a very critical planning issue. We had hoped the PA would have responded by including a few of the trails we proposed. Instead, the PA ignores the issue by not including any of the user created trails proposed by CTR.

Indeed, it could be argued that by closing all but 24.5 miles of motorized trail, the PA has responded to this issue by making the situation worse.

**7) Additional Planning Issues:**

**Proposed Planning Issue 1: Cumulative loss of OHV recreational opportunity**

The cumulative loss of recreational opportunity by those who are directly affected by this decision is a significant issue that should be incorporated into the analysis and into the decision making process.

Discussion:

The cumulative loss of recreational opportunity by those who are directly affected by this decision is a significant issue that should be incorporated into the analysis and into the decision making process. NEPA requires federal agencies to properly analyze the direct, indirect, and cumulative effects of the Preliminary Proposal. 40 C.F.R. § 1508.8. Cumulative effects include “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably-foreseeable future actions....”. 40 C.F.R. § 1508.7.

In NEPA, the term “environment” includes the “human environment” which “shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment.” 40 C.F.R. § 1508.14. Thus, the agency’s duty to analyze impacts does not end with impacts to the physical environment, but includes all of the effects on the human environment including the effects by vehicle assisted visitors.

Motorized recreational opportunity has and continues to be reduced throughout the region. Through the past several decades, there have been literally thousands of miles of roads and trails closed to motorized use in Arizona, Colorado, Utah and New Mexico. This is a prevailing trend here on the CNF as well.

For example:

- The Dry Lake Hills
- Schultz Creek Trail
- Fisher Point, Skunk Canyon, Fay Canyon, Sandy’s Canyon.
- Waterline Road
- The Kachina Peaks Wilderness

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-The Red Rock Country

As you know, other National Forests in Arizona are proposing significant reductions in available motorized recreational opportunity. The BLM is also reducing motorized opportunity. Recently, the Arizona Strip office of the BLM recently closed much of the existing motorized routes. Their new RMP mandates additional site specific route planning which will add to the closure list. Other motorized route closures are being implemented via various new Land Use plans and travel plans throughout all BLM offices in Arizona.

Sadly, the Proposed Action continues the trend of eliminating opportunity for vehicle-based recreation.

The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past.

The cumulative loss of motorized recreational opportunity should be brought into the analysis and incorporated into the decision making process. Significance criteria could include number of miles closed, number of acres closed or other similar quantifier.

The analysis should include a brief but accurate description of the current travel management rules on adjacent public lands. The analysis should also include a brief but accurate description of the ongoing travel management planning projects on adjacent lands as well as other public lands and National Forests in the region.

**Proposed Planning Issue 2: Trail experience distinct from road experience**

It is important to recognize the distinction between "trails" and "roads" during this planning process. Providing an arguably adequate road system does not in any way begin to address the demand for motorized single track trails. A quick assessment of the opportunities available for non-motorized trail users on the CNF shows that there is an understanding of the need for trails for hikers, equestrians and bicyclists. It is vital that the CNF understand that just as forest roads alone would not appeal to hikers, equestrians and bicyclists, forest roads do not fulfill the needs of motorcyclists. This Forest's planning documents reflect that understanding, but it's history of lack of adequate implementation does not. We ask that this planning process be used to correct that imbalance.

**8) Regarding Alternatives:**

**The importance of travel management warrants the formation of a wide range of alternatives other than the Proposed Action.**

NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to Preliminary Proposals or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9.  
"[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives."

40 C.F.R. § 1502.14. The alternatives section is considered the “heart” of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context).

A NEPA analysis must “explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14 (EIS); *Id.* at § 1508.9 (EA); *Bob Marshall Alliance*, 852 F.2d at 1225 (applying reasonable range of alternatives requirement to EA). A NEPA analysis is invalidated by “[t]he existence of a viable but unexamined alternative.” *Resources, Ltd. v. Robertson*, 35 F.3d 1300, 1307 (9th Cir. 1993).

The reasonableness of the agency’s choices in defining its range of alternatives is determined by the “underlying purpose and need” for the agency’s action. *City of Carmel-by-the-Sea v. U.S. Dept. of Transportation*, 123 F.3d 1142, 1155 (9th Cir. 1997); *Methow Valley Citizens Council v. Regional Forester*, 833 F.2d 810, 815-816 (9th Cir. 1987), *rev’d on other grounds*, 490 U.S. 332 (1989). The entire range of alternatives presented to the public must “encompass those to be considered by the ultimate agency decision maker.” 40 C.F.R. § 1502.2(e).

The agency is entitled to “identify some parameters and criteria—related to Plan standards—for generating alternatives....” *Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1522 (9th Cir. 1992) (italics in original). However, in defining the project limits the agency must evaluate “alternative means to accomplish the general goal of an action” and cannot “rig” “the purpose and need section” of a NEPA process to limit the range of alternatives. *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664, 669 (7th Cir. 1997) (emphasis added).

**There is a need for the agency to formulate a “maximum recreational opportunity” Alternative.**

According to the study, *Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE)*, from 1982 to 2001 OHV use became one of the fastest growing activities in the country. Between an earlier NSRE conducted in 1994-1995 and the time when the next round of NSRE data was collected, between fall 1999 and summer 2000, it showed a 32-percent increase. This represented a growth from about 27.3 million OHV users in 1994-1995 to about 36.0 million in 1999-2000. According to the Arizona Fish and Game Department website, “twenty percent of adult Arizonans identify themselves as motorized trail users.”

The need to provide for, or at least not reduce the current amount of routes available for motorized use, was a key theme during the many of the CNF’s pre-scoping meetings and discussions.

At the very minimum, the agency is lawfully required to formulate and analyze alternatives that, within the extent allowed by law and regulation, maximize recreational uses. We formally request the CNF formulate such an Alternative.

**IMPORTANT NOTE:**

The planning team must not make the mistake of assuming the “no-action alternative” serves as a “maximum recreation” alternative. The agency can not legitimately claim that

maintaining the current allowances and restrictions for OHV use and motorized travel is a viable “action alternative.” There are numerous and obvious reasons why this is so.

The “no-action alternative” in this case properly serves as a baseline to understand the current condition and the need for change and then compare and contrast how each alternatives address the issues. Please see comment below.

There is a need for the agencies to develop an accurate “no action” alternative.

The “no action” alternative should reasonably represent what is currently occurring on the ground in order to compare and contrast the various action alternatives. An accurate no action alternative is also necessary to assist potential environmental impacts from concentrating use into a smaller area (or miles). An accurate “no action” alternative is critical if the public is to understand and comment on what the agency is proposing to do. In order for the general public and decision makers to be able to estimate the effects of the agency’s Preliminary Proposal, Alternative A or the “no action” alternative must provide enough information to at least have a reasonable understanding of what the existing condition on the ground is.

#### 8. Specific Comments on the Preliminary Proposal:

The following is a list of specific concerns generated by members of our organization:

-The Final Travel Management Rule states, “Volunteer agreements with user groups and others have proven successful in extending agency resources for trail construction, maintenance, monitoring, and mitigation.” The Rule also states, “At times, resources are scarce, and the Department does not believe that this scarcity should lead to blanket closures of NFS lands to recreational users.” Also, the Executive Order for Facilitation of Cooperative Conservation, issued August of 2004 calls for the USDA to participate in “cooperative conservation” or “actions that relate to use, enhancement, and enjoyment of natural resources, protection of the environment, or both, and that involve collaborative activity among Federal, State, local, and tribal governments, private for-profit and nonprofit institutions, other nongovernmental entities and individuals.” The Coconino Trail Riders entered into a cooperative agreement with the CNF this year in order to formally participate in trail maintenance and construction. CTR has helped to implement and maintain many miles of planned trail that would probably have gone un-built or un-maintained without CTR participation. Our volunteer time has been leveraged into tens of thousands of matching grant dollars that the CNF has used to build even more trail. CTR stands ready to assist in the mitigation of resource concerns of any sort that might result from the implementation of an adequate trail system. The value of this partnership now and in the future should not be taken lightly.

-We ask that the CNF not use lack of funding as a reason to avoid addressing the legitimate concerns of the directly affected public. We recognize that this process is a daunting task and make ourselves available to assist in whatever way we can, but we request that we not be relegated to such a miniscule amount of trail.

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-Please Include all of the current alignments for the San Francisco Peaks Loop Trail, the Airport Trails, and the Wing Mountain Loop Trail into at least one of the Alternatives. These trails reflect qualitatively the experience that most motorcycle single track riders are looking for as they encompass a broad range of terrain, landscape, technical challenge and exploration opportunities. They are nominally acceptable quantitatively and at least begin to address the current demand.

-The "Secret Trail" connection from Upper Moto to Schultz Tank, as authorized by the Fort Valley Restoration Project Decision is not indicated on the map. This should be corrected.

-It has come to our attention that the Deer Hill Trail, built as COCOMUTS, has not been formally closed to motorized traffic with a Forest Order and is incorrectly signed as closed to motorized use. Please confirm this and indicate it as open to motorized use on the corrected map. When combined with the east side of the Around the Peaks Loop, this would be a functional part of a short to medium length loop adjacent to the Timberline/Doney park area which contains a large number of motorized trail users.

-The closure of all spur roads along 00420, Schultz Pass road, from 00743 north to 00553 is excessive and ignores a considerable amount of use from the Black Bill Park neighborhoods. The same issue is present for all of the spur roads along 00418 on the north side of the San Francisco Peaks. Some of these should be included as access for dispersed camping and hiking into the Wilderness.

-The retention of 06064D which is an arterial from Campbell Road to 00420 is appropriate. This road needs a higher maintenance designation.

-The road that connects 06064 to the south to 00556 should be included, as it allows alternate connectivity on dirt roads between the Timberline neighborhood and the Schultz Pass area, etc. Some of the other existing user created roads in this area might be considered as well as they afford a relatively low conflict, "back door" access for the adjoining neighborhoods. This type of access is particularly suited to younger riders who are not allowed to go long distances from home, but are allowed (by their parents), to ride ATVs and dirt bikes in the nearby Forest.

-The Road known as "Deadman Wash Road", situated between the White Horse Hills and Walker Lake Hill should be included in the system. This road provides much needed connectivity to the north from the Hart Prairie vicinity to the Kendrick Park area, east of Highway 180. Without this there is a 3-4 mile gap with no connector between Highway 180 and 09123E / 09007R. Also, the south side of the Deadman Wash Road has several spurs that attract a high number of campers during hunting season and "leaf-peeper" season. These spurs should be left with their associated dispersed campsites.

-The road leading between 00552 and 00418 through sections 14 and 12 should be restored to use. It has previously been a numbered road and is now closed at the junction with 00552, the Lockett Meadow road. This is a useful line for off-road and ATV users, and will be popular to link to 00553 leading out of Lockett Meadow to the east, connecting to 09128D, which has been closed in recent years at the west end. Thank you for restoring this to use.

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-Forest Service Road 00511A is shown connecting through Doney Park and providing Forest access. Unfortunately, this connection has been long severed by development, and the access doesn't exist. It appears that other mapped access points may no longer exist on the ground.

-The sole access point near to the FS 00511A connection cited above is off of the easterly terminus of Antelope Road at the North end of Stardust Trail. This access point currently receives considerable use, and should remain. It should connect to a legal roadway leading first east and away from existing housing, and then north and south to connect to Forest Service roads designated to remain. One direct route should be designated and signed north to the nearby Cinder Hills ORV area, replacing the current plethora of user-created routes leading to the same location.

-Many other public access points connecting to Forest Service lands appear to have been lost to development. The Forest Service should ensure that the eventual Motor Vehicle Use Map provides legal access to those access locations which remain. We suggest that the CNF work with all adjoining Forests, Coconino and Yavapai Counties, the City of Flagstaff, Sedona and any other appropriate governments to correct any right-of-way and easement issues or inconsistencies in management practices, such as big game retrieval, that are relevant to ensuring Forest access as it relates to designating roads and trails and other motorized uses in these interfaces.

-The Coconino Trail Riders' focus is motorcycle single track, and therefore represents only a fraction of off-highway trail users. We would highly recommend the CNF *actively* seek out involvement from other OHV user groups in order to flesh-out the representation of the interests of participants in these other forms of legitimate recreation. Failure to address the needs of ATV users in particular on a Forest wide level will ultimately lead to similar user conflicts from crowding on the remaining legal trails and area. Certainly, ATV users are a significantly larger, although less engaged, group of Forest users than we are. It is imperative that the Forest provide legitimate opportunities and education for these users in order to mitigate the impacts of their large numbers.

-The Coconino Trail Riders are completely amenable to working with the Coconino National Forest, U.S. Fish and Wildlife Service, archaeologists, environmental organizations, tribal representatives and any other interested parties to contribute to the development of the best results for our public resources and the people who enjoy them. We hope that the Coconino National Forest shares our enthusiasm for this goal.

The Coconino Trail Riders appreciate the opportunity to comment on this Proposed Action. We look forward to continuing our relationship with the Coconino National Forest, and working with yourself and your staff throughout the Travel Management process. We are submitting maps and GPS data for the San Francisco Peaks Loop Trail, the Airport Trails, and the Wing Mountain Loop Trail under separate cover. If there are any questions, please feel free to contact any of the undersigned officers and members of the Coconino Trail Riders.

September 7, 2007

**Comment letter for the Coconino Trail Riders regarding the Proposed Action for Managing Motorized Travel for the Coconino National Forest**

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Sincerely,

<signed>

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