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Department
of
Agriculture

Munds Park Roads and Trails Project

Forest
Service

**Mormon Lake Ranger District, Coconino National Forest
Coconino County, Arizona**

Southwestern
Region

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SUMMARY

The Coconino National Forest proposes to designate a multi-use roads and trails system that will offer motorized and non-motorized trail/road opportunities on National Forest System lands immediately adjacent to the community of Munds Park. The purpose of this roads and trails system is to provide quality recreational experiences for Forest visitors in the Munds Park area while maintaining and protecting Forest resources. The project area is located approximately 28 miles south of Flagstaff, and encompasses an approximate one-mile to two mile radius around the Munds Park area. The project area is generally defined by Forest Road (FR) 700 on the north, and the rim of Munds Canyon and the T Six Mountain road on the south, extending south along Interstate 17 to the Little Antelope interchange. The western portion crosses Interstate 17 near the Christiansen Rest Area. The eastern portion follows FR 240 from the north end of Casner Park, coursing north to Little Horse Park tank where it ties in with FR 700. The 9492D road coursing south from FR 240, connecting back to the T Six Mountain Road, also defines the eastern boundary, and is within the Mormon Lake Ranger District, Coconino National Forest, Arizona (see maps on pages 23 – 28).

This action is needed, because as the community of Munds Park and recreational use in general has grown, the National Forest adjacent to the community has suffered resource impacts and degraded quality of recreational experiences. Soils, watershed, and wildlife impacts are occurring due to unplanned or “social” trails, and motorized trail and road use. Some Forest System roads are redundant or in poor condition causing similar impacts.

The proposed action (Alternative A) may affect the quantity and quality of recreational trail use, eliminate off road vehicle use in the project area, and have effects on the community from noise, traffic, and increased visitor use. However, by establishing a managed, well-designed road and trail system to provide for motorized and non-motorized uses, including trailheads for parking, identified access points, and collector trails to reduce social trail proliferation, the impacts to soils, watershed and wildlife will be greatly reduced. This will also help to restore and maintain the forest character that makes the area desirable for these activities.

In addition to the proposed action, the Forest Service also evaluated nine additional alternatives:

Alternative B: This is the no action alternative. Under this alternative, no action would be taken and the existing condition would be allowed to continue. This means the existing network of social trails and roads, both non-motorized and motorized and their associated social and resource impacts would not be changed, improved or designated.

Motorized vehicles would continue to be allowed to travel cross-country on National Forest System lands around Munds Park, allowing continued riding opportunities for both street-legal and non street-legal ATVs. However, where unacceptable resource damage occurs, these routes or areas could be closed and enforced under a forest order prohibiting motorized use. In this case, without a designated trail system all off-road use would be eliminated.

In addition, the implementation of either the statewide or nationwide ATV/OHV policy on cross-country motorized travel would eliminate all ATV/OHV cross-country access around

Munds Park. These changes would require establishment of a designated trail system to continue to allow for motorized use on the National Forest. Camping would be allowed in the Crystal Point area. The designated trail system would consist of the Crystal Point Trail only.

Under a no action alternative no trailhead or improvements would occur off Iron Springs Road and the current motorized use would be allowed to continue. The Janice Place access would continue to provide for limited parking and the currently used social trails would remain open and likely see increased use.

Seven alternatives were considered but not analyzed in detail, as farther explained in the document. These included:

- Willard Springs Road Access Point: The Willard Springs Road Access point alternative was suggested as an alternative location to the Irons Springs Trailhead, as it was felt that this location would alleviate traffic and increasing use concerns in the community.
- Forest Road 78A near Frog Tank: This location was suggested as an alternative to the Iron Springs Trailhead for the same reasons as the Willard Springs Road Access option.
- Christensen Rest Area at I-17: This location was suggested for the same reasons as the two locations described above, and because substantial existing infrastructure is in place.
- APS Substation: This location was suggested for the same reasons as stated above, for the Willard Springs and Forest Road 78A areas.
- Janice Place: Several persons commenting suggested replacing the Iron Springs Trailhead and Parking Area with a trailhead and parking area behind the fence at the Janice Place access point.
- Non-Motorized Use: Several comments suggested making the entire area non-motorized or further restricting motorized use, such as creating a one-mile non-motorized use buffer around the community.
- Alternative or Additional Motorized Routes: There were comments suggesting additional motorized routes west from Iron Springs Trailhead and from the proposed motorized trail loop to the Little Horse Park Area.

Two additional alternatives were analyzed in detail:

- Alternative C: This alternative is the same as Alternative A, except that all trails from the Iron Springs Trailhead and Parking Area would be non-motorized.

- Alternative D: This alternative is the same as Alternatives A and C, except that the Iron Springs Trailhead and Parking Area is eliminated completely, and Forest Road 9457Y is gated for administrative use only at the boundary with the community.

Based upon the effects of the alternatives, the responsible official will decide whether or not to designate and manage a proposed system of roads and trails within this project area and under what specific conditions and locations. The decision will also determine whether or not to allow cross-country motorized travel in the project area. The decision will determine and identify trail access points and/or trailheads on National Forest System lands and those leading from the community to the forest.

CHAPTER 1 - INTRODUCTION

Document Structure ---

The Forest Service has prepared this Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This Environmental Assessment discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives. The document is organized into five parts:

- *Introduction:* The section includes information on the history of the project proposal, the purpose of and need for the project, and the agency's proposal for achieving that purpose and need. This section also details how the Forest Service informed the public of the proposal and how the public responded.
- *Comparison of Alternatives, including the Proposed Action:* This section provides a more detailed description of the agency's proposed action as well as alternative methods for achieving the stated purpose. These alternatives were developed based on significant issues raised by the public. This discussion also includes possible mitigation measures. Finally, this section provides a summary table of the environmental consequences associated with each alternative.
- *Environmental Consequences:* This section describes the environmental effects of implementing the proposed action and other alternatives. This analysis is organized by the environmental effects as they relate to the significant issue and its facets. Within each section, the affected environment is described first, followed by the direct, indirect and cumulative effects of each alternative.
- *Agencies and Persons Consulted:* This section provides a list of preparers and agencies consulted during the development of the environmental assessment.
- *Appendices:* The appendices provide more detailed information to support the analyses presented in the environmental assessment.

Additional documentation, including more detailed analyses of project-area resources, may be found in the project planning record located at the Peaks Ranger District Office in Flagstaff.

Background ---

Our concern is that as the community of Munds Park and recreational use in general has grown, the National Forest adjacent to the community has suffered resource impacts and degraded quality of recreational experiences. Soils, watershed, and wildlife impacts are occurring due to unplanned or "social" trails, and motorized trail and road use. Some Forest System roads are redundant or in poor condition causing similar impacts. A managed, well-designed road and trail system to provide motorized and non-motorized uses, including trailheads for parking, identified access points, and collector trails to reduce social trail proliferation will greatly reduce these impacts and help to restore and maintain the forest character that makes the area desirable for these activities. Our intent is to provide access that minimizes the impacts to the resources, private property, and residents, while providing reasonable recreational access and experiences.

The Munds Park Roads and Trails project is intended to provide a quality experience for both motorized and non-motorized users, including off highway vehicle (OHV) motorized users with motorcycles and all-terrain vehicles (ATVs), using 52 inch trail treads, and hikers, mountain bikers, and horseback riders on single-track trail treads, which are usually 24 inches. A designated trail system would provide planned, well-engineered trail routes. This intent was addressed by working with community members and identifying and emphasizing areas for motorized use and non-motorized use. Motorized areas are multiple-use whereas non-motorized areas would not allow motorized use.

Motorized Use: The complexity of managing motorized use on National Forest System lands integrates the legal aspects of operating ATVs (three-wheelers and four-wheelers) and motorcycles within the State of Arizona. Arizona State laws apply to drivers and their motor vehicles using National Forest System roads. Many Forest Service System roads are maintained to a public road standard thus requiring under Arizona State law, four-wheeled ATVs and motorcycles to be licensed vehicle. Three-wheeled ATVs are not allowed to operate on public roads in Arizona, as the state will not license them. Street-legal means the vehicle must have a license plate issued through the Department of Motor Vehicles that begins with the letters “MC”, be equipped with specific features required by the Department of Motor Vehicles, the owner must carry proof of registration and insurance, and the driver must possess a valid driver’s license.

For the purpose of this Environmental Assessment document, we will use the terms ATV and OHV to refer to both four-wheeled and three-wheeled machines and motorcycles. We will break out roads and trails open to street-legal or licensed ATVs – as described above – and non-street legal or unlicensed ATVs.

This project proposes designating a system of roads and trails for motorized use. The decision will designate which Forest Service System roads are managed for street-legal and non-street-legal use. The decision will designate motorized trails that are managed for non-street-legal use. (See Appendix B for legal status determinations for roads in the project area).

The Forest Service enforces regulations on National Forest System roads where we maintain sole jurisdiction. The County is the responsible agency to enforce State law on private and other public roads in the Munds Park community.

Currently the community is experiencing noise, traffic, and safety impacts from non-street legal ATV users accessing the Forest from county roads. Providing legal access in proximity to the community and the proposed trail system would alleviate some of this impact. While there is existing legal access if vehicles are hauled by trailer or truck to the Forest, this option is not being used by local users who want access from the community. A designed and designated trail system will improve this situation, especially if legal access near the community is provided.

Non-motorized Use: Constructing and designating trails would provide opportunities for long distance use with connections to the greater forest system, shorter trips, and other daytime use. Currently, social trail use occurs throughout the area, especially concentrated at pedestrian access points coming out of the community. The project would include a system trail that serves as a collector to channel motorized and hiking use to a well-designed route that ties in with the greater road and trail system of the forest. The current spaghetti network

of social trails would be rehabilitated and returned to natural conditions. The combination of the trails system design, designations, and a Forest Order that restricts off-road driving, has created the opportunity to establish a portion of the project area as uninterrupted non-motorized, which includes the area north of Forest Road 240, extending north and west to Forest Road 700, and east to the Section 11 east section line.

This EA deals with the complexities of designating and implementing a road and trail system in an area that holds great importance to a range of individuals and forest users. The focus will be for the benefit of the greater public, while understanding and mitigating potential impacts to affected and sensitive resources and the community.

Forest Plan Direction & Consistency: This project is consistent with both transportation policy/direction for roads and trails as well as direction for off-road driving management detailed in the Coconino National Forest Land and Resource Management Plan (as amended). Specifically, standards and guidelines for Road Maintenance and Management can be found in section L2 beginning on page 88 of the Forest Plan. This project is consistent with these standards and guidelines as it seeks to close, convert or obliterate roads “not needed for industry, public and/or administrative use.” On the following page, which is now replacement page 89 from Amendment number 6 (10/90), in section L01 there is direction to manage road densities to an average of 2 miles per section in the ponderosa pine/mixed conifer zone. This project will be consistent with this standard and guideline, as with road closures densities will be at or below the standard.

Forest Plan direction for trail system planning and inventory are also consistent with the intention of this project. These standards and guidelines can also be found beginning on replacement page 89. This direction applies most accurately to the existing Crystal Point trail, but would apply to new system trails designated by this project in that the trails will be monitored and maintained on a recurring schedule. In addition the Plan urges the Forest to promote volunteer opportunities such as an Adopt-a-Trail program. Such an effort is underway with the Munds Park Trail Stewards.

Opportunities for the management of off-road motorized vehicle use proposed by this project are also consistent with Forest Plan standards and guidelines. Forest-wide direction found in section A01 on page 58 has similar objectives to this project – to limit use or close areas to off-road and trail use “to prevent resource damage and/or user conflicts.” There is further direction to develop series of motorized loop trails and to work with the motorized user community to further identify and develop motorized recreation opportunities. As such, this project is consistent with this direction. A variety of criteria are listed on pages 58 and 59 for evaluating motorized use restrictions and closures. It is these criteria that guide the analysis later in this document.

Other Roads/Trails Planning/Management Efforts: The Forest Plan is not the only set of guidelines considered in this analysis. There are two major ongoing efforts to manage motorized cross-country, or off-road, travel that pertain to this analysis. First five National Forests in Arizona¹ are working jointly on a consistent motorized cross-country travel policy.

¹ The five National Forests in Arizona participating in this analysis are the Coconino, the Kaibab, the Prescott, the Tonto and the Apache-Sitgraves. The sixth National Forest in Arizona, the Coronado is conducting a similar but separate analysis under the revision of their Forest Plan.

On a nationwide scale the Forest Service is in the process of adopting national cross-country travel policy.

The statewide plan calls for a ban on cross-country travel by motorized vehicles, as does the proposed national policy. While neither policy has been finalized or adopted, drafts have been made available for public comment. Detail of both policies call for actions consistent with the scope and intent of this Munds Park project. For example, the statewide plan calls for a phased implementation process that would include site-specific analysis to identify and designate motorized travel routes - which is what this project proposes to do. The Munds Park project can be seen as ahead of its time in that regard, giving the motorized users of the Forest around Munds Park a great head start in the process of designating legal and legitimate motorized travel routes. Nothing in this project would contradict or conflict with policy or direction contained in either the draft statewide or nationwide proposals. Decisions on both the statewide and nationwide proposals are expected within the next year or two.

We have determined that the following resource conditions do not exist in the project area:

- Floodplains, wetlands, or municipal watersheds;
- Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas;
- Inventoried roadless areas;
- Research natural areas.

Purpose and Need for Action

Within the project area, there is a need to:

- Plan and construct a motorized and non-motorized trail system that provides high quality recreational experiences while protecting and enhancing natural resources, to the standards established in the Forest Service Trails Handbook. Provide motorized (ATV/motorcycle), hiking, equestrian, and mountain biking opportunities. Consider street and non-street legal ATV/motorcycle access adjacent to the community.
- Plan and manage a Forest Road system including validating or changing the road management objectives.
- Identify and/or construct, trailheads, parking areas, and informational signing, including trail access points, to support the roads and trails system.
- Identify a road and trail system that considers recreational uses with the protection of wildlife habitat, and other vegetation and soils resources. Locate trails; obliterate roads to mitigate negative effects to threatened and endangered species. Strive for positive human/wildlife habitat interactions.
- Obliterate and rehabilitate redundant trails and roads in excess to the managed system to return them to natural conditions. Where roads are needed for future fuels treatment projects, fire suppression and/or utilities access roads will be closed and gated.

- Establish a Forest Special Order that prohibits cross-country motorized travel and restricts motorized use to designated routes (36 Code Federal Regulations, 261.56).

Proposed Action

The development of a proposed action (project proposal) began in January of 2002. From that time to the present, the Mormon Lake Ranger District has been working with the Community of Munds Park/Pinewood to develop a system of roads and trails and take any other corrective actions necessary to address recreation management in the area. In January 2002, recreation staff from the Peaks and Mormon Lake Ranger Districts, in addition to representatives from Coconino County began meeting with representatives of the Munds Park/Pinewood community. One of the outcomes of these early meetings was that the community formed a non-profit group known as the Munds Park Trail Stewards, or MUTS, to continue to meet and dialogue with the Forest Service to address the roads and trails needs and planning for the area.

Throughout this time the Forest Service and the MUTS Group have worked hard at collecting information on existing conditions, and identifying user types, needs, and desires. This work has included a roads and trails inventory that involved collecting GPS data on most of the identifiable trails and routes. The MUTS group worked with Northern Arizona University to conduct a survey of Munds Park/Pinewood residents in March of 2002. This data has been used to help develop the Proposed Action. In the monthly MUTS meetings, roads and trails including location and types, access point, and trailheads have been discussed, with considerations of desired recreational experiences.

Since January 2002, there have been many meetings between the MUTS group and the Forest Service, at times on a monthly basis. These meetings have been open to the public and anyone interested has been welcome to attend.

Based on feedback received through the MUTS, a Forest Service interdisciplinary team composed of recreation, roads, watershed, wildlife, heritage resources, and vegetation specialists developed a proposed action.

Further explanation of how the Proposed Action fits into the legal framework required under the National Environmental Policy Act (NEPA) may help clarify how it fits into this environmental analysis. We often describe the work and interactions described in the background above, as the “plan to project” or sometimes, “the left hand side” analysis. This is the process that is used to arrive at a proposed action, and is sometimes termed “pre-NEPA”. The Proposed Action represents the initiation of the actual NEPA process, where documents and timeframes become more formal and legally structured. A proposed action is distributed to interested and affected parties, a process of more formal “scoping” which is used to identify any issues and concerns that will be addressed in the environmental analysis. Scoping often identifies issues, concerns, or other ideas that lead to additional alternatives to the proposed action; however the proposed action is always carried forward in the NEPA analysis. The Proposed Action represents the ID team’s effort at progressing towards desired conditions for the Munds Park Roads and Trails system through collaboration done to that point. A list of actions, including specific design features is also described. The Proposed Action for the Munds Park Roads and Trails Project is described under Alternative A. Through the scoping effort two additional action alternatives, Alternatives C and D have

been developed and analyzed. It is a requirement of the National Environmental Policy Act (NEPA) that a “no action” alternative be developed and analyzed. For this project the no action alternative is Alternative B. Actions presented will allow for continued recreation use under specific conditions and management direction that considers soil, water and vegetative conditions, wildlife needs, heritage resources and recreation experience. The proposed action meets the intent, standards, and guidelines of the Forest Plan.

Decision Framework

The Mormon Lake District Ranger of the Coconino National Forest is the Forest Service official responsible for deciding whether or not to designate and manage a proposed system of roads and trails within this project area and under what specific conditions and locations. The decision will also determine whether or not to allow cross-country motorized travel in the project area. The decision will determine and identify trail access points and/or trailheads on National Forest System lands and those leading from the community to the forest.

This decision is specific only to National Forest System lands. The Forest Service enforces regulations on National Forest System roads where we maintain sole jurisdiction. The County is the responsible agency to enforce State law on private and other public roads in the Munds Park community. The Forest Service is responsible for enforcement and management on designated National Forest System trails.

Public Involvement

As described above, once a proposed action was developed by the Mormon Lake Ranger District, the NEPA requires public involvement. In addition to working closely with the community, the Forest Service is obligated to also do broader scale public involvement that includes larger local, regional, and even national notification and notice of intent. Public involvement was integrated by:

Interested/affected individuals/groups were informed of this project on the quarterly Schedule of Proposed Actions (SOPA) beginning in the fall of 2002. This schedule is distributed to 500 individuals and/or groups. Most if not all of the interested public that has been actively involved in the project has been identified through more hands on contact through work in the community itself.

The project was included in the Annual Consultation Letter to 13 Native American Indian Tribes. There were no comments received from the tribes concerning this project.

A scoping letter describing the Proposed Action was mailed on July 11, 2003 to a mailing list of 160 people who expressed interest in the project, or who were otherwise determined to be interested or affected parties (adjacent landowners, organizations, agencies). In addition, as part of the public involvement process, the District conducted an Open House meeting on August 2, 2003. A news release was issued at the time the scoping letter was released. The Proposed Action was posted on the Coconino website. As a result of this 30 day comment period, we received over 270 comments to the Proposed Action, including letters, e-mails,

phone calls, and a petition that was submitted three times with a total of 205 signatures. These comments covered a wide range of topics and included both comments in support of the proposed action to calls for doing nothing, essentially the “no-action” alternative. However, concerns about the Iron Springs trailhead/parking area dominated the input. The petition referenced above called for elimination of the Iron Springs Trailhead. Other topics included noise, traffic and safety, which were usually related to the Iron Springs trailhead concern, but also important to some of the community and project areas as a whole. Access at Janice Place, law enforcement concerns, both in the community and on the forest, and conflicts between motorized and non-motorized uses were also common comments. These comments also often had some kind of tie to the Iron Springs concerns. There were also several suggestions for other trailheads, in lieu of Iron Springs trailhead.

An update letter was mailed February 26, 2004, to the original mailing list and to those who provided comment during the scoping period, including anyone that had signed the petition. This mailing included over 400 people, however, many of the petition addresses were undeliverable. In that letter we provided some additional information about the Proposed action, shared information on two of the key comment themes (trail access; community impacts), and provided an opportunity to share any additional comments on the project after considering the information provided in this letter. As a result of this 15-day comment period, we received 12 letters. These comments either supported previous comments and concerns or re-iterated other options to consider to the Irons Springs trailhead. There were no additional issues or concerns that had not been previously identified through scoping.

Through scoping and the update letter, there were little to no concerns with much of the proposed action, except from a few comments that preferred no action. In general, there was agreement on:

- The specific trails designs, designations, and locations.
- The proposed elimination of duplicate social roads and trails.
- Redesign of Crystal Point Trail into a loop trail.
- Constructing the O’Dell Lake pedestrian trail and the motorized loop designs were well supported.
- Establishing a cross-country motorized travel prohibition through an enforceable Area Closure Order was widely accepted.
- Restricting camping in the Crystal Point area was widely accepted.

There were concerns with:

- The Iron Springs trailhead/parking lot in association with noise traffic, and safety in residential areas, and potential for increased uses by non-resident visitors. Greater than 50% of the comments received were related to these concerns, and this resulted in several suggestions for alternatives that would place trailheads at different locations, such as the Willard Springs road area and other locations along road 78A, the Christensen Rest Stop Area, and the APS Sub-station area, and eliminate the Irons Springs trailhead. This concern and several associated facets of the concern have been carried forward as a significant issue.

- Associated with these concerns there were several comments with concerns about increased camping and associated litter and wildfire risk. These concerns have been addressed in response to comments, Appendix A.
- Motorized versus non-motorized user conflicts was a common concern, with some folks calling for elimination of all motorized use and some who felt additional motorized trails were needed. These concerns have been carried forward as a significant issue associated with the Iron Springs trailhead issue. Eliminating all motorized use was not carried forward as an alternative, and is discussed in the response to comments, Appendix A.
- Some concerns were pointed out about parking and access types at Janice Place due to safety. This concern is addressed in the Iron Springs trailhead significant issue later identified in this chapter.
- There were concerns about inadequate law enforcement both in the community and on the forest. These concerns are addressed in response to comments, Appendix A.
- There were some concerns about the survey and MUTS representation. This is addressed in response to comments, Appendix A.
- There were a few specific questions in relation to wildlife, wildfire, and waters effects. This is addressed in response to comments, Appendix A.
- Some questioned the expenditure of federal dollars on this project when there were higher needs in the world in general. This is addressed in response to comments, Appendix A.
- There were a few comments about specific motorized trail locations, with suggestions for different and additional routes. This is addressed in Alternatives Not Analyzed in Detail in Chapter 2 and in response to comments, Alternative A.

Using these comments from the public and other agencies, the ID team developed a list of issues to address. Meeting notes, field trip notes, and comment letters are located in the Project File. A complete and more detailed summary of response to comments is located in Appendix A of this document. Each and every comment, though grouped when the subject is similar, has been addressed in that document. Referencing that document one can identify where we were able to address the comment with further explanation. See below for further explanation.

Issues

The Forest Service separated the issues into two groups: significant and non-significant issues. Significant issues were defined as those directly or indirectly caused by implementing the proposed action. Non-significant issues were identified as those: 1) outside the scope of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; or 4) conjectural and not supported by scientific or factual evidence. The Council on Environmental Quality (CEQ) NEPA regulations require this delineation in Sec. 1501.7, "...identify and eliminate from detailed

study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)". A list of non-significant issues and reasons regarding their categorization as non-significant may be found in the summary of the comment analysis located in the project record (PRD# 214).

The comment analysis analyzed over 270 comments raised during public scoping. We grouped like and similar comments into 14 categories with 64 subtopics. These comments were then further analyzed and categorized as issues, concerns, non-issues (where the comment was a statement or opinion), and suggested alternatives. Suggested alternatives were often in relation to designating trailhead and parking in alternate locations to the Iron Springs site. Some suggested alternatives were in relation to non-motorized and motorized conflicts and suggested various ideas for eliminating motorized use, either in its entirety, or to be more restrictive in the area adjacent to the community. There were also suggestions for alternative and additional motorized trail routes. A further discussion of suggested alternatives is described in Chapter 2, Alternatives.

Analysis to further define issues and concerns was conducted to determine those that could be addressed through further explanation, mitigation to the proposed action, or could be addressed through the effects analysis in Chapter 3. Some concerns were determined to be "outside the scope" of the project and/or did not fit within the Purpose and Need of this project. For instance, some comments asked for actions that were in addition to or didn't apply to this proposal, or made request for actions outside Forest Service jurisdiction. Those comments that applied to the Purpose and Need, and indicated an effect caused by the proposed action were determined to be significant issues. These issues became the basis for developing and analyzing additional alternatives to the Proposed Action (Alternative A) and the required No-Action (Alternative B) in Chapter 2.

Concerns and Non-issue comments have been addressed in the response to comments and are included in Appendix A. Some comments raised during the July 2003 scoping period were summarized and addressed through the February 26, 2004 update letter.

After consolidation of the concerns we identified a key topic that covered the major themes of the remaining comments, and this was carried forward as a significant issue that caused us to consider, develop and analyze additional alternatives to the Proposed Action. The significant issue addresses the proposal to construct a trailhead and parking area approximately ¼ mile past Iron Springs Road. We have identified several facets associated with this issue. These facets will provide a basis for comparing the alternatives and the effects analysis, later in this document.

Based on public comment associated primarily with the Iron Springs Trailhead, an additional nine (9) alternatives were considered, developed and analyzed. Seven were considered, developed, and not analyzed in detail. Two more were considered, developed and analyzed along with the Proposed Action and No-Action alternatives.

The Issue: The proposal to construct the Iron Springs Trailhead and Parking Area is at issue. Many of the other concerns from public comment emanate from this issue. Opponents of the proposal want it removed in its entirety, while others are okay with a trailhead and parking area, but would prefer it be non-motorized only. There is also a component of citizens who think the trailhead and parking area should be retained in the proposal and feel it is important to the overall project.

Background: The Iron Springs Trailhead and Parking Area was proposed to provide local residents access to the National Forest recognizing that some residents and non-residents would prefer to drive and park to access the trail system in the north portion of the project. Also, providing parking at this location would provide legal access to the motorized trail system for non-street legal ATV users. Non-street legal ATVs are illegal to operate under State law on public roads. Public roads include County roads and most National Forest System roads. The Iron Springs Trailhead and Parking Area would make it legal for a non-street legal ATV to be hauled by trailer or truck to this location and operated on a designated system of National Forest System trails. The Iron Springs Trailhead would provide access to one motorized trail, which then connects with other motorized trails. A few National Forest System roads would intersect with these trails and allow non-street legal ATV use.

Two additional alternatives, Alternatives C and D, have been developed in relation to this issue and the following issue facets:

Facet 1: Having or Eliminating the Iron Springs Trailhead and Parking Area affects the opportunities for motorized and non-motorized use, with the elimination of one motorized trail connecting west to the motorized trail system. Alternative A analyzes the trailhead and parking area for both motorized and non-motorized access. Alternatives C and D were added to provide for parking for non-motorized trail access or no parking access in this area.

Facet 2: Conflicts between Motorized and Non-Motorized Use at Iron Springs Trailhead. There were numerous comments calling for retention of the Iron Springs Trailhead and Parking Area, but to make it non-motorized only, due to the conflicts that arise between motorized and non-motorized users. Alternative C was added and developed to provide for parking for non-motorized trail access.

Facet 3: Access from the community for non-street legal use is eliminated if the trailhead and parking area are not constructed, and thus there is no change from the existing condition (Alternative B)—no access for non-street legal users at Janice Place, Iron Springs or Forest Road 240 trailhead and parking area. Alternative A provides for this access. Alternatives B, C, and D will not provide this type of access. Legal access for non-street legal users is still available outside the immediate community boundary at places like Forest Road 78A – but not without a trailer.

Facet 4: Impacts on the Iron Springs neighborhood: This facet of the issue includes concerns that there will be increased traffic and noise on Iron Springs Road and that non-resident use will increase if the trailhead is established leading to disturbance to nearby residents and potential private property trespass. This will be compared in all alternatives. Alternative D addresses this facet by eliminating the trailhead and parking area.

This issue will be evaluated by a qualitative estimate of trail use as associated with trailhead locations under different alternatives, and the expected resource impacts of cross-country dispersed use versus managed trail use.

A qualitative evaluation will describe the effects of shared use of trails and trailhead facilities by motorized and non-motorized users. A qualitative evaluation will describe the effects of elimination of motorized trail experience by alternative, including elimination of non-street legal use.

CHAPTER 2 - ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This chapter describes and compares the alternatives considered for the Munds Park Roads and Trails Project. It includes a description of each alternative considered. Maps of each alternative can be found on pages 23-28. This section also presents the alternatives in comparative form, sharply defining the differences between each alternative and providing a clear basis for choice among options by the decision maker and the public. Some of the information used to compare the alternatives is based upon the design of the alternative (i.e., motorized versus non-motorized trails) and some of the information is based upon the environmental, social and economic effects of implementing each alternative (i.e., the amount of erosion or social disturbance of motorized trails versus non-motorized).

Alternatives Not Analyzed in Detail

Project record document #'s 179 and 180 summarize the variety of comments received to the Proposed Action. The Interdisciplinary (ID) Team discussed options for suggestions that were made through public comment. Proposed alternatives suggested by the public were in relation to alternative access points as potential substitutes for the Iron Springs Trailhead and in relation to motorized versus non-motorized use. Additionally, there were some suggestions for alternative or additional motorized routes.

Two ID Team field trips to review suggestions from the public as alternatives to the Iron Springs Trailhead and Parking Area were made on December 2nd and 3rd, 2003. Several of these alternatives were considered but not analyzed in detail as follows:

Willard Springs Road Access Point: The Willard Springs Road Access point alternative was suggested as an alternative location to the Iron Springs Trailhead, as it was felt that this location would alleviate traffic and increasing use concerns in the community.

This access option is available with or without the Proposed Action, as there is ample parking at numerous points along the road. This option would not address the project purpose to provide immediate community access for residents. From a longer-term and broader area perspective, this location could serve as a trailhead to access a variety of roads and/or trails. The Proposed Action did not integrate the user or trail/road needs in this area or adjacent to it but when we address transportation needs/opportunities in the future, we will consider this location and how it can or could connect with trails and roads in the Munds Park/Pinewood communities.

Forest Road 78A near Frog Tank: This location was suggested as an alternative to the Iron Springs Trailhead for the same reasons as the Willard Springs Road Access option.

There is a large meadow area that could accommodate a motorized multi-use trailhead. As the mountain meadow habitat is a scarce vegetation type in our forest, we felt a trailhead in this location could lead to unacceptable environmental impacts. These potentially include disturbance of wildlife and livestock using the adjacent water tank as well as impacts to the

tank itself from illegal off-trail motorized travel. While there are other locations along FR 78A to locate a trailhead, these locations would not serve or be convenient to local residents. In addition a trailhead near this location would not be responsive to an original intention of the project – to establish forest access points convenient to community residents.

Christensen Rest Area at I-17: This location was suggested for the same reasons as the two locations described above. The suggestion included rerouting access by closing the entrance off I-17 and establishing an access road from the community. As we researched this option, we were informed by Arizona Dept. of Transportation (ADOT) who is permitted specifically for the operation and maintenance of this rest area that they have considered reopening the rest area but it is uncertain of the timing. ADOT also indicated that it would not be feasible for the rest area to become a trailhead because both are different uses that could conflict. This location would also change the scope of the project by attracting and increasing use substantially from non-residents, which is not the purpose. Given that access from I-17 could not be eliminated, this location would lead to the area becoming a “destination” because of its location off Interstate 17 and being closer to the Phoenix area. This location, like the Forest Road 78A proposal is contrary to the purposes of the project.

APS Substation: This location was suggested for the same reasons as stated above. Like the Forest Road 78A and Christensen Rest Area proposals, this location does not address the purpose of the Iron Springs and Janice Place access points as none of the proposed motorized trails connect to this area. This proposal was not carried forward as a driving factor because the project was to establish Forest access and both motorized and non-motorized trails in areas the community is currently using. Our analysis has shown that there is little public use of the Forest around the APS Substation. In addition, this location could attract itself as a destination access due to its visibility and easy access from Interstate 17

Janice Place: Several persons commenting suggested replacing the Iron Springs Trailhead and Parking Area with a trailhead and parking area behind the fence at the Janice Place access point. After field review we determined that while it was feasible to engineer a trailhead/parking area at this location, the proximity to private residences made this an inappropriate place for a trailhead. While we can place a trailhead/parking area at the Iron Springs location largely out of sight and noise distance from private residences, there is not room to do so at the Janice Place location. We have identified that there is some room outside the fence to safely park a few vehicles without trailers, especially if some slight improvements are made by improving with gravel and fill the area currently used for parking. However, due to concerns with space and safe turning and stopping distances on Janice Place, vehicles towing trailers would be prohibited from parking at this location. Thus, while street legal ATV users can legally access the motorized trail system at the Janice Place location, non-street legal access would not be available without the ability to trailer. As such, this location is not suitable as a replacement to the Iron Springs location.

Non-Motorized Use: Several comments suggested making the entire area non-motorized or further restricting motorized use, such as creating a one-mile no-motorized use buffer around the community. This suggested alternative does not meet the purpose and need to provide a motorized and non-motorized trail system around the community. Motorized use is considered a valid use of the National Forest. It is the intention of this project to locate opportunities for both uses, and through a designated system, reduce user conflicts and resource impacts. Further, the intent of the project is to funnel motorized use away from the

community limiting direct impacts from such use on the community. It is outside the scope of this project to eliminate motorized use on the forest in this area completely.

Alternative or Additional Motorized Routes: The suggested routes were either located in or lead into Mexican spotted owl habitat and/or conflicted with the emphasis area establishing a contiguous area of non-motorized use such as in the northwest portion of the project area. These routes conflict with the desire to reduce resource impacts and were not carried further in this analysis.

How the Alternatives Were Developed _____

All action Alternatives are largely the same as Alternative A, with the exception of eliminating motorized access from the Iron Springs Trailhead and Parking Area under Alternative C and the complete elimination of Iron Springs Trailhead and Parking Area under Alternative D. Under Alternatives C and D there would be no non-street legal access for ATVs from the community to National Forest System lands in the Iron Springs area. For additional description of the facets associated with the alternatives as they relate to the Iron Springs issue, refer back to Chapter 1.

Alternative A: This is the Proposed Action. The Proposed Action was developed after a considerable amount of collaboration with the community to create a managed and designed road and trail system to provide motorized and non-motorized uses, including trailheads for parking, identified access points, and collector trails to reduce social trail proliferation.

Throughout 2002 and 2003 the Forest Service and the Munds Park Trail Stewards (MUTS) collected information on existing conditions, and identified user types, needs, and desires. This work included a roads and trails inventory that involved collecting GPS data on most of the identifiable trails and routes.

The MUTS group worked with Northern Arizona University to conduct a survey of Munds Park residents in March of 2002. This data has been useful in helping to develop the Proposed Action alternative. In the monthly MUTS meetings, which were open to all interested citizens, roads and trails including location and types, access point, and trailheads were discussed, with considerations of desired recreational experiences.

Through these interactions the Proposed Action alternative was developed as an option to greatly reduce environmental and social impacts and help to restore and maintain the forest character that makes the area desirable for these activities. Additionally, the intent of this alternative is to provide non-motorized and motorized recreational opportunities and balance impacts to resources, private property, and residents. One of the specific differences between Alternative A and Alternatives C and D is that street legal ATVs and non-street legal ATVs towed on trailers or hauled by passenger vehicle could have immediate community access to the trailhead/parking area at Iron Springs.

Alternative B: This is the no action alternative. Under this alternative, no action would be taken and the existing condition would be allowed to continue. This means the existing

network of social trails and roads, both non-motorized and motorized and their associated social and resource impacts would not be changed, improved or designated.

Motorized vehicles would continue to be allowed to travel cross-country on National Forest System lands around Munds Park, allowing continued riding opportunities for both street-legal and non street-legal ATVs. However, where unacceptable resource damage occurs, these routes or areas could be closed and enforced under a forest order prohibiting motorized use.

In addition, the implementation of either the statewide or nationwide ATV/OHV policy on cross-country motorized travel would eliminate all ATV/OHV cross-country access around Munds Park, as no designated trail system would be developed. Camping would be allowed in the Crystal Point area. The designated trail system would consist of the Crystal Point Trail.

Under a no action alternative no trailhead or improvements would occur off Iron Springs Road and the current motorized use would be allowed to continue. The Janice Place access would continue to provide for limited parking.

Alternative C: This alternative is the same as Alternative A, except that all trails from the Iron Springs Trailhead and Parking Area would be non-motorized. This alternative has been developed in response to the issue, particularly in consideration of Facet 2 that pertains to motorized versus non-motorized use at this location.

This facet of the Iron Springs Trailhead was identified during public scoping through comment to the Proposed Action. This alternative will not construct any motorized trail from the Iron Springs Trailhead and eliminate the proposed one motorized trail (.7 mile) that connects west to additional motorized trails. Vehicular parking for non-motorized hiking opportunities would be provided.

Access from Iron Springs Road onto FR 9457Y to the trailhead would be passenger car only (no ATV access allowed). This alternative would eliminate the potential for motorized versus non-motorized trail conflicts on the trails emanating from the Iron Springs Trailhead. This does not eliminate the possibility of motorized versus non-motorized trail conflicts on the system as a whole, as there are still multi-use trails in the project area. This alternative eliminates parking for motorized uses and opportunities for non- street-legal ATV access to the motorized trail system from the community.

Alternative D: This alternative is the same as Alternatives A and C, except that the Iron Springs Trailhead and Parking Area is eliminated completely, and Forest Road 9457Y is gated for administrative use only at the boundary with the community. As in Alternative C the motorized trail connecting to the motorized loop trail, leaving from the Iron Springs trailhead, is eliminated. The non-motorized trails would remain though access would not include a parking area on the forest. Parking to access these trails would be on residential streets as legally allowed and/or by residents walking or biking. This Alternative responds to the issue raised during public scoping in comments to the Proposed Action. By eliminating the Iron Springs Trailhead there would be a reduction in non-motorized and motorized trail encounters and a reduction in the level of access for both residents and non-residents by the elimination of motorized access from Iron Springs.

Items Common to All Action Alternatives

The following items are part of the proposed trail design and management, including design features and coordinating requirements:

- Design non-motorized trail width to approximately 24" in accordance with U.S. Forest Service trail management guidelines. Non-motorized trails will be open to foot, horse, and mountain bike travel except for O'Dell Lake which will open only to foot traffic. These trails are closed to all motorized uses.
- Design motorized trail width to approximately 52" in accordance with US Forest Service trail management guidelines. Motorized trails will be open to ATVs/OHV's with a 52" wheelbase or less and motorcycles, as well as all non-motorized uses. These trails will not be open to jeeps or motor vehicles wider than 52".
- Lay out the trail system to minimize impacts to sensitive plants or significant archeological features. As needed, a biologist/botanist or an archaeologist would be consulted to verify plants or features and to monitor trail routing.
- Conduct pre-construction surveys, as needed, for Forest Service sensitive plant species (*Astragalus rusbyi*, *Penstemon nudiflorus*, *Helenium Arizonicum* and *Hedeoma diffusum*). Conduct surveys in potential habitat along the route prior to trail construction. The surveys would provide for optimum detection and protection of sensitive plants. Personnel involved in the trail construction would be trained in the identification of these plants to expedite survey efforts.
- Conduct pre-construction surveys for noxious weeds. Prior to final trail construction, crews would be trained to identify noxious weed species. Should populations be found, workers would determine a course of action to eradicate plants and/or prevent spread.
- Cut trees as needed for the proposed trail route construction. Avoid cutting snags, pine, fir or juniper trees greater than 9 inches diameter, or oak trees larger than 5 inches diameter at root collar.
- Encourage trail users to keep pets on a leash through signing and trail steward contacts. Prohibit allowing dogs off a leash on the O'Dell trail due to concerns with riparian vegetation and wetlands wildlife being displaced or impacted.
- A Conservation Measure for the Biological Assessment and Evaluation is to prohibit camping along the portion of Crystal Point trail within ½ mile of the Mexican spotted owl Protected Activity Center. This will be accomplished with the camping closure order.
- A Conservation Measure for the Biological Evaluation is no construction or obliteration activities will occur from March 1 through August 15 at O'Dell Lake if osprey nest is active.
- A Conservation Measure for the Biological Assessment and Evaluation is that no construction of the loop trail at O'Dell Lake will occur between October 15th and August 31st so that construction occurs outside of Bald Eagle wintering season.

- A Conservation Measure for the Biological Assessment and Evaluation is that no construction or obliteration activities will occur during the Mexican spotted owl breeding season (3/1 through 8/31) within Mexican spotted owl PACs.
- A Conservation Measure for the Biological Assessment and Evaluation is that no construction or obliteration activities will occur during the northern goshawk breeding season (3/1 through 9/30) in northern goshawk nest stands.
- Follow the Archaeological Clearance Report for this project. The Munds Park Roads and Trails Archaeological Clearance Report (CNF Project #2004-37-A) documents archaeological inventory and compliance with the National Historic Preservation Act of 1966, as amended, for this project. The report is programmatic in nature; for this reason, any new ground disturbing activities in previously un-surveyed areas will require additional survey and a subsequent clearance report prior to project implementation. The programmatic clearance calls for site-specific protection measures for implementation, with the stipulation that all National Register eligible and potentially eligible prehistoric and historic sites will be avoided by ground disturbing activities and these sites will be monitored during project implementation. Specifically, sites AR-03-04-05-203, -481, -516, -517, -518 and Segment C of the Munds Park to Howard Spring Historic Logging Railroad (AR-03-04-05-591) will be marked before project implementation and avoided by all ground disturbing activities pursuant to FSM 2361.1(2) and FSM R-3 2361.21(2). Additionally, these sites will be monitored during project implementation to ensure their protection. Sites AR-03-04-05-142, -143, and -202 have been declassified and are no longer considered archaeological sites. Site AR-03-04-05-816 was determined ineligible for the National Register of Historic Places as part of this project. The declassified sites and the ineligible site do not require further protection.
- The primary season of use of the proposed trail system would be mid-May through mid-October. The parking area on Forest Road 240 will continue to be signed and managed during the winter months for snowmobile use.
- Best Management Practices for trail construction as identified in the Forest Service Trails Handbook and Specifications for Construction and Maintenance of Trails.

Alternatives

The following alternatives are considered in detail. See the maps located at the end of this chapter.

Alternative A

The Proposed Action

Designate and construct a multi-use roads and trails system that will offer motorized and non-motorized opportunities immediately adjacent to the Community of Munds Park/Pinewood. This road and trail system is designed to designate roads and trails, which provide quality recreational experiences adjacent to the Munds Park community. The proposed trail system is estimated at approximately 22 miles, of which approximately 7 miles are motorized and provide linkage into existing Forest Service roads, and 15 miles of which are non-motorized. Forest Road 9457Y would be improved from its junction with Iron

Springs Road at the Forest boundary approximately ¼ mile or more to a trailhead and parking area. This trailhead would provide access for both non-motorized and motorized users. Legal access for non-street legal ATV users would be accommodated as they could trailer their ATVs to the trailhead and connect to a trail west to the motorized trail system. The non-motorized trail system includes the existing Crystal Point Trail. The road system exists and no new roads will be constructed. Some existing roads are proposed for obliteration and or closure and/or for conversion to trail (see maps on pages 23-28).

This system will specifically include the following:

- 1) Two trailheads will provide parking. A new designated trailhead will accommodate approximately 10 vehicles with trailers, located approximately ¼ mile north of Iron Springs Road on FR 9457Y. An existing designated trailhead on FS 240, just east of Munds Park on the Forest near the east end of Pinewood Blvd, accommodates approximately 20 vehicles with trailers. Both trailheads provide access to existing and proposed Forest System roads and trails, which service motorized and non-motorized uses. The Iron Springs Trailhead is the only established parking site for legal access to the motorized trail system for non-street legal vehicle users immediately accessible to the community.
- 2) Non-motorized Forest access will be retained at the current access points are located at Janice Place, Redwood Drive, and O'Dell Lake (see maps on pages 23-28). The O'Dell lake trail access point is via county road Lake Meadow Drive. These designations indicate access points at the end of County roads adjacent to National Forest System lands where trails access begins. There is no parking at these locations either on the forest or the county roads, as these are not intended to be trailheads and only indicate trail system accessibility for those walking or biking to the gate.
- 3) Trail access at the Janice Place location will be multi-use, including, motorized use by ATVs and motorcycles, as well as foot, equestrian, and mountain bike use. The trail accessed at this location is designed for ATV use, with a 52" wheelbase or less, and the existing gate will be re-designed to prevent entry by vehicles larger than ATVs. No trailhead is being proposed at this location. There is limited parking on FS land outside the fence/gate, within the County right of way at this access point. There will be no parking inside the fence/gate. This access point is focused on providing access for users to walk, bike, or ride street-legal ATVs or motorcycles to this trail. While some parking is available, users requiring parking will be encouraged through signing to use the trailhead access at FR 240 or the trailhead at FR 9457Y. Vehicles towing trailers will not be allowed to park at this location.
- 4) The loop portion of the trail at O'Dell Lake will be pedestrian only for .7 miles. No mechanized equipment, such as mountain bikes, will be allowed on the loop to minimize disturbance to adjacent wildlife habitat. This trail could be upgraded in the future to Americans with Disabilities Act standards to accommodate both motorized and non-motorized wheelchairs. Such an upgrade would still prohibit other motorized and mechanical uses of the trail.
- 5) Eight miles of new trail construction, of which approximately 1.0 mile is new construction for motorized trail, and approximately 7.0 miles is new construction for non-motorized trails.

This will result in a total system of approximately 3.0 miles of class 2 trail² and approximately 19 miles of class 3 trails, with linkages to forest roads for long distance travel beyond the project boundary. The .7 miles of trail loop at O'Dell Lake will begin as a class 3 trail. However, it is intended that as funding becomes available that this trail could be upgraded to a class 4 interpretive trail.

6) Inclusive within the 22 mile trail system is 4 miles of road to trail conversion. Road to trail conversion is accomplished by obliteration and /or rehabilitation of a road, while leaving a trail tread using a portion of the old roadbed. This is done where the location of a road is suitable for trail location, but for various reasons, the existing road is undesirable for continued full-size motor vehicle traffic. Reasons may include factors such as resource damage, desired non-motorized use, road density, and enhanced user experience, etc.

7) Existing social trails (user-created routes) will be incorporated into the designed system where applicable and not causing resource damage. Remaining social routes will be rehabilitated as described in Item 8 below. The numerous existing pedestrian access locations originating from private land along the north boundary of Munds Park will remain for non-motorized entry into the forest. This access will remain open and accessible, but a collector trail to the north of these access locations will be used to discourage the further proliferation of user-created routes. The user-created routes originating from these access points will be evaluated and a main route will be selected to connect to the collector trail while the others will be returned to natural condition. People can still walk and hike through this area from the private and public access locations, but the numerous user created routes in this area will be returned to natural landscape. This rehabilitation work removes the so-called "spaghetti" network of user created trails and focuses use on designated and maintained routes. Public access points located at Mescalero Drive, Mountaineer Drive, Hillside Drive (east and west), Bowstring Road, and Winding Trail will remain open.

8) Forest system roads, social roads, and social trails that are redundant or excess, causing resource damage or not identified as part of the designated road and trail system will be obliterated and naturalized. Currently there are approximately eight miles of Level 2 system roads identified for obliteration or closure³. In addition there are approximately 4 miles of road proposed for conversion to trail. A variety of techniques may be used to obliterate or

² Class 2 trail is defined as simple/minor development of a discernible, continuous trail, but narrow and rough, made of native materials, with occasional obstacles, all in a natural essentially un-modified environment. Class 3 trail is defined as developed and improved trail with an obvious and continuous tread, unhindered one-lane travel, typically made of native materials, with infrequent obstacles and vegetation is cleared outside of the trailway, all in a natural primarily un-modified environment. Class 4 trail is defined as highly developed trail, with a wide tread relatively smooth; trail width may consistently accommodate two-lane traffic; trail is made of native or imported materials, and maybe hardened; structures are frequent and substantial, including trail bridges, and trailside amenities may be present; there is a variety of signs present, including information signs and Trail Universal Access information at trailheads, all in what may be a modified environment.

³ The US Forest Service uses the following classes or levels to designate a Forest Development Road's operation and objective maintenance level: Level 1: closed; Level 2: a native surface road passable by four-wheel drive or high-clearance vehicles; Level 3: a graveled or improved surface road passable by passenger cars with a reasonable degree of comfort; Level 4, a paved road or highway passable by passenger cars with a high degree of comfort.

naturalize a road or trail, including ripping the entire roadbed or tread with a dozer and only ripping portions of the roadbed or tread. If natural healing is occurring and only sections of the route present resource problems, obstructions may be placed to allow the roadbed or tread to heal naturally. Also gating will be used to close routes where there is a need for access for administrative purposes, but general motorized access is undesirable. Utility maintenance and fire access is a good example of administrative access need. (See Appendix B for a table listing the specific road closure and obliteration needs and maps on pages 23-28 for road locations).

9) A Forest Order prohibiting motorized use off designated roads and trails encompassing approximately 7,500 acres will be implemented in conjunction with the designated road and trail work. Closure to motorized cross-country travel will help make rehabilitation efforts more successful, help to keep the designated system intact, and help to prevent further proliferation of social roads and their associated resource concerns. (See maps on pages 23-28 for closure area location and boundary).

10) A Forest Order prohibiting camping on approximately 620 acres in the vicinity of Crystal Point will be implemented for wildlife habitat protection, (See maps on pages 23-28 for closure area location and boundary).

Alternative B

No Action

Under the No Action alternative, current management plans would continue to guide management of the project area. No changes would be made to the current Forest Service road and trail system. There would be no road obliteration activities, road to trail conversions, trail construction, or trail designations for specified use implemented. The associated area closures for camping limitations and off road travel would not be implemented. Under this alternative current use is unchanged, there are no adjustments made for resource protection, user conflicts, community impacts, or response to anticipated growth.

Alternative C

This alternative is the same as Alternative A except that all trails from the Iron Springs Trailhead would be non-motorized. Changing the use from motorized to non-motorized will eliminate the need for the motorized connection to the greater motorized trail system proposed in Alternative A. The proposal already includes a non-motorized trail that will suffice for access from the Iron Springs trailhead. This will create the following changes:

- 6.3 miles of motorized trail system. A reduction of one trail of .7 miles from Alternative A.
- As there will be no motorized trail access from the trailhead and to alleviate the concern of increased ATV traffic on adjacent streets, ATV parking and use of Forest Road 9457Y will not be permitted. With the exception of passenger vehicles no motorized vehicles including ATVs and motorcycles will be permitted on Forest Road 9457Y from the Forest boundary to the trailhead.

- Non-street legal ATV access from the community is not available within the project area. Access for non-street legal ATV access would be retained outside the project area and residents would have to trailer or haul their ATVs to these locations.

Alternative D

This alternative is the same as Alternatives A and B, except the Iron Springs Trailhead and parking lot is eliminated and FR 9457Y road will be closed for administrative use only (gated). Under this alternative there is no trailhead or parking lot constructed ¼ mile north of Iron Springs Road. The motorized trail eliminated in Alternative C is also eliminated under this alternative. This will create the following changes:

- 6.3 miles of motorized trail system. A reduction of .7 miles from Alternative A.
- Elimination of one trailhead and parking for 10 vehicles, leaving no opportunities for parking on National Forest System lands off Iron Springs Road. Forest visitors would need to walk or ride bicycles to access the non-motorized trails off Iron Springs. Parking would still be available on residential streets as allowed under County laws.
- The trail access from Iron Springs Road and Forest Road 9457Y is non-motorized only.

Comparison of Alternatives and Maps

Table 1: Comparison of Alternatives

A – Proposed Action	Facet 1: Opportunities for motorized and non-motorized use.	Iron Springs TH/Parking lot is constructed. Provides parking for hikers and motorized trail users with trailers – up to 10 parking sites. Access is 9457Y Road via Iron Springs Rd. Emphasis is on local resident use. Some increase in use above current expected but not beyond 1-3% that will occur without the TH. Provides access to one motorized trail that connects to the west with other motorized trails.
	Facet 2: Conflicts between Motorized and Non-Motorized Use at Iron Springs Trailhead	TH/Parking lot and related trail system is multi-use. One motorized trail and 3 non-motorized trails leave from this TH. Motorized trail connects to motorized trail loop system. Opportunities for non-motorized trail experience provided. Cross country travel closure order implemented which reduces resource impacts and user conflicts. Uses are separated and managed so users can select the experience they want
	Facet 3: Access from the community for non-street legal use	Provides access and parking for non-street legal ATV riding. No non-street legal ATV riding is allowed on 9457Y, vehicles must be trailered to the parking lot. Provides non-street legal users ability to park and ride legally without using residential streets. Street legal ATVs can access the trailhead from the community. Access is in close proximity to the community and to the designated motorized trail system. There is a change in the level of traffic, noise and intrusiveness to private land.
	Facet 4: Impacts on the Iron Springs neighborhood	Provides access and parking for non-street legal and street-legal motorized users and well as non-motorized uses at least ¼ mile away from private residences. Traffic accessing trailhead would occur on residential streets such as Iron Springs Road by both full-size vehicles and ATVs. The trailhead provides an alternative to parking and trespass on private property. The cross-country travel prohibition would reduce the impacts of motorized use close to residents. Designating motorized trails would reduce the amount of the project area affected by motorized use especially adjacent to the neighborhood.
B – No Action	Facet 1: Opportunities for motorized and non-motorized use.	Munds Roads and Trails System, including Iron Springs TH is not constructed or implemented. Current resource damage continues, no change to noise or vehicle traffic impacts except for unmanaged increases. Conflict continues between motorized and non-motorized forest users because they overlap each other in all but one location (Crystal Point trail). One trail provides designated trail access – Crystal Point. Motorized and non-motorized use immediately adjacent to residents results in resource and social concerns under the existing use. Unacceptable resource damage is site-specifically addressed by prohibiting uses through an enforceable forest order – this could occur on social trails, roads and/or within an area. Current use and residential access levels continue. Expected use increases of 1 to 3% per year. (Same as Proposed Action). Any existing traffic, parking, and noise concerns and/or conflicts continue as present and worsen over time.
	Facet 2: Conflicts between Motorized and Non-Motorized Use at Iron Springs Trailhead	No change from current un-managed use. Both types of use continue to occur on non-engineered social trails and roads, cross country use unrestricted, and degradation of soil, vegetation and wildlife habitat resources continues and becomes worse over time. Current motorized and non-motorized user conflicts continue and potentially worsen over time.
	Facet 3: Access from the community for non-street legal use	No change to current noise and traffic impacts in the community from both legal and illegal users using residential streets to access the Forest. Due to unmanaged use this impact increases over time. Current legal access for non-street legal users stays the same, which is none emanating from the community.

	Facet 4: Impacts on the Iron Springs neighborhood	No change to the current noise and traffic impacts on residents in the area of Iron Springs Road. Due to unmanaged use this impact will increase over time. Since motorized use is allowed everywhere, noise and traffic impacts on residents will continue to cause impacts.
C – Iron Springs TH with Non-motorized use only	Facet 1: Opportunities for motorized and non-motorized use.	Iron springs TH/Parking Lot is constructed. One motorized trail .7 miles is dropped. Eliminating this trail access lessens trail access on the east and northeast portion of the project area. Motorized use is all located in the northwestern portion of the project area. Passenger car access on 9457Y road only. No ATV access on 9457Y. This portion of the project area emphasizes non-motorized use rather than providing for both uses.
	Facet 2: Conflicts between Motorized and Non-Motorized Use at Iron Springs Trailhead	TH/Parking lot accesses non-motorized trails. Provides separation between motorized and non-motorized users Eliminates motorized /non-motorized trail conflicts at this location. The parking area allows residents to drive and park on National Forest System lands.
	Facet 3: Access from the community for non-street legal use	Same as Alternative D. No non-street legal ATV access to the trailhead ATV use is not allowed on 9457Y road due to non-motorized trail emphasis. Non-street legal ATV use would have to occur outside of the project area
	Facet 4: Impacts on the Iron Springs neighborhood	The elimination of access for motorized uses (ATVs) would lead to a reduction of that use, while there could be increased use from passenger vehicles, pedestrians and bicycles.
D – No Iron Springs TH with 9457Y Rd. Gated	Facet 1: Opportunities for motorized and non-motorized use.	There is no trailhead or parking area at the Iron Springs location. The 9457Y road is closed (gated) except for administrative access. No motorized access provided. .7 miles of motorized trail is dropped
	Facet 2: Conflicts between Motorized and Non-Motorized Use at Iron Springs Trailhead	Comparison is the same as Alternative C, except that all access is through gate at 9457Y Road because the trailhead and parking area is not constructed. Traffic and intrusion impacts to the residential street are increased due to inability to park on FS lands.
	Facet 3: Access from the community for non-street legal use	Same as Alternatives B and C
	Facet 4: Impacts on the Iron Springs neighborhood	Motorized access to the Forest is eliminated at Iron Springs Road. Effects are similar to Alternative B, however there is an increased likelihood of parking and trespass on private property as there will no longer be anywhere for the public to park

CHAPTER 3 - ENVIRONMENTAL CONSEQUENCES

This section summarizes the physical, biological, social and economic environments of the affected project area and the potential changes to those environments due to implementation of the alternatives. It also presents the scientific and analytical basis for comparison of alternatives presented in the Chapter Two.

Applicability of the Forest Plan, Laws, Regulations, Policies and Other Direction

Plans of Other Agencies

The Council for Environmental Quality regulations implementing the NEPA require a determination of possible conflicts between the Proposed Action and the objectives of federal, state, and local land use plans, policies, and controls for the area. The does not conflict with objectives of other Federal, State, and local land use plans, policies and Munds Park Roads and Trails project controls for the area.

Forest Plan Management Direction and Consistency

The proposed action and alternatives are consistent with the Coconino Forest Plan. This document tiers to the Final Environmental Impact Statement and Land and Resource Management Plan (Forest Plan) for the Coconino National Forest (Record of Decision, 1987) and all subsequent amendments. The Forest Plan provides direction for all resource management programs, practices, uses, and protection measures for the Coconino National Forest. The table below shows the Management Areas encompassing the project area.

Table 2: Management Areas by Acres Inclusive of the Project Area – All Alternatives

MA 3	MA 4	MA 6	MA 7	MA 9	MA 10	MA 12
4911	37	1800	321	355	15	10

Consistency with the Forest Plan applies only to the specific activities described in the alternatives. Not all desired conditions in the Forest Plan can be achieved with a single on the ground action. Often many actions (i.e. projects) are necessary in order to meet the desired conditions identified by the management direction.

The Forest Service uses many design features, mitigation measures and preventive measures in the planning and implementation of land management activities. The application of these measures begins during the planning and design phases of a project. Some are described in the Forest Plan and additional direction comes from applicable Forest Service manuals and handbooks. These are described in the Items Common to All Alternatives Section of Chapter 2.

Management guidance for management indicator species, other wildlife and fish resources, and diversity of plant and animal populations, is found in several key documents. The 1982

National Forest Management Act Regulations (Planning Regulations) at 36 CFR 219 set forth a process for developing, adopting, and revising land and resource management plans for the National Forest System (CFR 219.1), and identify requirements for integrating fish and wildlife resources in Forest Land Management Plans (CFR 219.13 and CFR 219.19). Key provisions for fish and wildlife resources require that fish and wildlife habitat be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area, where a viable population is considered to be one that has the estimated numbers and distribution of individuals to ensure its continued existence is well distributed through the planning area (CFR 219.19). By definition, the planning area is the area covered by a forest plan (CFR 219.3). The Forest Planning Regulations require that certain species, whose population changes are believed to indicate the effects of management activities, be selected and evaluated in forest planning alternatives (CFR 219.19).

To this end, Region Three Forest Service Sensitive species have been evaluated. Within the Munds Park Roads and Trails project, there are eleven species that are found or have potential habitat. Findings include “no impact” for two of these species, “may impact individuals but not likely to trend toward Federal listing” for eight species and a finding of “beneficial effects” for one species.

Additionally, the Planning Regulations require that the population trends of management indicator species (MIS) be monitored and relationships to habitat changes determined (CFR 219.19). Specific management direction for MIS is also found in Forest Service Manual (FSM) 2600. Policy and direction that tiers to CFR 219.19 is provided for MIS for application at the Forest Plan and project levels relative to species selection, habitat analysis, monitoring and evaluation, and other habitat and planning evaluation considerations, in FSM 2620. FSM 2630 provides guidance on improving MIS habitat, and conducting habitat examinations, and project level evaluations for MIS within the project area.

Within the Munds Park Roads and Trails project area, there are 16 MIS species that are found or have potential habitat. There are no habitat impacts for any of these MIS species. There are reduced human disturbance impacts to nine species. There are increased disturbance impacts to two species. All action alternatives will have beneficial affects by reducing road and trail densities. Implementation of any alternative will not result in effects that change the population’s trend on the Coconino National Forest (USDA 2002).

Applicable Laws and Regulations to All Alternatives

Shown below is a partial list of federal laws and executive orders pertaining to project-specific planning and environmental analysis on federal lands.

- Multiple-Use Sustained-Yield Act of 1960 – This law is followed by this project because it is consistent with the Forest Plan.
- National Historic Preservation Act of 1966 (as amended) – This law is followed by this project and the appropriate documentation will be located in the project file.
- Wild and Scenic Rivers Act of 1968, (as amended) – there are no wild and scenic rivers within the project area.
- National Environmental Policy Act (NEPA) of 1969 (as amended) – The effects of the project have been analyzed and are disclosed in this Environmental Assessment.

- Clean Air Act of 1970 (as amended) – There are no effects to air quality from any alternative.
- Endangered Species Act (ESA) of 1973 (as amended) – Analysis and disclosure of effects is complete, documentation meets standards of this law and consultation with U.S. Fish and Wildlife Service is underway and will be completed prior to a decision.
- Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974 (as amended) – This law is met because this project is consistent with the Forest Plan.
- National Forest Management Act (NFMA) of 1976 (as amended) – See the Forest Plan Direction and Consistency section above. This project meets the intent of this law by consistency with the Forest Plan.
- Clean Water Act of 1977 (as amended) – There is no effect to water quality.
- American Indian Religious Freedom Act of 1978 – The effects will be analyzed and disclosed in the Cultural Resources report.
- Archeological Resource Protection Act of 1980 – The effects on archaeological sites will be analyzed and disclosed in the Cultural Resources report.
- Cave Resource Protection Act of 1988 – There are no caves affected by this project.
- Executive Order 11593 (cultural resources) – See NHPA above.
- Executive Order 11988 (floodplains) – There are no floodplains within the project area.
- Executive Order 11990 (wetlands) – There is no construction within wetlands or disposition of wetlands to other ownership, nor easement through wetlands.
- Executive Order 12898 (environmental justice) – See the Environmental Justice section of this chapter.
- Executive Order 12962 (aquatic systems and recreational fisheries) – There are no aquatic systems or recreational fisheries affected within this project.
- Executive Order 13186 (conservation of migratory birds) – The effects to migratory birds will be analyzed and disclosed in Chapter 3.

Other Guidance

Where other guiding documents exist, they are specifically described for the resource where they apply; examples are the Mexican Spotted Owl Recovery Plan (1995).

Assumptions for Analysis

A portion of the Munds Roads and Trails project would be designated on existing roads and trails in the area. The estimated 1 to 3% increase in trail use within 3 to 5 years after the Munds Roads and Trails Project is completed is additive to the estimated 2 to 3 % annual

increase attributable to population increases. The cumulative effects of this increase would be small.

The project is designed to accommodate the existing use occurring on National Forest System lands around the Munds Park community as this use has led to unacceptable resource damages. It is not the intent of this project to create a destination recreation area, like the Cinder Hills OHV area northeast of Flagstaff. While the project design can and will accommodate increasing use, dramatic increases are not expected. This project changes the existing use by managing it through designating trails for motorized and non-motorized use.

All cumulative effects analyses that follow relate to the following past, present and reasonably foreseeable actions:

- Existing Forest System trail (Crystal Point trail)
- Existing Forest System roads
- Existing trailhead on Forest Road #240
- Existing social trails and unclassified roads
- Existing recreational use
- Existing Range management on the Casner/Kelly Seep and Windmill Range Allotments.
- Reasonably Foreseeable Five Arizona National Forests Cross-Country Motorized Use Project
- Reasonably Foreseeable Forest Service Nationwide Motorized Cross-Country Travel Policy

How the Alternatives Meet the Purpose and Need

Purpose and Need Statement: Plan and construct a motorized and non-motorized trail system to the standards established in the Forest Service Trails Handbook. Provide motorized, hiking, equestrian, and mountain biking opportunities. Consider street and non-street legal ATV access adjacent to the community.

Conclusion: Alternatives A, C and D all meet the need for completing a motorized and non-motorized trail system in the Munds Park/Pinewood area to Forest Service standards. Alternative B does not meet this purpose and need. Alternative A provides for both street and non-street legal ATV access adjacent to the community. Alternatives B, C, D all provide street legal ATV access adjacent to the community but not non-street legal access.

Purpose and Need Statement: Plan and manage a Forest Road system including validating or changing the road management objectives.

Conclusion: Alternatives A, C and D all meet this purpose and need statement by analyzing the existing Forest Road network in the project area and closing a number of excess or redundant roads or roads causing unnecessary or unacceptable resource damage, and as such updating and evaluating the road management objectives. Alternative B will not

meet this purpose and need statement as the existing road network and its management objectives will not be analyzed, evaluated or changed.

Purpose and Need Statement: Identify and/or construct, as needed, support features such as trailheads, parking areas, and information signing, including trail access points, to support the roads and trails system.

Conclusion: Alternatives A, B, C and D all meet this purpose and need statement to some degree. Alternatives A and C include support features including the Iron Springs trailhead, numerous Forest access points, and informational signing. Alternative D also includes these features with the exception of the trailhead off Iron Springs Road. Alternative B provides one trailhead on Forest Road 240, some parking at Janice Place, and forest access points. Alternatives A, C, and D would provide more information signing to inform and serve the residents and non-residents of a designated roads and trails system.

Purpose and Need Statement: Plan and manage a Forest Road system including validating or changing the road management objectives.

Conclusion: Alternatives A, C, and D establish a designated open road transportation system for the project area. Appendix B lists the roads and describes final management objectives for all roads in the project area, including management objective changes from the Forest Plan, roads to be obliterated, closed, converted to trail, or left open.

Road objectives and the open road system for Alternatives A and C are the same. Under Alternatives A and C there are 16 miles of open road system. Eight miles of roads will be closed or obliterated, and four miles of road are converted to trail.

Alternative D differs from Alternatives A and C as Forest Road 9457Y is changed from open road to an administrative access road only. This difference is due to the elimination of the trailhead and parking area in Alternative D and access closure at the forest boundary at Iron Springs Road.

Alternative B does not meet this purpose and need statement, as this no-action alternative does not designate an open road system and redundant roads and roads causing resource damage remain as is and unmanaged.

Purpose and Need Statement: Identify motorized and non-motorized trail routes that provide high quality recreational experiences while protecting and enhancing natural resources.

Conclusion: Alternatives A, C, and D all establish a system of motorized and non-motorized trail routes designed to Forest Service Trails Handbook guidelines. A system of trail routes designed and constructed to Forest Service trail standards will route both motorized and non-motorized trail traffic onto sustainable routes and away from areas currently heavily impacted by unauthorized trail use. These Alternatives also close, obliterate and rehabilitate some redundant or excess routes or those routes causing unacceptable resource damage meeting the purpose and need of protecting and enhancing natural resources.

Alternatives C and D do so to a lesser degree as they do not establish a connection from the motorized trail system from the Iron Springs Road area. Alternative B does not meet this purpose and need statement as this no action alternative would not identify any motorized or

non-motorized trail routes therefore failing to provide high quality recreational experiences and would allow current resource damaging motorized and non-motorized recreational uses to continue.

Purpose and Need Statement: Locate trails and roads to mitigate negative effects to threatened, endangered, and sensitive species. Strive for positive human/wildlife habitat interactions. Rehabilitate redundant trails and roads in excess to the managed system to return them to natural conditions.

Conclusion: Alternatives A, C, and D all designate a road and trail system that meets this purpose and need statement establishing well-designed sustainable trails, rehabilitating redundant roads and trails and extending protection from unmanaged recreational uses to important wildlife habitat and other vegetation and soil resources. Alternative B fails to meet this purpose and need statement, as it does not establish a designated road and trail system, and allows current resource damaging uses to continue including impacting Mexican spotted owls and their critical habitat.

Purpose and Need Statement: Establish an Order that restricts motorized use to designated routes and eliminates cross-country motorized travel.

Conclusion: Alternatives A, C and D would meet this purpose and need statement by establishing a cross-country motorized travel closure and identifying designated trail routes, while Alternative B would establish no closure or identify any designated routes.

Analysis of the Alternatives

Alternative A: Proposed Action

Direct Effects:

This alternative proposes a designated multi-use roads and trail system adjacent to the community of Munds Park. A new trailhead will be constructed to provide for roughly 10 vehicles with trailers. Eight miles of new trail construction is proposed with the majority for non-motorized use. New trail construction will consider proper location and drainage of the trail segments. An additional four miles of existing road will be converted to trail. This will have the effect of rehabilitating most of the road segment, and establishing drainage in the trail portion. Some user created trails will be incorporated into the trail system while roughly 16 miles will be rehabilitated. This will have the effect of eliminating many of the trails that are now causing soil erosion, loss of site productivity, and damaging riparian communities. Eight miles of system roads will be closed or obliterated. This action results in the improvement of roughly 15 acres of unsatisfactory soil condition.

Overall, the proposed action has the effect of repairing much of the trail related watershed damage that has occurred over many years. This action will limit the proliferation of motorized trails and manage motorized use on a sustainable trail system. The proposed motorized trail system is, however, near the upper Munds riparian community and crosses the stream network in several locations. The trail system should be designed with proper drainage structures and stream crossings. The system should also be maintained periodically and users should ride only on the designated trail system.

Indirect Effects:

Assuming that most social trails are effectively rehabilitated and that motorized users stay on designated trails, we expect a decrease in trail erosion and sediment delivery to stream channels. This should result in decreased to no adverse effect on downstream water quality.

Cumulative Effects:

Within the Munds Canyon watershed, there will be a decrease of eight miles of existing road and rehabilitation of roughly 16 miles of social trails. An additional eight miles of existing road will be converted to trail. Eight miles of designed trail will be added to the transportation network.

Although the improvements are a small portion of the overall transportation network in the watershed, rehabilitation of trails directly effecting stream channels and riparian may improve the cumulative impact of the transportation system.

Alternative B: No Action.**Direct Effects:**

Under this alternative, the existing network of unmanaged social trails and system roads will continue to exist and most likely expand in number and area. Motorized use will continue to damage riparian communities like those found in the upper reaches of Munds Canyon. Soil erosion on steeper slopes will continue and will likely increase as trails deteriorate through wear. Eight miles of new trail will not be constructed.

Indirect Effects:

It is likely that the amount of soil erosion and sediment delivery to stream channels will have a negative impact on downstream water quality.

Alternative C

The effects of Alternative C are similar to A except that all trails from the Iron Springs Trailhead would be non-motorized. This alternative will remove the motorized trail that leaves from the Iron Springs Trailhead completely, as it would be a duplicate trail to another proposed non-motorized trail.

Alternative D

This alternative is the same as Alternative A, except the Iron Springs Trailhead and parking lot is eliminated and the 9457Y road will be closed for administrative use only.

Trail maintenance and new trail construction will follow Best Management Practices and accepted trail standards as listed in the Forest Service Trails Handbook. Trails will be designed and constructed to “lay lightly” on the land, following contours and conforming to standards for slope grades for moderate multi-use non-motorized and motorized trail. By keeping trail grade slopes in accepted ranges (generally from five to 12 percent), routing the trail through appropriate soils, designing and constructing drainage structures were needed, and armoring drainage crossings, on-site and off-site erosion will be minimized and insignificant. Given that trails will be well designed and located there are no perennial

waters directly affected by any alternative trail location. There are minimal off-site erosion effects under any alternative.

Efforts should be made to encourage users to stay on the trail tread. When large numbers of users are present on the trail, some people move off the trail to allow others to pass. Sometimes bikes travel off the trail to go around hikers or horses. This occurs within about 10-20 feet either side of the existing trail tread and can contribute to erosion. Continue to observe recreation use of the trail system and correct off-trail impacts if they occur. The trail can be widened in appropriate locations to allow for users to pass each other and to reduce off trail use.

Analysis of Significant Issues

The following section describes environmental effects as they relate to the significant issue and its facets. Information is organized into 1) affected environment, 2) direct and indirect effects and 3) cumulative effects.

Issue: The development of a trailhead off Iron Springs Road to serve the proposed motorized and non-motorized trail system would lead to negative impacts on the adjacent neighborhood.

Affected Environment

From the Forest boundary at the end of Iron Springs Road a poor condition Forest Service road, 9457Y, leads into the Forest. This road is currently used predominately by local residents of Munds Park to access National Forest System lands for both motorized and non-motorized recreational opportunities. Both user-created foot trails and ATV trails have been mapped leading away from this area. A smaller number of Forest visitors drive full-sized passenger vehicles on this rough and rocky road to access the Forest.

There are currently no designated Forest Service trails in the area of Iron Springs Road and Forest Road 9457Y, yet there is heavy use of the National Forest from this location. As a result of this use, the 9457Y road is in poor condition and the multiple trails leading from the Forest Boundary have lead to a loss of vegetative cover and some soil erosion. Residents of the Iron Springs Road area undoubtedly see a number of people traveling down the adjacent residential streets both on foot, on ATVs and passenger vehicles to access the Forest from this location.

There is currently no established parking area on National Forest System lands adjacent to Iron Springs Road which causes Forest visitors to park off road 9457Y or to park on residential streets off the Forest. The nearest established Forest Service trailhead and parking lot is off Forest Road 240. While the current use of the Forest adjacent to Iron Springs Road is largely from local residents, the trailhead off the major arterial, Forest Road 240, sees a mix of local residents and some visitors from outside the Munds Park area. The use of the Forest Road 240 Trailhead by visitors from outside the general project area occurs largely in the winter, during snowmobile season.

Alternatives A and C include the establishment of a trailhead and parking area off FR 9457Y, the Forest Road extending from Iron Springs Road. The road would be improved to the

trailhead and then be obliterated and rehabilitated beyond. The trailhead would be located approximately ¼ mile from the Forest boundary and out of sight and sound of most private residences.

Under Alternative A both motorized and non-motorized trails would lead from the trailhead. As such, both street-legal ATVs and non street-legal ATVs hauled by truck or trailer would be able to access the trail system from this point. Street legal ATVs could use 9457Y road to access the trailhead.

Alternative C would not provide Forest access for motorized uses and no motorized trails would leave from the trailhead. Motorized access to the trailhead would be restricted to passenger vehicles only. ATV access would not be allowed on Forest Road 9457Y.

Alternative D would also eliminate all motorized Forest access in the Iron Springs area and also not construct the trailhead and parking lot. A gate would be installed at the Forest boundary adjacent to private lands.

Alternative B would allow current unmanaged motorized and non-motorized uses to continue in the Iron Springs area establishing no trailhead or trail system but continuing to allow cross-country motorized travel. When the ID team designed the proposed action, it was felt that providing a combination of motorized and non-motorized uses would best meet the needs of the community given the nature of the existing use of the Forest and results of the survey conducted by NAU and the MUTS group.

Direct and Indirect Effects:

Impacts on residential streets: Alternatives A and C, with the establishment of a trailhead off Iron Springs could cause increases in traffic on residential streets off the National Forest including on Iron Springs Road as Forest visitors make use of the improvements to Forest Road 9457Y and the trailhead facilities. It is unlikely that such a facility would draw much use from visitors from outside Munds Park, as it is located in the heart of the community well off main arterials and streets. It is, however, a centrally located access point for local residents.

Under Alternative C, no motorized trails would extend from the trailhead and access to the forest on FR 9457Y would be restricted to passenger vehicles. As ATV access would be restricted, there would be a reduction in the number of ATVs and passenger vehicles towing ATVs from Iron Springs Road onto the Forest, than under Alternative A with its inclusion of motorized trails from the trailhead and Alternative B, which would allow this existing use to continue.

Under Alternative D, FR 9457Y would be closed to public use at the Forest Boundary (the cattle guard at the end of Iron Springs Road). This alternative has the potential to provide the least impact on the adjacent neighborhood by not providing parking on National Forest System lands. This assumes that access would occur primarily from residents walking or biking to the gate and entering trails and because access is for non-motorized use, impacts from noise and traffic would be less. However, if residents want to drive and park, then the impacts of parking on residential streets could impact those residents at this forest access point.

Under Alternatives A, C, and D, a multi-use access point is proposed for Janice Place as well. Impacts from parking on Janice place can be seen as similar under the action alternatives

which would implement some simple improvements to the parking there, and extend a prohibition on the parking of vehicles towing trailers. This is likely to limit the popularity of the Janice Place access for Forest visitors from outside the community preventing notable increases in motorized use of the access point and associated trail system.

As this access would then serve street-legal ATVs and prohibit parking by vehicles towing trailers, there would be no legal access for non street-legal ATVs from Janice Place. Impacts on the Janice Place neighborhood would then be similar under all alternatives. Relocating the trail and obliterating the trail immediately adjacent to a couple residences will have less impact than Alternative B.

Under Alternative B, current use would be allowed to continue, including the poorly located and heavily used motorized trail that runs adjacent to private property leading to negative impacts by dust and noise to nearby homeowners. This alternative would have the most negative impacts because there is no designated trail system that is designed and managed to minimize or mitigate impacts on the adjacent neighborhood.

Alternatives A, C and D would eliminate this trail and replace it with a designed, sustainable system trail largely out of sight of most residences.

Cumulative Effects:

The cumulative effects of Alternatives A, C and D can be seen as similar and few. Alternatives A, C and D propose a trail system with slight variations in access and mileage of motorized versus non-motorized trails designed to accommodate the existing use and normal, reasonably foreseeable use increases. The designation, design and construction of trails is an activity the Forest Service has been undertaking since its inception and is by no means a unique action with unknown implications. While motorized trail use is a relatively recent use type to appear on National Forest System lands its effects are also by no means unique with unknown implications. National Forest System lands have seen the impacts of both unmanaged and managed motorized use over approximately a 20-year period. As such the Forest Service has the proven ability to design, construct and manage motorized trail systems in such ways that limit or mitigate the impacts of these motorized uses.

There are slight differences between Alternatives A, C and D in terms of cumulative effects, however. Under Alternatives C and D, there is a direct reduction of access for non-street legal ATV users, which carries indirect effects on the community and this user group. In addition, this use is likely to be displaced to other locations outside the project area where cross-country travel closures are not being proposed in this action. The displacement of ATV use to other locations would have similar effects in those locations, as the no action alternative (Alternative B) would allow use to continue in the project area.

Threatened or Endangered Species

Mexican Spotted Owl

The Crystal Point Trail includes the designation of an existing user created trail to a system trail. Approximately 1 ¼ mile of that trail is within the Casner Protected Activity Center (PAC). The Crystal Point Trail will improve conditions in and around the Casner PAC by managing recreation use in the area. Social trails within the PAC will be obliterated. Impacts from Forest visitors in the more sensitive areas of the PAC will be greatly reduced or

eliminated. This affords protection to the threatened Mexican spotted owl and its critical habitat. There is a management need for a new trail as it provides more benefits to the MSO than having unmanaged recreation use in the area. Unmanaged recreation use will have negative impacts to wildlife and wildlife habitat.

Human use of the Crystal Point Trail loop trail may provide a source of auditory and visual disturbances within the Casner PAC. Munds Park residents primarily use this trail and recreation activities are expected to be of low intensity. Human use of this trail at nighttime, dawn and dusk is expected to be very light, and MSO are not expected to measurably change their foraging behavior. Camping along this portion of the trail will be prohibited. All alternatives will decrease impacts from recreation use near or within three PACs. No new roads other than the continuation of Crystal Point Trail are proposed within the PACs.

Table 3: Miles of Activities in MSO habitat by Alternative

Miles of activities in MSO habitat by Alternative	Casner PAC 040536	Frog Tank PAC 040550	Coyote Park PAC 040525	Restricted Habitat	Critical Habitat (Outside of PACs)
Obliteration of User-created Trails	.97	0	2.35	9.33	6.44
Obliteration/Closure of Roads	.95	1.40	.66	4.71	4.42
Road to Trail Conversion	NA	NA	NA	1.76	1.57
Trail Construction Non-motorized	1.24	NA	NA	3.34	1.05
Trail Construction Motorized	NA	NA	NA	.29 in C&D .84 in A	0 in C&D .66 in A

Bald Eagle

In all alternatives there will be a non-motorized trail constructed within bald eagle foraging habitat, at O’Dell Lake. The loop portion of the trail will be for hiking only for .7 miles. No mechanized equipment, such as mountain bikes, will be allowed on the loop to minimize disturbance to adjacent wildlife. This is a winter foraging site and not known to be used during the summer. Foraging bald eagles may be directly affected by people using the trail in the winter months. These activities would cause auditory and /or visual disturbances to foraging eagles. These disturbances would be short-term and of low intensity, and will not affect the overall distribution of bald eagles.

Forest Service Region Three Sensitive Species

Species that are known to occur or have potential habitat along the alternative trail routes are listed in the table below. No alternative will result in a trend toward federal listing or loss of viability. Effects on Region Three Forest Service Sensitive Species are listed below in Table 4.

Table 4: Forest Service Region Three Sensitive Species

SPECIES NAME	DETERMINATION	WHY
American Peregrine Falcon	“No impact”	Nearest nest location over 6 miles from the area. Foraging habitat up to 20 miles from nest. No key foraging impacted.
Northern Goshawk	“Beneficial impact”	All Action alternatives close roads and trails within the PFA and limit access to nest stands. Overall foraging habitat will improve.
Northern Leopard Frog	“No impact”	No effects are expected for any alternative to habitat from the designated trail system.
Mountain Silverspot Butterfly Blue-black Silverspot Butterfly Early Elfin	“May impact individuals, but not likely to result in trend toward federal listing or loss of viability”	No direct effects are expected for any alternative. Indirect effects are from trail construction by disturbing or removing understory vegetation, in effect reducing food available to adult butterflies and moths. In contrast, reducing impacts in and at edge of meadows, and obliterating roads and social trails would be beneficial for these species.
Plants: Arizona sneezeweed, Flagstaff beardtongue, Rusby’s milkvetch, and Flagstaff penstemon	“May impact individuals, but not likely to result in trend toward federal listing or loss of viability ”	Trail location will be surveyed prior to or along with construction and obliteration so these plants will be avoided. Soil and vegetation disturbance during trail construction/obliteration may impact potential habitat. Individual plants along portions of existing trail may be trampled although trail edges provide habitat.
Navajo Mountain Mexican Vole	“May impact individuals, but not likely to result in trend toward federal listing or loss of viability”	Suitable habitat. Soil and vegetation disturbance during trail construction may impact runways and potential habitat. Social trail/road closure and obliteration would improve habitat.

Management Indicator Species

A working draft forest-wide assessment entitled "*Management Indicator Species Status Report for the Coconino National Forest*" dated 7/1/02 summarizes current knowledge of

population and habitat trends for species identified as management indicator species (MIS) for the Coconino National Forest (USDA Forest Service, 2002a). Population trends need to be monitored as the Forest Plan is implemented, and relationships to habitat changes over time determined (36 CFR 219.19). Table 5 below lists MIS for the project and impacts. No alternative will impact population trends of MIS.

Table 5: Management Indicator Species

MA	MIS	HABITAT SPECIFICS	IMPACTS
3,4	Northern Goshawk	Occupied nesting habitat in all alternatives.	Beneficial impacts to nesting areas in Alt. A, C and D.
3,4	Pygmy Nuthatch	Snag dependant, secondary nester, prefers large yellow pine. Social species.	No habitat impacts. No trees greater than 9” diameter are cut. Potential human disturbance along trail zone of influence.
3,4	Turkey	Summer habitat present in all alternatives	Beneficial impacts in key habitat due to road/trail closure and obliteration. No roost habitat impacts. No trees greater than 9” diameter cut.
3,4	Red Squirrel	Mixed conifer dependant species.	No habitat impacts.
3,4	Mexican Spotted Owl	PAC habitat in Alt. A, C and D. Trail passes through one designated PAC.	Disturbance to one PAC from Crystal Point trail in Alt. A, C, and D. Beneficial affects from road and trail obliteration in protected and restricted habitats.
3,4, 6,7, 9	Elk	No key reproductive areas identified	Overall reduced disturbance and improved vegetation.
3,4, 6	Abert Squirrel	Pole-sized ponderosa pine.	No habitat impacts. No trees greater than 9” diameter are cut.
3,4, 6	Hairy Woodpecker	Snag dependent, primary cavity excavator/nester.	No habitat impacts. No trees or snags greater than 9” diameter are cut.
9, 10	Antelope	Found in grasslands. No key antelope areas identified.	No impacts.
7	Juniper Titmouse	Found in pinyon-juniper woodland. Secondary cavity nesters prefer juniper trees.	No habitat impacts. No large juniper trees or snags will be cut.
6,7	Mule Deer	No key reproductive or summer	No habitat impacts. Overall

MA	MIS	HABITAT SPECIFICS	IMPACTS
		habitat identified.	reduced disturbance.
12	Cinnamon Teal	Potential nesting habitat at Odell Lake.	Disturbance from dogs off leash on O'Dell Lake loop trail.
12	Lincoln's Sparrow	Found in bogs, wet meadows, riparian thickets, shrubby forest edges, marshes and brushy fields	No habitat impacts. Potential disturbance from trail use.
12	Yellow-breasted Chat	Found in low elevation riparian deciduous forest.	No impacts.
12	Lucy's Warbler	Found in low elevation (<7,000) riparian forest. No habitat in project.	No impacts
12	Macroinvertebrates (aquatic)	Found in fresh water environments	No impacts

Migratory Bird Species

President Clinton signed Executive Order 13186 on January 10, 2001, placing emphasis on conservation of migratory birds. This order requires that an analysis be made on the effects of Forest Service actions on Species of Concern listed by Partners in Flight, the effects on Important Bird Areas (IBA's) identified by Partners in Flight (Latta, et al., 1999), and the effects to important overwintering areas. There are no IBA's within the alternative trail routes.

There is limited information regarding songbird's tolerance to human disturbance. In general, a simplification of bird communities occurs along recreational trails with generalist species more abundant near trails and specialists less common. Animals that feed in social groups (pinyon jay, pygmy nuthatch) are thought to respond quicker to disturbance than solitary ones because of increased vigilance and the past experiences of other individual birds in the groups (Knight and Cole 1995). Miller *et al* (1998) found the majority of species were found in reduced numbers near trails, the zone of influence of trails appears to be about 240 feet. Certain species, exhibited reduced numbers as far as 320 feet away from trails. By designating trails and rehabilitating and restoring social (non-designated) trails, there is a short and long-term benefit by reducing the zone of influence in some locations. Prohibiting cross-country motorized travel will also benefit species by providing more areas of undisturbed habitat.

Miller also maintains that consolidation of trails to certain areas (i.e. edges of forest and grassland) will reduce the fragmentation of large blocks of habitat, maintaining less-disturbed areas for species sensitive to fragmentation. New trail construction is designed to consolidate dispersed use and reduce fragmentation.

Habitat Fragmentation

Affected Environment

Analysis of Forest Service Geographic Information System (GIS) data on the area shows evidence of numerous user created roads and a proliferation of user created social trails.

Direct and Indirect Effects:

While new trail construction, under Alternatives A, C and D would lead to additional habitat fragmentation, these effects are mitigated by the closure and obliteration of intersecting social and system trails and roads.

Under Alternatives A and C and D, the construction or designation of trails will add some fragmentation to an already fragmented area. Construction and designation of the roads and trails system is tied to social and system trail closure and obliteration is expected to reduce habitat fragmentation, by collecting use to designated trail alignments. Many people tend to stay on established trails so the amount of social trail use may lessen. (Dawson and Hendee 2002).

Alternatives C and D slightly lessens fragmentation due to the elimination of one motorized connector trail.

All action alternatives prohibit cross country motorized travel thereby reducing the creation of motorized trails. If new motorized trails are created since they are not designated trails, they will be obliterated.

Alternative B will allow current unmanaged use to continue and with it, increasing habitat fragmentation.

Analysis of Other Aspects of the Environment

Where the Munds Park Roads and Trails project would be designated primarily on existing Forest Service system roads and trails, there are no direct effects to plants, or recreation experience beyond current effects from their use, as these routes would be upgraded to Forest Service standards. The construction of new trail would be conducted to Forest Service trail construction standards and as such would have no direct effects on plants. The recreation experience would only be affected in the short term, during construction activities, and would not present a significant direct effect.

Air Quality

There is no effect to air quality from any alternative. There is no effect to the existing forest structure, types of trees or tree densities from any alternative. There is no change in the likelihood of fires.

Plants

Direct and Indirect Effects

There is a slight direct effect to plants where the 24-52-inch tread for the trail is constructed. The trail will remove a linear corridor of plant material from the area, but this will not affect

the overall condition of the Forest understory in the area. Trail design includes avoidance of sensitive plant locations so there is little effect from the trail to these species.

Trail design includes identification of any non-native or invasive weed species that may exist and actions to prevent spread and/or eradicate the plants. Trailheads will be monitored annually to see if recreation users have transported non-native or invasive plants from other areas to the trailheads. There are few known populations of non-native or invasive plants along any of the alternative routes. No alternative is expected to increase non-native and invasive weed species in the trail route areas.

Cumulative Effects

The effects to the understory plant community along the alternative trail routes is additive to effects from other vegetative treatments. The cumulative effects from the Munds Park Roads and Trail project are not significant. The same measures of control and eradication of nonnative and invasive plant species will be undertaken for the Munds vegetation projects.

Soil and Water Quality

Affected Environment

The project area is located almost entirely within the Oak Creek watershed. Oak Creek is a state designated Unique Water, and as such, is regulated by very stringent water quality standards including low levels of turbidity. Over time, a disturbing number of unplanned motorized and non-motorized trails have developed around the Munds Park community. Many of these trails are located within and adjacent to many of the roughly 26 miles of stream channel within the project area or on steep slopes. These user-created, social trails generally lack effective drainage to reduce soil erosion and, in many cases, lead to substantially increased sediment delivery to stream channels. Current inventory shows that there are roughly 16 miles of non-motorized social trail and 14 miles of motorized social trail in the project area. The numbers are likely to be higher as social trails continue to be created.

Some Forest system roads have degraded to the point that the original drainage structures are destroyed and the road surface tends to channel water resulting in extensive surface erosion. There are roughly 24 miles of system road within the project area.

Table 5 displays the soils within the project area. The map units referred to in the table are from Coconino National Forest Terrestrial Ecosystem Survey. Most soils are derived from basalt and are rocky or skeletal in nature. With the high clay content in all soils, bearing strength is weak when soils are wet. Severe erosion hazard is generally due to steeper slopes.

Erosion Hazard is predicted on the basis of relative susceptibility of the soil to erosion upon removal of vegetation and litter.

A slight rating indicates that all vegetative groundcover (vegetation basal area and litter) could be removed from the site and resulting soil loss will not exceed Tolerance soil loss rates. This does not imply that site degradation is not occurring. Removal of the organic matter source (natural vegetation) will lead to undesirable changes in soil chemical and physical properties. Areas rated within a slight erosion hazard class generally stabilize under natural conditions.

A moderate rating indicates that predicted rates of soil loss will result in a reduction of site productivity if left unchecked. Conditions are such that reasonable and economically feasible mitigation measures can be applied to reduce or eliminate soil loss.

A severe rating indicates that predicted rates of soil loss have a high probability of reducing site productivity before mitigating measures can be applied.

Table 5: Soil Erosion Hazard

Map Unit	Acres	Erosion Hazard
430	75	Moderate
492	288	Moderate
520	161	slight
530	189	Moderate
55	155	slight
575	116	severe
578	22	slight
579	2327	slight
582	806	slight
584	1793	severe
585	1498	slight
586	60	slight

575: This component has a severe erosion hazard. Maintenance of vegetative groundcover is essential to prevent sheet and rill erosion. Soils are above the angle of repose. Tree roots play a major role toward stabilizing these slopes. Removal of trees should be selective with minimum exposure of mineral soil. Steep slopes, surface rock fragments and rock outcrop limit most management activities.

584: These soils are subject to trafficability problems and soil damage (compaction, puddling and displacement) when wet. These problems can be mitigated or avoided by restricting ground disturbing activities to periods when the soils are dry. This component has a severe erosion hazard. Maintenance of vegetative groundcover is essential to prevent sheet and rill erosion. Surface rock fragments are variable and may restrict certain management activities.

There is a slight potential that trail construction could occur in one of these more sensitive soil types, although they will always be avoided when possible. However, if avoidance is not possible for any trail segment, then if trail maintenance and new trail construction follow

Best Management Practices and accepted trail standards as listed in the Forest Service Trails Handbook, trails on these soil types can be tolerated with little to no impact. All trails, regardless of the soil type, will be designed and constructed to “lay lightly” on the land, following contours and conforming to standards for slope grades for moderate multi-use non-motorized and motorized trail. By keeping trail grade slopes in accepted ranges (generally from 5 to 12 percent), routing the trail through appropriate soils, designing and constructing drainage structures where needed, and armoring drainage crossings, on-site and off-site erosion will be minimized and insignificant.

Recreation Experience

Affected Environment:

The type of experience a person has while recreating on National Forest trails varies based on the personal observations and expectations of each person. However a high quality recreation experience can generally be described as follows:

- The diversity of vegetation
- The number and quality of vistas/viewpoints
- The number and quality of geographic or natural features
- Freedom from the sights and sounds of buildings and highways
- The naturalness of the landscape and evidence of manipulation by humans
- The number of encounters with others
- Many people appreciate an easy to find trail that prevents getting lost
- The challenge of traveling in a wildland environment

These experiential qualities sought by hikers, mountain bikers, and equestrians are often the same as those sought by ATV and motorcycle riders. Many of these items are described in the Recreation Opportunity Spectrum setting⁴ for the area. Currently the trail routes pass through a combination of Roded Natural, Semi-primitive Non-motorized and Semi-primitive Motorized Recreation Opportunity Spectrum settings.

Currently recreational trail use consists of a combination one Forest system foot, horse, and mountain bike trail, and social (user-created) motorized and non-motorized trails, rough two-track roads and also a limited amount of cross-country travel.

Direct and Indirect Effects:

Vistas and Viewpoints – The most viewpoints and vistas can be found along the existing Crystal Point trail which will remain open to non-motorized uses under all Alternatives including Alternative B, the no action alternative. The nature of much of the terrain in the project area does not provide many vistas and viewpoints. Alternatives A, C and D call for an extension of the Crystal Point Trail making a loop down to O’Dell Lake. There will be additional opportunity for vistas and views along this proposed route.

Geographic and Natural Features - Opportunities are similar under all the action alternatives as trails pass through stands of ponderosa pine, interspersed with open meadows, and cut by

⁴ The Forest Service uses the Recreation Opportunity Spectrum (ROS) categories as a tool to describe forest settings.

shallow and rocky drainages. All of the action alternatives include the loop trail at O'Dell Lake providing an outstanding opportunity to interpret this unique natural feature and wildlife habitat on the urban interface.

Sights and Sounds of Buildings and Highways – Despite the fact Interstate 17 passes through the project area much of the proposed trail system under the action alternatives is out of both sight and sound of this highway. The trails south of I-17 in the action alternatives would pass through an area adjacent to the highway, but provide trail access to residents in this area and the opportunity to connect to the trail system that leads away from the highway.

The trail system under the Alternatives A, C, and D is designed to collect both motorized and non-motorized use and route it away from both residential streets and private residences quickly to access the forest. A feature of the Munds Park community surely important to its residents is its rural and quiet character. By providing ready and easy access to the Forest and routing trail use out and away from the community on to the Forest will serve two objectives in this regard: quickly separating trail use away from the sights and sounds of the residential area and also quickly separating the sight and sound of trail use away from the relatively quiet residential area.

The Naturalness of the Landscape and Evidence of Alterations by Humans – Evidence of human use of the landscape is evident among all Alternatives. The Forest surrounding the community is marked by heavy social trail use, and evidences of uses common in urban interface areas like children's forts, and illegal dumping. Alternatives A, C, and D provide opportunities to manage currently unmanaged use rehabilitating impacted areas, and routing new trails in such a manner that limits impacts to natural resources. Alternative B continues alterations through unmanaged use that will continue to reduce the naturalness of the forest area.

The Number and Frequency of Encounters with Others – The number and frequency of encounters is similar for all the alternatives including the no action alternative. The frequency of encounters and type of encounters can have a significant impact on the quality of a recreational trail experience. Non-motorized users often suffer negative impacts on their experience after encounters with motorized users. Mountain bikes can have negative impacts on equestrian users. While trail use levels in the Flagstaff area are expected to increase at a similar rate as the population of the area increases, approximately 4 to 5% a year, increases in the Munds Park area are expected to be less. The Munds Park community is essentially "built out" with little opportunity for expansion or growth. Thus, increases in trail use on the Forest in the project area are likely to be 1 to 3% annually. Designation and construction of new trail is unlikely to lead to significant increases in use.

The duration of encounters on the trail system under Alternatives A, C, and D would be primarily of short duration. In the urban interface these encounters would be more frequent on weekends and on weekday evenings, when usage peaks.

Under Alternatives C and D the frequency of encounters between non-motorized and motorized users would be reduced due the differences proposed for the Iron Springs Area.

Under Alternative A, the proposed action, motorized and non-motorized users would share the trailhead off Iron Springs leading to interactions both at the trailhead and on the multi-use motorized trails. With the exclusion of motorized access from the Iron Springs trailhead

motorized and non-motorized encounters would be reduced with the exception of those between non-motorized users leaving from the trailhead and connecting to multi-use trails in the vicinity of Janice Place.

The situation would be similar under Alternative D as there would also be no motorized trail access from Iron Springs reducing encounters in that area, leaving only those encounters opportunities on the motorized multi-use trail system.

Designated Forest Service Trail Versus Social Trail Experiences – There is a discernable difference between recreational experiences on designated, engineered and maintained Forest Service system trails and social, user-created trails. While trail planners strive to design and construct trails that seem to have “just happened” and that blend into their environment, this requires much thought and care. As such, a well-designed and constructed trail will guide the users through the environment subtly and in such a manner that resource impacts are minimized and the final product is a sustainable trail that best meets the needs of the intended user group(s). Social, user-created trails, however, are most often not designed or planned, but rather just occur from repeated use. As such, their route often follows drainages, contains steep grades and has little or no erosion control structures. These routes can be circuitous and tend to have many spurs and side trails. In addition, social trails are often located with little regard to cultural or biological considerations. The experience of a Forest Service system trail can be seen as not only a more positive and satisfactory experience for most users, but safer and less impactfull as well.

Public Health and Safety

Trails in general do not pose a public health and safety concern. Alternatives C and D remove motorized use from the Iron Springs area and thereby reduce concerns that emanate from combined motorized and non-motorized use. In other similar projects there have been concerns raised that the location of trails adjacent to private property could lead to an increase in vandalism, theft and other crimes. However, trail research indicates that very little, if any, vandalism or property damage is associated with trails located near private property. In fact, several studies indicated that trails near private property actually provide greater benefits (Morris and Tracy, 1998; Colorado State Parks, 1995; Murphy, 1992).

There were concerns raised regarding the public health and safety from increased ATV and motor vehicle traffic on Iron Springs Road if a trailhead is designated and constructed there (under Alternatives A and C). While the trail system was designed to accommodate the existing use in the Munds Park area and account for common and expected subtle increases in use, there may be some increase from outside residents.

Alternative A, with its trailhead off Iron Springs for both motorized and non-motorized trails would possibly lead to the most traffic in the Iron Springs area. This can be considered, however, an improvement on Alternative B, the no action alternative, which would allow existing traffic to continue. Alternative A provides access for non street-legal ATVs, which could be trailered to the trailhead, as an alternative to some illegal use of Iron Springs Road and other community streets.

Alternatives C and D would remove motorized access from the Iron Springs area and in turn reduce motorized traffic emanating from the Forest in that area.

Alternative D, however, may lead to increased parking on Iron Springs Road as FR 9457Y from Iron Springs would be closed eliminating any parking on the forest.

This project is proposed for 7,500 acres of National Forest System lands around the community of Munds Park. While there may be some effects to private lands adjacent to the Forest, the enforcement of state and local laws on those private lands is outside the jurisdiction of the U.S. Forest Service. We feel this project will serve to improve public health and safety conditions both on the Forest and off the Forest, but the enforcement of pertinent laws and regulations, like state of Arizona laws governing ATV use cannot be enforced by the Forest Service off National Forest System Lands.

Environmental Justice

The issue of environmental equity and justice in natural resource allocation and decision-making is receiving increasing political and social attention. Following President Clinton's Executive Order 12898 (Federal Register, February 1994) all Federal land management agencies have been mandated to address environmental justice in minority and/or low-income populations, with the goal of achieving environmental protection for all communities regardless of their racial and economic composition.

Alternatives A, B, C, and D do not result in disproportionate impacts to low-income populations, nor do they impact minority populations.

CHAPTER FOUR - CONSULTATION AND COORDINATION

The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this environmental assessment:

Interdisciplinary Team Members:

Andrew K. Johnson, Recreation Planner	Alvin Brown, Interdisciplinary Team Leader
Brian Poturalski, Recreation Planner	Cary Thompson, Wildlife Biologist
John L. Nelson, Recreation Staff Officer	Paul Standing, Roads Engineer
Frank Thomas, Resource Information Specialist	Dave Gifford, Archaeologist
Jeff Hink, Watershed Specialist	Mark Camisa, Law Enforcement Officer

Federal, State and local Agencies:

U.S. Fish and Wildlife Service	Arizona Department of Game and Fish
Coconino County	Arizona State Historic Preservation Office
Arizona State Parks	

Native American Tribes – through the January 2003 Annual Consultation Letter:

Dine' Medicine Man's Association	Hualapai Tribe
Fort McDowell Yavapai Nation	Havasupai Tribe
Hopi Tribe	Navajo Nation
Pueblo of Acoma	Pueblo of Zuni
San Carlos Apache Tribe	San Juan Southern Paiute Tribe
Tonto Apache Tribe	Yavapai-Apache Nation
Yavapai-Prescott Tribe	White Mountain Apache Tribe

Others:

Arizona Trail Association	400+ Homeowners in Munds Park/Pinewood
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CHAPTER FIVE – REFERENCES AND LITERATURE CITED

- Arizona Game and Fish Department. 2001. Regional Elk Operational Plan. December 3, 2001. 40pp. www.azgf.com.
- Block, William M.; Finch, Deborah M., technical editors. 1997. Songbird ecology in southwestern ponderosa pine forests: a literature review. Gen. Tech. Rep. RM-GTR-292. Fort Collins, CO; U.S. Department of Agriculture, Forest Service, Rocky Mountain Forest and Range Experiment Station. 152p.
- Brody, A.J., and M.R. Pelton. 1989. Effects of roads on black bear movements in western North Carolina. *Wildl. Soc. Bull.* 17:5-10.
- Claar, J.J., N. Anderson, D. Boyd, M. Cherry, B. Conrad, R. Hompesch, S. Miller, G. Olsen, H. Ihsle Pac, J. Waller, T. Wittenger, H. Youmans. 1999. Carnivores. Pages 7.1 –7.63. in Joslin, G., and H. Youmans, coordinators. 1999. Effects of Recreation on Rocky Mountain Wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife. Montana Chapter of the Wildlife Society. 307pp.
- Colorado State Parks, State Trails Program, 1995. The Effect of Greenways on Property Values and Public Safety.
- Dawson, Chad P. and John C. Hendee. 2002. Wilderness Management, Stewardship and Protection of Resources and Values, 3rd Edition. Fulcrum Publishing. 444-445pp.
- Hamann, B., H. Johnston, P. McClelland, S. Johnson, L. Kelly and J. Gobielle. 1999. Birds. Pages 3.1-3.34 in Joslin, G., and H. Youmans, coordinators. 1999. Effects of Recreation on Rocky Mountain Wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife. Montana Chapter of the Wildlife Society. 307pp.
- Holmes, T.L., R.L. Knight, L. Stegall, and G.R. Craig. 1993. Responses of wintering grassland raptors to human disturbance. *Wildl. Soc. Bull.* 21:461-468.
- Joslin, G., and H. Youmans, coordinators. 1999. Effects of Recreation on Rocky Mountain Wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife. Montana Chapter of the Wildlife Society. 307pp.
- Knight, R.L. and D.N. Cole. 1995. Factors that Influence Wildlife Responses to Recreationists. Pages 71-79 in R.L. Knight and K.J. Gutzwiller, eds. *Wildlife and recreationists: coexistence through research and management*. Island Press, Covelo, Calif. 372 pp.
- Knight, R.L., and S.A. Temple. 1995. Wildlife and recreatonists: coexistence through management. Pages 327-333 in R.L. Knight and K.J. Gutzwiller, eds. *Wildlife and recreationists: coexistence through research and management*. Island Press, Covelo, Calif. 372 pp.
- Latta, M.J., C.J. Beardmore, and T.E. Corman. 1999. Arizona Partners in Flight Bird Conservation Plan. Version 1.0. Nongame and Endangered Wildlife Program Technical Report 142. Arizona Game and Fish Department, Phoenix, AZ. 331pp.

- Lindezey, J.S. 1967. Highlights of Management. Pages 245-259 in O.H. Hewitt, ed.. The wild turkey and its management. The Wildlife Society, Washington, D.C.
- Miller, Scott G., Richard L. Knight, and Clinton K. Miller. 1998. Influence of recreational trails on breeding bird communities. *Ecol. Appl.* 8(1), 162-169.
- Miller, S. G. 1999. Environmental Impacts: The Dark Side of Outdoor Recreation. The Quivera Coalition. Vol. 2 No. 4.
- Morris, Hugh, and Tammy Tracy, January 1998. Rail-Trails and Safe Communities.
- Murphy, Michelle Miller, 1992. The Impact of the Brush Creek Trail on Property Values and Crime. Sonoma State University.
- USDA Forest Service 1999. Fort Valley Ecosystem Restoration Project. On file at the Peaks Ranger Station.
- USDA Forest Service. Southwest Region. 2002. Management Indicator Species Report for the Coconino National Forest. Working Draft. Unpublished report. 82pp.
- USDA Forest Service. 1987. Coconino National Forest Land and Resource Management Plan.
- USDI Fish and Wildlife Service. 1995. Recovery Plan for the Mexican Spotted Owl. Albuquerque, NM. 172pp.
- Wright, G. A., and D. W. Speake. 1975. Compatibility of the eastern wild turkey with recreational activities at Land Between the Lakes. Kentucky. Proc. Annu. Conf. Southeast Assoc. Game Fish Comm. 29:578-584.

APPENDIX A – RESPONSE TO COMMENTS

Comments to the Proposed Action, Detailed Response Summary

Introduction:

On July 11, 2003 many of you received and were asked to respond to a Proposed Action for the Munds Park Roads and Trails Project. We received a tremendous response to that request. In addition to the mailing, we received additional comment at a well-attended public meeting held on August 2, 2003. The Interdisciplinary Team has worked to address concerns and suggestions raised in those comments in this response. In addition a letter that addressed some of the major concerns raised in comments and clarified some aspects of the Proposed Action was mailed on February 26, 2004 to those who had commented previously. This letter also provided an opportunity for concerned individuals to provide additional comment after considering the information in the letter. All responses to the February 26 letter were also analyzed and considered. Our analysis found that these comments were additive to comments already received and often restated previous concerns and/or suggestions.

We received 273 comments to the Proposed Action and 12 additional comments to the February 26, 2004 letter. Comments to the February letter have been incorporated into this response summary, as no new categories were needed. Many of the comments are on the same topic and have like or similar themes. For brevity and to reduce repetition, we have identified 14 major groups and 64 sub-topics to respond to the comments. Note that many comment responses are followed by an update in bold text that notes where these comments were addressed in the Environmental Assessment. Table 6 displays these groups and subgroups and identifies how many comments were associated with them to give you an idea of the degree of interest for each topic.

Table 6: Summary of Comment Groups

Summary of Groups		
Iron Springs Trailhead	6 Sub-Topics	70 Comments
Janice Place Trailhead	6 Sub-Topics	19 Comments
I-17/Willard Springs Trailhead	3 Sub-Topics	17 Comments
Munds/I-17 Rest Area Trailhead	1 Sub-Topic	10 Comments
Enforcement	4 Sub-Topics	21 Comments
Environmental Impacts	4 Sub-Topics	17 Comments
Community Impacts	5 Sub-Topics	40 Comments
Agreement Comments	1 Sub-Topic	24 Comments
Specific Road/Trails/Access	18 Sub-Topics	32 Comments
Call for No-Action Alternative	3 Sub-Topics	16 Comments
Disagreement with MUTS	1 Sub-Topic	5 Comments
Munds Survey	2 Sub-Topics	4 Comments
Spending Federal Dollars	1 Sub-Topic	10 Comments
Miscellaneous Comments	10 Sub-Topics	10 Comments
TOTALS		
14 GROUPS	65 Sub-Topics	285 Individual responses

Comment Group: Iron Springs Trailhead

The proposed Iron Springs Trailhead and parking area received by far the greatest amount of comment. This particular concern is by and large the biggest issue with the Proposed Action, and in fact, the majority of comments relate to this issue in some form. We received 70 comments on this specific action, including a petition with more than 270 names signed. Due to the controversy of this part of the Proposed Action we will consider alternatives that modify the Iron Springs trailhead proposal. Other options have been suggested in relation to this action that will also receive consideration under a second alternative or additional alternatives, and will be discussed in this response also. Any alternatives will be discussed and analyzed in detail in the environmental analysis process. What follows is a response to comments is based on the Proposed Action. We identified six sub-topics associated with the Iron Springs proposal. They can be found in Table 7 below.

Table 7: Iron Springs Comments Sub-topics

Iron Springs Comments Sub-topics	
1) Motorized access and entry from residential streets, especially Iron Springs Road	24 comments
2) Use of the existing trailhead at Forest Road (FR) 240 in lieu of the proposed Iron Springs Trailhead	15 comments
3) Suggestions to restrict Iron Springs access to non-motorized use only	6 comments
4) Suggestions to locate the Iron Springs Trailhead further from the community on FR 9457Y	2 comments
5) Concerns with re-routing the access road	4 comments
6) Comments in support of the Iron Springs Trailhead proposal	11 comments

Sub-topic 1:

Comment: Entry off of residential streets to the proposed Iron Springs trailhead will cause more traffic, noise, dust, etc.

Response: Concerns regarding increased traffic, noise and safety problems, in general, will be addressed in the Community Impacts comment group. Comments in this group were of similar context, but were specific to the Iron Springs trailhead proposal. We feel that much of the concern surrounding the Iron Springs trailhead may be due to misunderstanding or confusion about the Proposed Action. We feel this way because many of the concerns given describe existing issues that we are trying to reduce or eliminate with this action versus create or increase. The differences continually revolve back to the intent of the Proposed Action, which we obviously have not described clearly enough. We would like to try again here.

Our intent is to bring some level of management to existing use. Existing use includes the gradually increasing use inherent to all National Forests that will occur with or without the project. The concern common to nearly all of the comments against the trailhead assumes that its implementation would lead to dramatically increased use, especially by non-resident visitors. This project is not designed as a destination experience and is only designed for what is occurring now and for gradually increasing use. More detailed discussion of this factor will be included in both the environmental analysis.

While we understand the fears of dramatic increases in use to your neighborhood we hope that clarification of our intent will alleviate this concern for some of you. We will discuss the no-action alternative in detail later in this response, as that has also been suggested, but we

are assuming that most of the community doesn't think the current situation of unmanaged use is working.

Sub-topic 2:

Comment: The existing trailhead parking area off Forest Road (FR) 240 is adequate for motorized access needs, and the FR 240 trailhead is close enough to the proposed location of the Iron Springs trailhead. Therefore, there is no need for an additional trailhead at Iron Springs.

Response: The Proposed Action provides for non-motorized use in the area of the FR 240 trailhead. The trails connecting the FR 240 trailhead and the Iron Springs trailhead will be non-motorized. Our intent is to separate the motorized use from non-motorized use areas, and the suggestion in the comment above would fail to meet that aspect of the proposal's purpose and need.

The FR 240 trailhead currently provides motorized opportunities for street-legal users via FR 240, and will continue to do so (under the Proposed Action). Further, the assumption that the current and proposed trailheads are so close as to negate the need for the new trailhead is incorrect. The two sites are approximately two miles apart and are designed to serve separate purposes. In addition a major drainage separates the two locations and the FR 240 trailhead would have no direct motorized connection to the proposed motorized trail system due to the objective of a non-motorized area. In addition creating an unnecessary conflict between motorized and non-motorized users, establishing a motorized trail in this location would involve substantial construction to cross the drainage and is beyond our intent to use existing trails and roads to the greatest extent possible. The amount and complexity of trail construction in this area would greatly expand the scope of the project.

Comment: The FR 240 lot needs to be enlarged and that a motorized trail system needs to be created there.

Response: The intent of the project was to separate these two kinds of uses in this area. The area around the FR 240 trailhead is intended for non-motorized uses. The size of FR 240 parking area has been adequate for most needs. Use of this parking area will be monitored in the future, and if its size is determined to be too small it could be expanded.

Comment: Iron Springs trailhead access should be restricted to pedestrian use only. The 9457 road should be closed to ATV access (no motorized access from the north side of the community).

Response: The Forest Service is legally mandated by Congress to provide multiple-use recreation, which inherently includes motorized recreation. We have proposed both motorized and non-motorized trail opportunities emanating from the proposed Iron Springs Trailhead, as this is a central location, is currently heavily used by ATVs, and well-designed and constructed motorized trails could be sustained by the land in this area. However, we have identified this as a facet of the significant issue associated with building the trailhead near Iron Springs. **UPDATE: Alternatives C and D address this concern.**

Comment: The proposed location of the Iron Springs trailhead is too close to residential areas. It should be moved further from the Forest boundary, and it should be designed to accommodate a maximum of only ten cars.

Response: The proposed location is out of sight of most homes in Pinewood/Munds Park. The location was chosen for its separation from the private land and will be designed to accommodate only ten cars at a time. The location, however, is just a proposal and based on your comments we may consider other alternatives in addition to this site. **UPDATE: Alternative D has been developed to address this concern.**

Comment: Concern of the rerouting motorized use from Iron Springs Trailhead to FR 78B on the proposed alignment rather than on 9457Y would lead to soil and water impacts.

Response: The proposed alignment serves two purposes: to close and obliterate FR 9457Y beyond the proposed trailhead as this road is slated for closure in the Forest Plan; secondly the proposed trail route would be designed and constructed to Forest Service trails standards to mitigate soil and water impacts. **UPDATE: Alternatives C and D address this issue by eliminating the motorized trail from the trailhead to the motorized loop.**

Comment: The Iron Springs trailhead is well placed.

Response: We appreciate your support for the proposed site for the trailhead.

Comment Group: Community Impacts

Approximately 40 comments were grouped into this section, which includes 5 sub-topic areas. These comments generally pertain to concerns, questions, or statements about impacts from the project within the community and are not directed at a specific location in the project. Most if not all of these comments would fit sub-topic one, but breakouts have been made when a comment mentions a specific problem in addition to the general concerns. The 5 sub-topic areas are listed in Table 8 below.

Sub-Topic 1:

Comment: Accessing motorized trails from residential streets. Specific concerns are too much and/or increasing traffic, and concerns over safety of people using streets.

Response: Concerns with increasing traffic, noise, and safety are important for us to consider as we continue the analysis for this project. While the Proposed Action, and this analysis is applicable to only the National Forest lands surrounding Munds Park and the US Forest Service has no jurisdiction off the National Forest, in the community, we will consider any impacts on the adjacent community for any project on the National Forest.

Table 8: Community Impacts Sub-topics

Community Impacts Sub-topics	
Concerns for community impacts in general from noise, increased traffic and safety	26 comments
Concerns about potential increases in camping on the fringes of the community leading to an increased threat from wildfire to private property and increased litter problems	2 comments
Concerns about increased use by non-resident Forest visitors	7 comments*
Concerns about access by non-street legal ATV users from the community	2 comments
Several comments expressed the position that they would prefer no motorized use in the forest adjacent to the community	3 comments

* Sub-topic overlaps with one comment above

A managed roads and trails system on the National Forest will not only manage use on the forest and mitigate the impacts of that use; it can have effects on the adjacent community. While traffic on residential streets may increase in Munds Park, the community is largely built out with little opportunity for growth. This combined with a trail system designed not as a destination but to accommodate local use should limit any dramatic increase in traffic.

The current use of the National Forest around Munds Park is already threatening to cause significant resource damage in the area. That fact alone is causing the Forest Service to attend to this area with a planning effort. This planning effort represents an opportunity for the community to assist the Forest Service in designing a system that meets both the public's needs and the resource's needs.

An important fact to remember is that maintaining public safety and the enforcement of county and state laws off National Forest System Lands and in the community of Munds Park is the responsibility of county and state public safety agencies, not the United States Forest Service. The Forest Service is a federal government agency with no authority to enforce local or state laws.

Comment: This proposal will diminish property values and will adversely affect our rural community lifestyle.

Response: The Forest Service does not feel that the designation of a trail system around Munds Park will jeopardize the rural lifestyle of the community. Research has shown that proximity to trail systems actually is a benefit, and may increase property values. Further, this proposal seeks to manage currently unmanaged use, and it will therefore lessen future impacts on residents of the community. It will also lessen impacts to the natural resources in the area that this community values. In addition since there is little room within the community of Munds Park for growth, major development affecting the rural lifestyle is unlikely.

Sub-Topic 2:

Comment: We are concerned that people will camp on the fringes of Munds Park, increasing the threat of theft, uncontrolled fire and litter.

Response: The Proposed Action does not designate any new camping areas in the vicinity of Munds Park, and in fact this proposal closes a significant area to camping in the vicinity of Crystal Point (please refer to the map attached to the Proposed Action). Currently there are no restrictions on areas for camping.

According to the Forest Service Division of Law Enforcement and Investigations, and local police agencies, there is little or no correlation between burglaries, vandalism and similar crimes and the proximity to National Forest system trails. Crimes of this type are very rare and essentially unheard of. In very close proximity to the City of Flagstaff, the Coconino National Forest has an extensive trail system and crimes of this type have not occurred.

In regard to burglaries, vandalism, etc., research has shown that burglaries related to trails in National Forest are rare. In other words, proximity of trails to National Forest System Lands and burglaries do not correlate with each other. Inquiries with the Flagstaff Police Department and Coconino County Sheriff's Department bear this fact out, because neither of these law enforcement agencies can discover any increase in crimes committed due to residential proximity to the National Forest.

Sub-topic 3:

Comment: Some Munds Park residents feel that the Proposed Action will cause large influxes in traffic and people into the community to use this trail system.

Response: Currently, all of the National Forest lands surrounding Munds Park is open to motorized use. This proposal and other current motorized use planning efforts will significantly reduce the area open to motorized use. Therefore, the attractiveness of this area to unrestricted motorized use will lessen, as while the trail opportunities will be better in quality, there will be fewer miles to ride. Nothing in particular about this trail system will make it particularly more attractive to motorized trail users than the other hundreds of miles of open motorized roads and trails across the rest of the Coconino National Forest. In addition, this system will not be advertised as a destination experience.

Sub-topic 4:

Comment: The project design will force non-street legal, unlicensed ATV riders to use residential streets to access trailheads.

Response: The Forest Service cannot provide riding opportunities for non-licensed ATVs in the community, off the National Forest. The proposed action provides riding opportunities for both street legal and unlicensed ATVs in the forest. Unlicensed ATVs must be hauled to the National Forest. Providing trailheads with ATV trailer parking for these users reduces the need for unlicensed ATV users to illegally travel residential streets.

Sub-topic 5:

Comment: No motorized use of trails in the project area should be allowed.

Response: As was discussed in Sub-topic 2 of the Iron Springs trailhead section, the Forest Service is mandated to provide for multiple use recreation opportunities. Even though some Munds Park residents may be opposed to motorized recreation, other residents support this activity.

Currently all of the National Forest surrounding Munds Park is open to motorized use. This proposal will designate 15 miles of trail and a substantial portion of the 7,700 acre project area as completely non-motorized. 6.6 miles of trails will be designated for motorized use with no off-trail motorized use allowed. This proposal provides both non-motorized and motorized recreation and in separate locations for both user groups. While the small number of miles of motorized trail may sound like too few to the motorized user, these trails will connect to the hundreds of miles of roads and trails open to motorized use outside the Munds Park area.

The Forest Service is legally mandated by Congress to provide multiple-use recreation, which inherently includes motorized recreation. Even though a particular Pinewood/Munds Park resident may personally oppose motorized recreation, other residents in Pinewood/Munds Park are in favor of this form of recreation. The proposal will designate some trails and areas as non-motorized. This is a huge change from the existing condition and current use, which allows unrestricted motorized access. For instance, currently the entire 7500 acres of the Munds Park project area is legal accessible to motorized use. Implementing a designated trail system for motorized use and issuing a off-road use closure on the project area reduces the acres open to motorized use to only those affected by designated routes. While this may sound extreme to the motorized user, the proposed designated trail system connects the greater Forest road and motorized trail network that totals hundreds of miles.

Comment Group: Iron Springs Trailhead Section

The Iron Springs Trailhead and parking area received by far the greatest amount of comment. This particular concern is by and large the biggest issue with the proposal, and in fact, the majority of comments relate to this issue in some form. We received 62 comments on this specific action, including a petition with 273 names signed. We will consider an alternative without the Iron Springs action. Other options have been suggested in relation to this action that will also receive consideration under a second alternative or additional alternatives, and will be discussed in this response also. The following response to comments is based on the Proposed Action and alternative discussion will be done in the environmental analysis process. We identified six sub-topics associated with the Iron Springs access concern, please see table 9.

Table 9: Iron Springs Trailhead Sub-Topics

Iron Springs Trailhead Sub-Topics	
Motorized access and entry from residential streets, especially Iron Springs Road.	24 comments
Use of the existing trailhead at Forest Road (FR) 240 in lieu of the proposed Iron Springs Trailhead.	15 comments
Suggestions to restrict Iron Springs access to pedestrian use only.	6 comments
Suggestions to move the Iron Springs Trailhead further down the access road.	2 comments
Concerns with re-routing the access road.	4 comments
Comments in support of the Iron Springs Trailhead proposal.	11 comments

Sub-topic 1:

Comment: Entry off of residential streets to the proposed Iron Springs trailhead will cause more traffic, noise, dust, etc.

Response: We recognized and addressed concerns for increased traffic, noise and safety problems, in general, in the Community Impacts group. Comments in this group were of similar context, but were specific to the Iron Springs trailhead proposal. However, the previous response applies to this specific location as well. We feel that much of the concern surrounding the Iron Springs trailhead may be due to misunderstanding or confusion about the Proposed Action. We feel this way because many of the concerns given describe existing issues that we are trying to reduce or eliminate with this action versus create or increase. The intent of the Proposed Action was to bring a level of management to the existing use. Existing use includes expected increasing use that will occur with or without the project. The concern inherent in nearly all of the comments against the trailhead assumes its creation will dramatically increase use, especially by non-resident visitors. Please refer to our previous statements, that this project does not advertise for a destination experience and is only designed for what is occurring now and for background increased use. **UPDATE: Alternative D addresses this issue.**

Sub-topic 2:

Comment: The existing trailhead parking area off of Forest Road (FR) 240 is adequate for motorized access needs, and the FR 240 trailhead is close enough to the proposed location of the Iron Springs Trailhead. Therefore, there is no need for an additional trailhead at Iron Springs.

Response: The PA provides for non-motorized use in the area of the FR 240 trailhead. The trails connecting the FR 240 trailhead and the Iron Springs trailhead will be non-motorized. Our intent is to separate the motorized use from non-motorized use areas, and the suggestion in the comment above would fail to meet that aspect of the proposal’s purpose and need.

The FR 240 trailhead currently provides motorized opportunities for street-legal users via FR 240, and will continue to do so (under the PA).

Further, the assumption that the current and proposed trailheads are so close as to negate the need for the new trailhead is incorrect. The two sites are actually two miles apart and are designed to serve separate purposes. In addition a major drainage separates the two locations and the FR 240 trailhead would have no direct motorized connection to the proposed motorized trail system due to the objective of a non-motorized area. In addition to the motorized versus non-motorized conflict with setting, establishing a motorized trail in this location would involve substantial construction to cross the drainage and is beyond our intent to use existing trails and roads to the greatest extent possible. The amount and complexity of trail construction in this area would greatly expand the scope of the project.

Comment: The FR 240 lot needs to be enlarged and that a motorized trail system needs to be created there.

Response: The intent of the project was to separate these two kinds of uses in this area. The area around the FR 240 trailhead is intended for non-motorized uses. The size of FR 240 parking area has been adequate for most needs. Use of this parking area will be monitored in the future, and if its size is determined to be too small it could be expanded.

Comment: Iron Springs Trailhead access should be restricted to pedestrian use only. The 9457 road should be closed to ATV access (no motorized access from the north side of the community).

Response: The Forest Service is legally mandated by Congress to provide multiple-use recreation, which inherently includes motorized recreation. We have proposed both motorized and non-motorized trail opportunities emanating from the proposed Iron Springs Trailheads as this is a central location, is currently heavily used by ATVs, and is well-designed and constructed motorized trails could be sustained by the land in this area. Again, we would like to hear more of your thoughts as we may consider alternatives with or without this trailhead. **UPDATE: Alternatives C and D address this concern.**

Comment: The proposed location of the Iron Springs trailhead is too close to residential areas. It should be moved further from the Forest boundary, and it should be designed to accommodate a maximum of only ten cars.

Response: The proposed location is a distance from homes and out of sight of most homes in Munds Park. The location was chosen for its separation from the private land and will be designed to accommodate only ten cars at a time. The location, however, is just a proposal and based on your comments we may consider other alternatives in addition to this site.

Comment: Concern of the rerouting motorized use from Iron Springs trailhead to FR 78B on the proposed alignment rather than on Forest Road 9457Y would lead to soil and water impacts.

Response: The proposed alignment serves two purposes: to close and obliterate FR 9457Y beyond the proposed trailhead as this road is slated for closure in the Forest Plan; secondly the proposed trail route would be designed and constructed to Forest Service trails standards to mitigate soil and water impacts.

Comment: The Iron Springs trailhead is well placed.

Response: We appreciate your support for the proposed site for the trailhead.

Comment Group: Janice Place Parking Area

We received 18 comments that were specific to the Janice Place access location. We have identified six sub-topics associated with these comments, listed in Table 9.

Table 9: Janice Place Parking Area Sub-topics

Janice Place Parking Area Sub-topics	
Restrict access to pedestrian use only	4 comments
There should be no parking allowed at Janice Place access	1 comment
The Janice Place TH is not necessary if Iron Springs TH is established	1 comment
Construct a parking lot at Janice Place in lieu of Iron Springs	4 comments
Post and sign the Janice Place TH, for licensed use only	4 comments
Comments in support of Proposed Action at Janice Place	4 comments

Sub-topic 1:

Comment: Access to this site should be pedestrian only. The trails at Janice Place should be non-motorized. There are a lot of user conflicts between hikers and motorized users in this location. Many of the hikers are elderly and don't want to use the trails when they are motorized.

Response: Please refer to the pedestrian only comment response in the Iron Springs comment section.

Sub-topic 2:

Comment: This parking site should not be promoted or advertised, because such would draw too many people to this site.

Response: Nothing in the proposal calls for this parking site to be advertised or promoted. The trailhead would likely be included on Forest Service maps, however.

Sub-topic 3:

Comment: Parking should not be allowed in Janice Place, because overflow, when the site is full, will spillover onto residential streets.

Response: Parking on Janice Place will be limited to the National Forest Lands that this street occupies. No trailers will be allowed on this site, and the number of sites will be limited as well. Currently, citizens can park on Janice Place regardless of their use of the National Forest. Concerns with people parking on residential streets should be directed to Coconino County, not the USDA Forest Service.

Sub-topic 4:

Comment: Because of lack of space and traffic hazards, parking should not be allowed at Janice Place. The parking at Iron Springs will meet the need for parking.

Response: The two proposed access points serve different purposes. The Janice Place site accesses the multi-use trail system with very limited parking; the Iron Springs site will provide access to both multi-use and non-motorized trails. Further, parking at Janice Place may be construed to be hazardous now. Under the proposal, the site would be slightly widened and improved, in order to mitigate some of the safety concerns.

Sub-topic 5:

Comment: Having no trailer parking at Janice Place with a connection to the motorized trail open to unlicensed ATVs would encourage illegal, unlicensed riding on residential streets.

Response: Unlicensed ATVs may be hauled to the proposed Iron Springs Trailhead to access the motorized trail system. This motorized system connects with the trail leaving Janice Place. Please refer to the Community Impacts section comment response regarding unlicensed ATV use on residential streets.

Comment: Parking should be allowed at Janice Place, and should not be allowed at Iron Springs, and vice versa.

Response: Two trail access points were proposed to provide multiple opportunities to access the motorized trail system. Currently a significant number of motorized users access the National Forest from Janice Place and the proposal was designed to accommodate, reduce the impact and manage this existing use. Having multiple access points will spread the use between locations, rather than focus and increase use at a single location; in addition the improving of the road to the proposed Iron Springs access trailhead was considered to reduce parking on residential streets by those who did not want to drive on the rough road to access the National Forest.

Sub-topic 6:

Comment: Support for Janice Place access.

Response: We appreciate your support for the proposed site for the access.

Comment Group: I-17/Willard Springs Road Trailhead, APS Substation, FR 78A Suggestions, in lieu of Iron Springs Trailhead.

We received 16 comments related to dropping the Iron Springs Trailhead and establishing a trailhead or trailheads in the vicinity of the Willard Springs Road, the APS Substation, and FR 78A. We have grouped these comments into 3 sub-topics, listed in Table 10.

Table 10: Alternative Trailhead Sites Sub-topics

Alternative Trailhead Sites Sub-topics	
Opposed to the Proposed Action because of Iron Springs Trailhead proposal, when there is better access at Willard Springs Road	9 comments
Establish a trailhead at the APS Substation in lieu of Iron Springs Trailhead	4 comments
Establish a trailhead on FR 78A near Frog Tank in lieu of Iron Springs Trailhead	3 comments

Sub-topic 1:

Comment: Drop the Iron Springs Trailhead and establish one or more in the vicinity of the Willard Springs Road. This will alleviate traffic concerns created by non-resident users in the community.

Response: This option is available with or without this proposal and there is plenty of parking opportunity without the need for a trailhead. This option would essentially be no change from current use and fail to address access concerns currently being experienced within the community. The proposed Iron Springs trailhead would provide access to the multi-use and non-motorized trail system at a convenient location for most Munds Park residents while Willard Springs and the other proposed locations are less convenient for Munds Park residents and more appealing to those from outside the community. **UPDATE: See EA Section, Alternatives considered but dropped from further analysis.**

Sub-topic 2:

Comment: Establish a trailhead at the APS Substation in lieu of the Iron Springs trailhead.

Response: The APS substation was reviewed as a potential access point and rejected as it was not proximate to the proposed trail system and currently there is little public use of the National Forest in this area. As such, establishing a trailhead in this area would fail to alleviate the resource concerns being addressed by the Proposed Action along the north boundary of the Pinewood/Munds Park community. **UPDATE: See EA Section, Alternatives considered but dropped from further analysis.**

Sub-Topic 3:

Comment: Establish a trailhead near FR 78a and Frog Tank in lieu of the Iron Springs trailhead.

Response: We have field-reviewed locations for this option. There is a large meadow area that could accommodate a trailhead and parking area. However this location has several environmental concerns in addition to failing to meet the purpose of the Iron Springs trailhead. The mountain meadow habitat is one of the most endangered vegetation types in our forest and locating a trailhead and parking in the meadow would certainly lead to a degradation of these unique resources. Through managed access and designated trails we have a chance to improve that habitat with this proposal. **UPDATE: See EA Section, Alternatives considered but dropped from further analysis.**

In addition this location is very near a stock/wildlife water. Promoting concentrated activity so near to the water source would not be desirable environmentally. We looked at other options along FR 78A and came to a similar conclusion to that of the Willard Springs suggestion. A trailhead and parking area is not needed to accommodate use in this area and the option fails to address the community access concerns the proposal is trying to reduce with the Iron Springs location by managing currently heavy use of that area.

Comment Group: Christensen Rest Area

There were 10 comments suggesting using the Christensen Rest Area off I-17 as a trailhead/parking area, in lieu of the Iron Springs location. These comments were very similar and can be addressed as one group:

Sub-topic 1:

Comment: Establish a trailhead at the existing Christensen Rest Area at I-17, in lieu of the Iron Springs trailhead.

Response: As we were researching this option we were informed by ADOT that there is currently a proposal before the state legislature to re-open the Rest Area to public use under ADOT management. ADOT would entertain a proposal for a pedestrian trail from the rest area but would not consider motorized trail access from the site. The proposal is expected to be approved as it is backed by the state Transportation Board. The intent of the suggested options for use of the rest area was to address motorized access and parking concerns at the proposed Iron Springs trailhead. Because ADOT can only accommodate pedestrian use at this location we have dropped this suggestion from further consideration. **UPDATE: See EA Section, Alternatives considered but dropped from further analysis.**

Comment Group: Environmental Impacts

There were 18 comments that identified various environmental concerns. We have categorized these into four sub-topics listed in Table 11.

Table 11: Environmental Impacts Sub-topics

Environmental Impacts Sub-topics	
Wildlife effects in general and specific to stock tanks	8 comments
Increased Fire Danger	5 comments
Watershed effects	3 comments
Range effects	1 comment

Sub-topic 1:

Comment: There will be noise disturbance from motorized use to wildlife. Mud bogging and pollution is occurring and will continue to occur at stock tanks from motorized use.

Response: The proposed action provides designated routes away from stock/wildlife waters. Currently access to these areas is unrestricted, and legal, unless someone is caught in the act of causing damage. Providing a designated trail system with an associated cross-country travel closure will help in the enforcement of these illegal activities. Most users try to comply with the rules, laws and regulations when they are known. There are a small percentage of users who don't care now and won't care regardless of what is proposed.

Having a designated system with a cross-country closure will make all such motorized entry illegal and improve enforcement capabilities. The environment for wildlife at these locations will improve substantially from the current situation.

Sub-topic 2:

Comment: There will be an increased threat of fire to the community due to recreation users. This comment is usually framed with the assumption of increasing use by non-residence visitors.

Response: We share the concern of increasing wildfire risk to communities in the urban interface. This is a national concern and is one of the highest priorities for management we have today.

Specific to this proposal, providing a managed road and trail system will reduce this threat from what it is currently. Also, the proposal would establish a no camping area in the vicinity of Crystal Point trail, which when combined with the designated trail system and motorized cross-country closure order is a reduction of threat. Some have asked why we don't close the area to all camping. This is an action we try to avoid taking except in cases where the character of the forest environment has changed to such a degree that the setting is more urban than wild or there are incompatible conflicts with sensitive plants and wildlife. Also, we do institute no camping restrictions in times of high fire danger through Forest fire restrictions. By limiting the area and timing of these types of restrictions to periods of high fire danger the forest remains open for dispersed recreation, which is one of the most highly valued activities in the National Forest.

Sub-topic 3:

Comment: ATV use causes rutting of soils. Wildlife waters are polluted with oil when ATVs are driven into them.

Response: We share the concerns for soil and watershed damage occurring from both motorized and pedestrian use and reducing or eliminating these impacts are a major goal of the project. Providing ATV and pedestrian use on a managed trail system with a motorized cross-country closure order will greatly reduce these impacts from the current unmanaged/unrestricted use.

Sub-topic 4:

Comment: How will the cattle be affected by the proposal?

Response: The range allotment manager for this area is in favor of the proposed road and trail system and sees it as benefiting both the cattle and the range/vegetation resource through

the reduction of the amount of area the cattle must share with recreation users and reduced impacts to soil and vegetation.

Comment Group: Specific Roads and Trails Comments

There were 32 comments related to specific roads and/or trails. Because many of these comments were identified very specific concerns with locations or trail design or actions, 17 sub-topics have been identified for response. These are listed in Table 12.

Table 12: Specific Roads and Trails Comment Sub-topics

Specific Road and Trails Comment Sub-topics	
Need Trails from Residential Access Points to Collector Trail	3 comments
Taking away too much Motorized	2 comments
Need Additional Non-Motorized Trail Loop from Horse Park to 240 Rd. Trailhead	1 comment
Need Separate Hiking and Biking Trails.	2 comments
Make ATV Access Closer to Businesses.	1 comment
Need More ATV Trails and Access	5 comments
Need Motorized Trail Connection from FR 78A to 700.	2 comments
Don't Close FR's 78B, 9457Y, 9492D	1 comment
Crystal Point Trail needs to Connect to 240 Lot	1 comment
Handicapped Parking and Access Not Addressed in PA	1 comment
Crystal Point Trail should be Pedestrian Only.	1 comment
Proposed Motorized Loops don't give enough motorized trail	5 comments
Don't Close North Lodge Access	1 comment
Flooding Problems on Motorized Trail between Janice Place and Iron Springs.	1 comment
Need Small Parking Area at Odell Lake.	1 comment
Confused about Motorized access from a Non-Motorized system at Iron Springs Trailhead.	1 comment

Sub-topic 1:

Comment: Trails are needed from the residential access points to the collector trail proposed north of the community. The current design would provide only cross-country access to the collector trail, which is not conducive to many of the current users.

Response: We agree with this concern. We are doing additional inventory on the social trail system associated with these pedestrian access points and will determine what existing routes we can leave for this access. Routes that will be retained are those that are not causing significant resource damage and could be “accepted” as system trails. Some of these trails are going to occur anyway, we would just like to reduce them in number. We will target duplicate routes and those causing unnecessary soil and vegetation damage. These will show as additions to the current proposal and will be retained in any additional alternatives to the Proposed Action.

Sub-topic 2:

Comment: The Proposed Action takes away too much motorized access. This is a “big” take away and will not be accepted by the users. Providing a motorized trail from the FR 240 trailhead that loops back to the Iron Springs trailhead would provide a more acceptable system for motorized users.

Response: By designating a motorized trail system and motorized cross-country closure the current un-limited access is admittedly affected. However, unlimited cross-country access is going to be affected at a greater scale in the near future under other ongoing travel management plans being conducted on a multi-forest level. By having a designated system the Munds Park area will be one of the first in the state of Arizona to have a designated motorized trail system responding to these future management policies. Other locations with similar motorized use will have to go through this same process to identify the designated system. Motorized users in this area will actually be ahead of most other areas in this respect. Limitations on cross-country travel are inevitable. Places without a designated system will have much more limited access until this type of planning is done.

We discussed our concerns and limitations concerning a motorized route looping back to the Iron Springs trailhead from the FR 240 trailhead under a similar suggestion in the Iron Springs Comment Group.

Sub-topic 3:

Comment: There is a need for a non-motorized trail from Horse Park back to FR 240 trailhead to create a loop experience associated with the non-motorized trail originating at the Iron Springs trailhead to keep from having to backtrack down the same trail.

Response: An additional non-motorized trail loop from the Horse Park area to the FR 240 trailhead was not included in the proposed design as current use levels indicate this increase in new trail mileage was necessary at this point. Additional miles of construction add significantly to the project cost and such expenditures are avoided when possibly unnecessary. However, the Forest Service and community members can monitor trail use and if such a loop connection is warranted in the future, it could be considered. **UPDATE: See EA Section, Alternatives considered but dropped from further analysis.**

Sub-topic 4:

Comment: We need to make separate trails for hiking and biking. There are user conflicts between the two. One commenter indicated that they have been run off the trail on two separate occasions by bikers and that bikers should warn pedestrians when coming up from behind them.

Response: Conflicts between different trail users groups are a concern on all multiple-use trails that can be resolved with a variety of methods. There are a large number of hikers and bikers and even some equestrians using the trails in the Flagstaff urban interface and a concerted “share the trails” education effort has led to a reduction in user conflicts. More importantly the proposed trails in the Pinewood/Munds Park area would be designed with potential conflicts in mind. During design and construction factors that reduce conflict such as adequate sight distance, turns and curves in the trail to reduce bike speed, and other features help prevent such situations of conflict. Both of these methods, education and design, will be used in trail construction in the Munds Park/Pinewood area to reduce user conflict.

Sub-topic 5:

Comment: Can we make ATV access areas closer to businesses to reduce noise and traffic impacts to residential neighborhoods.

Response: Unfortunately we do not have any legal access near any of the existing businesses in the community. Please consider our other discussions concerning existing use versus increasing use and anticipated noise and traffic impacts.

Sub-topic 6:

Comment: There have been several comments saying that the proposed action does not provide enough motorized trails. This sub-topic includes comments that requested additional motorized trails to Mud Tank and the need for a motorized trail from Mud Tank to Horse Park.

Response: The response to the Sub-topic 2 comment in this section address the need for more motorized trails in general. This discussion would also apply to the specific request for additional trails to Mud Tank and from Mud Tank to Horse Park. In addition to that discussion we would clarify that there is motorized access at or near both these locations although it is street legal access. Street legal ATV users can ride the extensive network of Forest System Roads accessible from this area for longer distance riding opportunities. There is not adequate room in the vicinity of the Munds Park/Pinewood community to establish such long distance routes without leading to disturbance of local residents and increasing conflicts with non-motorized users. We are intentionally eliminating motorized access to Mud Tank due to environmental concerns for wildlife and the watershed. A motorized route from Mud Tank to Horse Park changes the whole intent of providing a non-motorized area in this portion of the system. UPDATE: See EA Section, Alternatives Considered, but Dropped from Further Analysis.

Sub-topic 7:

Comment: There is a need for a connection from FR 78A to FR 700. It appears one would have to travel a great distance to hook up with FR 700 and cannot be done with the proposed system.

Response: There is a connection from FR 78A to FR 700 that was just off of the map we had on display. The solution for this concern exists on the ground and will be maintained as part of the Proposed Action and in any additional alternatives.

Sub-topic 8:

Comment: Don't close Forest Roads 78B, 9457Y and 9492D.

Response: There was no specific reason attached to this assertion, so we are unsure of concern with closing these roads, in addition there was no name or contact information with the comment. However, reduced access is often a concern associated with forest road closures and because the commenter listed several roads we might safely assume that is the concern. The 78B and 9457Y roads have been listed for closure in our Forest Plan for over a decade. These are redundant or otherwise undesirable due to resource concerns and are not needed for a roads and trails system. Alternative routes are available for forest access in the same areas. The 9457Y road was identified through site-specific analysis as having the same problems as the previously described roads. Because no specific concern or reason for not closing these roads was given that would make us reconsider we wish to continue with the Proposed Action for these roads.

Sub-topic 9:

Comment: The Crystal Point Trail needs to connect to the FR 240 trailhead.

Response: There is currently a social trail connection from the Crystal Point trail to the trailhead; this trail will be adopted and reconstructed.

Sub-topic 10:

Comment: Handicapped parking and access was not addressed and we did not identify what will be done for this in the Proposed Action.

Response: Handicapped parking and access was not addressed in the Proposed Action but the O'Dell Lake loop trail was designed so that in the future it could be upgraded to be handicap accessible. No component of the Proposed Action would violate the American's With Disabilities Act if implemented. The need for handicap accessibility to the trail system will be monitored and could be included in future projects.

Sub-topic 11:

Comment: The Crystal Point trail should be pedestrian only as the trail is too narrow for shared use between bikers and hikers.

Response: please refer to our response in sub topic 4.

Sub-topic 12:

Comment: The proposed motorized loop trails are too limited and will cause over-use.

Response: The proposed loops are intended for short duration experience and access for non-street legal users. They connect to the greater roads and trails system of the forest for long duration experience for more extensive excursions. These trails will be designed and constructed to a standard to withstand intensive motorized use. There is a limited amount of acreage in the Pinewood/Munds Park area to implement both a motorized and non-motorized trail system that limits impacts on natural resources and meets the needs of the community and other forest visitors. It was our intention with the project design to accommodate non-licensed ATV users with a limited motorized trail network, and encourage motorized use on the greater Forest Road network. In addition, due to many community residents concerns with large numbers of people coming to the Munds Park/Pinewood area to use ATVs, the

motorized system was designed to be small, accommodate local use, but not be a destination system or ATV area like the Cinder Hills east of Flagstaff.

Sub-topic 13:

Comment: Don't close the motorized access at North Lodge.

Response: We have been unable to determine an existing legal access point to the National Forest at this location, or any evidence that people are access the Forest from any point other than their private property.

Sub-topic 14:

Comment: There will be flood problems with the motorized trail between Janice Place and Iron Springs during the spring run-off. The trail will be inaccessible during these periods.

Response: It is unavoidable that some crossings during the spring run off will be inaccessible for short periods of time without construction efforts beyond the scope of what we are proposing for this project. We hope the inconvenience will be of short duration in most years. The trail will be constructed in such a way that this circumstance will be accounted for to the greatest degree possible.

Sub-Topic 15:

Comment: There is a need for a small parking area at the Odell Lake access point.

Response: We have the same concern, but field checks have verified that without construction beyond that intended for by this project, a parking area is not available. The Proposed Action identifies that in the future we would like to develop this trail further into a Class 4 (handicapped accessible) trail, however that would come after the proposed system has been installed.

Sub-topic 16:

Comment: I am confused about how there can be motorized access from a non-motorized system at the Iron Springs trailhead.

Response: We believe this comment stemmed from confusion about access to the Iron Springs trailhead. The trailhead is accessed by a forest road, which allows motorized access. There is also a motorized trail, which begins at the trailhead.

Comment Group: Law Enforcement Concerns

There were 21 comments with concerns pertaining to concerns both with in the community and on the forest in relation to law enforcement capabilities. These concerns address concerns with current inadequacies as well as abilities to responds to increasing use. We have identified 4 sub-topics associated with this comment group, listed in Table 13.

Table 13: Law Enforcement Comments Sub-topics

Law Enforcement Comment Sub-topics	
Proposal will exacerbate law enforcement shortage	10 comments
Proposal will increase illegal ATV use problem in the community	6 comments
Enforcement is needed to stop meadow damage, wildlife harassment and to reduce fire risk	3 comments
Reduce non-motorized vs. motorized encounters	2 comments

Sub-topic 1:

Comment: There is not currently enough law enforcement presence in the community or on the forest and monitoring in both places needs to be increased. The proposal will exacerbate this problem due to increased use.

Response: We share the concern that our law enforcement folks are under-staffed. While we are unable to speak for the Sheriffs Department about future funding and availability of officers and we can't responds to concerns regarding illegal activity within the community as this outside our jurisdiction, we know they share the same concerns and frustrations. However, several of the comments express fears that this situation will get worse due to this proposal.

We have addressed the increased use concern and explained our intent in that regard in previous responses. We would re-iterate here that a managed system greatly improves the capabilities of the limited law enforcement we do have over the current situation. Having a designated trail system for ATV users will improve the ability of law enforcement officers to catch and issue citations to those users that are traveling cross country, driving inside tanks or violating other laws. Currently ATV users can travel cross-country, and unless they can be linked to specific resource damage, there are few repercussions that law enforcement can take. Although the new regulations will not increase the number of officers, it will increase their effectiveness when they catch ATV users driving off road because they will be able to issue citations based upon the forthcoming regulation dealing with off-trail use of ATVs rather than having to link the individuals to specific incidences of resource damage. In turn, this could decrease the incidence of off-road resource damage, the occurrence of wildlife harassment, and damage to stock tanks.

Sub-topic 2:

Comment: There is increasing illegal ATV use and unlicensed drivers in the community.

Response: As ATV use has dramatically increased over the last ten years, it is unfortunate that some of this impact has been and will be felt by the communities, especially those that border national forest. The state of Arizona requires that ATVs and their users be properly registered and licensed with the motor vehicle department when operating their ATVs on roads; however, Forest Service personnel do not deal directly with this issue within the community setting. Concerns regarding ATV use in the community should be passed on to the Coconino County Sheriff's Department rather than the US Forest Service.

Sub-topic 3:

Comment: Law enforcement needs to stop the damage being done to meadows, wildlife harassment, and people causing fire hazards.

Response: Please refer to previous comment responses that address how the Proposed Action reduces these impacts and improves our abilities for enforcement.

Sub-topic 4:

Comment: There are conflicts between motorized and non-motorized users. ATVs are forcing hikers off the trails. One commenter has been forced off the trail more than once.

Response: As we have explained in previous responses the Proposed Action provides a combination of non-motorized and multiple use trails. Currently there is no managed use and all trails and forest area is shared. While conflicts between motorized users and non-motorized users can become a law enforcement problem if done in a threatening or harassing manner, this issue is typically more of an awareness and education issue. Because we can't provide separate trails everywhere this conflict will continue and will be unavoidable on occasion. We can't promise to guarantee that all users will be polite. We can promise to continue to educate and inform users of proper trail use as much and often as we can. We have experience that says this situation improves under a managed system, which this proposal would provide.

Comment Group: Calls for No Action

We received 14 comments calling for no action. These comments have been categorized into 3 sub-topics. The No Action Alternative is a required alternative under the National Environmental Policy Act (NEPA) and will be discussed and analyzed in detail in the environmental analysis. The sub-topics are listed in Table 14.

Table 14: No-Action Alternative Comment Sub-topics

No-Action Alternative Sub-topics	
Leave things as they are. All of this development is unnecessary	7 comments
The proposal will increase use and therefore cause wildlife disturbance	2 comments
The proposal will increase use and therefore increase fire danger to the community	5 comments

Sub-topic 1:

Comment: A number of people who commented have asked us to drop the project as they feel it is unneeded and that things are fine the way they are, saying all of this development is a waste of time and not needed.

Response: We will analyze the effects of a No-Action Alternative in detail as required by NEPA in the environmental analysis.

Sub-topic 2:

Comment: Increased use due to this proposal will increase wildlife disturbance. Things should be left as is.

Response: In addition to the response given under Sub-topic 1 above, we would also refer to previous discussion that describes the benefits of a managed system versus an unmanaged system.

Sub-topic 3:

Comment: Proposal will increase use and subsequently increase fire danger to the community. The project should be dropped.

Response: Please refer to the response in Sub-topics 2 and 3.

Comment Group: Disagreement with MUTS/MUTS representation

This comment group had 5 comments. It is categorized by one sub-topic.

Sub-topic 1:

Comment: MUTS does not represent this community.

Response: We understand that the Munds Park Trails Stewards (MUTS) do not represent all of the members of the Munds Park community. However, MUTS has been an invaluable asset to us as interested community members willing to work hard to find solutions to problems identified on the National Forest around the community.

The assistance volunteers provide to the Forest Service in all aspects of our land management activities is absolutely invaluable. We welcome the efforts and energy of all volunteers who coordinate their work with us. In this regard, MUTS has volunteered to assist the Forest

Service in a great number of projects including removing litter from the forest around the community, to working on the Crystal Point trail, adopting the Forest Road 240 trailhead and even assisting us with the development of the Proposed Action for this project. Their input and assistance has been invaluable.

This does not mean, however that we will only look to MUTS for assistance. All members of the Munds Park community are equally welcome to provide their assistance, comments and concerns to the Forest Service regarding this process or any issue.

The Proposed Action, however, is not a proposal from MUTS or from the community of Munds Park; it is a proposal by the Forest Service. It is okay to disagree with MUTS, with the Forest Service, and with this Proposed Action, that is what the public involvement process of NEPA is all about. But remember, the NEPA process is not a vote. Each and every comment is considered equally.

Comment Group: Questions and Reference to the Munds Survey

There were four comments regarding the Munds Survey. These comments have been categorized into two sub-topics in Table 15.

Table 15: Munds Survey Comments Sub-topics

Munds Survey Sub-topics	
Survey results regarding motorized vs. non-motorized use	3 comments
My response to the survey was miss-represented in regards to motorized use	1 comment

Sub-topic 1:

Comment: Why is motorized use being proposed when 71% of the community respondents said they didn't want it?

Response: The survey results indicated that 71% of respondents used the National Forest for walking, while 45% indicated they would support a trail system including motorized trails and 24% indicated they would oppose such a multiple-use trail system. Again, the survey was only one of many methods used in developing the Proposed Action.

Comment: My response to the survey was misrepresented in regard to motorized use.

Response: We are sorry that you feel your response was misrepresented. As was stated in both the previous response and others in this document, the survey was only one tool used in developing the Proposed Action and its results were not the only data used by the Forest Service.

Comment Group: Spending Federal Dollars on this Project

There were 10 comments categorized as one sub-topic questioning why we would be spending federal dollars on this project when there are higher needs worldwide and the federal budget is in bad shape.

Comment: We should not be spending federal dollars on this project when the National budget is so tight and there are higher social needs.

Response: While there are many pressing needs in the United States for the limited amount of money available, the Forest Service does not have the authority to spend funds allocated to us by Congress in ways other than Congress directed. Every year in the federal budget the President and Congress allocate a certain amount of money to the Forest Service earmarking it for a variety of program areas. That money is then distributed to those programs nationwide. Every National Forest in the National Forest System, including the Coconino then receives a certain amount of money for work like hazardous fuels reduction, trails, recreation, wilderness, roads and other programs. The Munds Park Roads and Trails project is being funded using money allocated to the Forest by Congress for trails projects. This money cannot be redirected for other work.

Comment Group: Miscellaneous Comments

There were 10 comments we have categorized as miscellaneous as they are unique and stand-alone.

Comment: Asking the public to use environmental impact to make comments is unfair. The Forest Service has had years to study the environment and we are asking the public to do that job in 30 days.

Response: The NEPA analysis process is a mandatory study of the potential environmental impacts of a major federal action. As this is the nature of the analysis as mandated by the law, we must seek public comment on those potential environmental impacts. However, social and economic concerns are also required to be studied in these analyses. In a project such as this, where we are working around a community and part of the purpose and need of the project is to try and resolve or reduce community impacts. This component of the analysis is of utmost importance. As such we accept any and all comment and review and assess each and every one of them, though we request an emphasis on environmental concerns. The idea for specifying what type of comment we are looking for is to help keep the comment focused on concerns specific to this project proposal. Otherwise we tend to receive a lot of comment that is outside the scope of the project.

Comment: The Pinewood Property Owners Association should not finance the project.

Response: There is no Pinewood Property Owners Association funding, nor has any been requested for this project. This is a Forest Service undertaking.

Comment: You need to clearly state what you are proposing. Commenter especially found the map and trail types proposed at Iron Springs confusing.

Response: Through the Environmental Analysis process will we attempt to further clarify the Proposed Action as well as any and all alternatives analyzed. We will also review the maps and try to make them clearer in regard to trail types in the EA.

Comment: The Forest Service should solicit funds and donations for litter cleanup, including installation of collection pipes, similar to those used in campgrounds to be placed at trailheads, asking for donations for litter clean up.

Response: The Forest Service needs all the help we can get keeping the National Forest as free from litter as possible. Soliciting donations for litter cleanup is not as effective as the assistance volunteers can provide. We welcome people to sign up as a Forest Service volunteer and assist us not only collect litter, but prevent people from littering. Members of the Munds Park community have already signed up as volunteers and are already collecting litter, maintaining the Crystal Point Trail, and helping us with other improvements.

Comment: Why don't you have a meeting for those who don't use the forest at all – non-users, and then have a meeting for users only. This commenter was upset that non-users would have a say.

Response: As explained before we consider all comment. There are many citizens who don't use this specific area but have an interest in how it is being managed. Because this is federal public land a comment from a non-user in New Jersey who has never been to Arizona has as much standing as any other person. The idea of separate meetings under these categories does not accomplish our goals for collaborative process.

Comment: Dogs should be on leashes at all times.

Response: We agree, especially in high use trail areas. County laws require pets to be on leashes and these laws apply to the National Forest.

Comment: Accessing the Forest is not an issue. The MUTS keeps talking about access for everyone. Why don't we pave the Forest around Munds Park? Access for everyone is not justified.

Response: We should clarify that our intent is to provide access to a variety of user types. We are not suggesting that the entire National Forest must be accessible to every type of user. In addition, the Proposed Action calls for a managed trail system around Pinewood/Munds Park and improved access to that trail system to elevate some of the natural resource impacts occurring now. The proposed trails would accommodate a variety of user types, but not necessarily every trail would be appropriate for all user types.

Comment: There is nothing in the proposal about public restrooms.

Response: That is correct, when the Proposed Action was developed the addition of restrooms was not considered.

Comment: All areas in Wilderness are closed to motorized use.

Response: It is correct that congressionally designated Wilderness Areas are closed to motorized use. There are no Wilderness Areas or Wilderness Study Areas within the project boundary.

Comment Group: Comments in Agreement or in support of the Proposed Action

There were 22 comments that expressed agreement with or support for the Proposed Action.

Response: We can only say thank you for your support and hope to continue to develop a project that all can be proud of and support before we are finished.

APPENDIX B – ROADS ANALYSIS REPORT

A detailed analysis of the Forest Service transportation system was conducted for the Munds Park project area. The results of this analysis, including possible road maintenance levels can be found in Table 16, below.

Table 16: Roads Analysis Summary

Road number	Miles	Operational ML	Objective ML	Munds PA	Legal Use Status
78A	1.96	2	2	D (78C to 78C)* 2 (78C to 78B)	78C to 78B legal for non-licensed ATV use
78B	0.40	2	2	2-open 78A to 9462D	Legal for non-licensed ATV use.
78B	2.00	1	D	D	ATV use prohibited
78C	0.50	2	2	2-open	Legal for licensed ATV use.
240	1.96	3	3	3-open	Legal for licensed ATV use.
700	2.90	3	3	3-open	Legal for licensed ATV use.
226F	0.35	2	2	D *	ATV use prohibited
9457Y	0.31	1	D	2-open to TH Alt. D: Close and Gate	Alt. A: Legal for licensed ATV, Alt. C and D: ATV use prohibited
9457Y	2.29	2	2	D *	ATV use prohibited
9462B	0.18	2	1	D	ATV use prohibited
9462D	1.38	1	D	D	ATV use prohibited
9462E	0.50	2	2	D *	ATV use prohibited
9462E	0.70	1	D	Convert to Trail	Legal for non-licensed ATV use.

Road number	Miles	Operational ML	Objective ML	Munds PA	Legal Use Status
9462F	0.30	1	D	D	ATV use prohibited
9767S	0.24	2	1	2-open *	Legal for licensed ATV use.
9468G	1.08	2	1	Close –Gate for Fire and Timber Access*	ATV use prohibited
9469S	0.84	2	2	2-open	Legal for non-licensed ATV use.
9469W	0.74	2	1	D *	ATV use prohibited
9491L	0.40	2	1	D	ATV use prohibited
9492D	1.31	2	2	D *	ATV use prohibited
9493C	1.42	2	1	Convert to trail	ATV use prohibited
9495C	0.90	2	2	D *	ATV use prohibited

* change from amendment 4 of the Forest Plan.

ML = maintenance Level

D =decommission

Definitions:

Maintenance level:

Maintenance levels define the level of service provided by, and maintained for, a specified road. Several factors are considered when selecting a maintenance level.

1. Resource needs and protection.
2. Road investment protection.
3. Service life.
4. User safety, comfort and convenience.
5. Volume and type of traffic, including travel speed.
6. Surface type
7. Administrative objectives.

Roads may be maintained at one level currently, the operational maintenance level and planned to be maintained at different level at some future date, or the objective level.

Maintenance level descriptions:

Level 1. Assigned to roads closed to vehicular traffic during the time they are closed. The closure period must exceed one year. Roads receiving level 1 maintenance may be of any type.

Level 2. Assigned to roads open for use by high clearance vehicles. Passenger cars are not a consideration. Traffic is normally minor. These may have been constructed for a single use, such as log haul.

Level 3. Assigned to roads open and maintained for passenger cars by a prudent driver. Safety is considered but user comfort and convenience are not considered priorities.

Level 4. Assigned to roads open and maintained for passenger cars and designed and maintained to provide a moderate level of user comfort and convenience at moderate speeds.

Level 5. Assigned to roads open and maintained for passenger cars and designed and maintained to provide a high level of user comfort and convenience. These roads are normally double lane and paved.

System roads: (classified) Those roads which have been inventoried and incorporated into the Forest transportation system and assigned maintenance levels.

Non-System: These roads are user-created, often referred to as social roads. They are not part of the Forest transportation system. They have not been assigned maintenance levels and they need to be evaluated for incorporation into the system or decommissioned. These are also referred to as “unclassified roads”.

Decommission Road: The road prism and structures have been altered and/or removed where necessary to restore basic drainage patterns and return the land to the underlying resource allocation. The road is removed from the Forest road category. Conversion to trail may be appropriate. This term replaces the old term “obliteration”.

FSR: Forest Service Road.