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September 20, 2017

RE: Scoping Comments – Arizona National Scenic Trail Comprehensive Plan #49535

Your comment has been received by our system on 9/20/2017  
Your letter ID is **49535-2030-23**.

This correspondence is in response to the U. S. Forest Service scoping notice initiating planning for the future protection and management of the Arizona National Scenic Trail. In this document, I have provided a few comments on the scoping material provided by the Forest Service. In the **attached** National Scenic Trail Planning Handbook, I review other National Scenic Trail planning considerations, which may help clarify and supplement agencies planning processes.

### **Scoping Notice Cover Letter**

*The scoping notice cover letter states, that “our planning team is currently developing a comprehensive plan for the AZNST that will guide future administration and management of the trail for the next 15-20 years. The National Environmental Policy Act requires assessment of the environmental impacts of locating the trail on federal lands and we plan to analyze the proposed action in an environmental assessment. The Chief of the Forest Service is responsible for approving the Arizona National Scenic Trail comprehensive plan... Development of comprehensive plan is critical to ensure the protection of the trail's key resources, values, and visitor experience. The comprehensive planning process provides an opportunity to develop a vision for future opportunities and desired conditions along the trail.”*

I appreciate the overview of comprehensive planning for the AZNST (16 USC 1244(e)); In addition, I recommend that future introductory discussions touch on the importance of describing the AZNST rights-of-way (16 USC 1246(a)(2)) and defining the AZNST “nature and purposes” (16 USC 1246(c)). It should also be mentioned that the Chief is responsible for selecting the corridor for National Scenic and National Historic Trails and publishing notice of availability of required maps and descriptions in the Federal Register. The Regional Forester is responsible for, approving the location of these trails within the applicable corridor and signing notices for the Federal Register of availability of maps and descriptions of the location of these trails (16 U.S.C. 1246(a)(2) and (b)).

In addition to the steps described, I recommend that the comprehensive plan, with amendments for the Coronado, Coconino, and Kaibab National Forests, be supported by an EIS to establish plan components that provide for the nature and purposes of the AZNST. Specific to the Tonto NF, I recommend that the revised plan (and EIS) be developed in coordination with the AZNST Comprehensive Plan resulting in one integrated plan for the Tonto National Forest. Associated BLM Resource Management Plans should be amended in a similar manner to address the requirements found in BLM directive MS-6280. A Federal Register Notice of Intent should described that the Forest Plans associated with the AZNST may need to be amended.

The AZNST is a national resource. As such, I recommend that the planning team offer a webinar to cover materials presented at the planned public meetings along the AZNST. Invitees could include Partnership for the National Trails System members.

### **Scoping Document**

**What is the Arizona National Scenic Trail:** The scoping document asks, “*What is the Arizona National Scenic Trail?*” I recommend supplementing this discussion with information from the Trails for America report and a legislative history discussion. The Bureau of Land Management has established policy direction in directive MS-6280 for National Landscape Conservation Areas, including providing direction for the management of National Trails. The following presents an important definition from this BLM directive that provide context for understanding the essence of a national trail comprehensive plan:

*National Scenic Trail. A continuous, long-distance trail located on the ground by the land-managing agency along the congressionally designated route, in coordination with the trail administering agency. A National Scenic Trail provides maximum compatible outdoor recreation opportunity and conservation and enjoyment of the nationally significant scenic, historic, natural, and cultural resources, qualities, values, and associated settings and the primary use or uses of the areas through which such trails may pass. National Scenic Trails represent desert, marsh, grassland, mountain, canyon, river, forest, and other areas, as well as landforms that exhibit significant characteristics of the physiographic regions of the Nation. National Scenic Trails include the tread, or the trail path, and the trail setting which is included within the National Trail Management Corridor....*

**How do we accomplish our vision for the future:** The scoping document describes what the comprehensive plan will accomplish?

- “*Establish trail-wide guidance to define how resources are to be protected and visitor uses and experiences are to be achieved;*
- *Consider the concerns, expectations and values of the public and landowners along the trail and define the role of managers and partners to ensure management decisions promote the efficient use of public resources; and*
- *Provide direction for addressing the unique challenges and demands of protecting the resources, qualities, values and associated settings of the trail and its corridor, and the outstanding opportunities for a diversity of non-motorized recreation experiences.”*

I support the described outcomes. Comprehensive planning should also result in amending Forest Plans and Resource Management Plans. The extent of the corridor needs to be described as defined within the selected rights-of-way (16 USC 1246(a)(2)).

**Key Components:** The scoping document states that, “*Key components of this comprehensive plan will:*

- *describe the nature and purposes of the trail, including primary trail uses and the desired trail experience;*
- *describe the trail corridor, including significant natural, historical, and cultural resources to be preserved;*
- *delineate the minimum management corridor needed to protect the Arizona Trail and its associated resources, qualities, values and uses;*

- *identify objectives and practices for protecting the trail and its corridor;*
- *provide guidelines for trail standards, facility development, trail marking, and visitor capacity; and*
- *provide recommendations for protecting lands through acquisition, easements or agreements that include details for cooperating with local landowners to manage the trail.”*

I agree with these components, except that I would delete the word, “minimum.” Instead, I would amend the relevant Forest Plans and Resource Management Plans as necessary to describe the extent of a National Trail Management Corridor. In addition, Plan components need to be established that protect the nature and purposes of the AZNST, including establishing standards/thresholds plan components.

**Preliminary Concerns and Opportunities Identified:** The document lists preliminary concerns and opportunities:

- *“Portions of the designated route are located on motorized routes (roads and trails);*
- *Some current management designations along the route include uses that substantially interfere with the nature and purposes of the trail;*
- *The unavailability of potable water makes portions of the trail unusable for several months of the year;*
- *In some sections, insufficient or inconsistent trail maintenance and signing pose safety concerns and detract from national scenic trail values;*
- *Equestrian and mountain bike use is not adequately accommodated along the length of the trail;*
- *Trail use and events on the Arizona National Scenic Trail are increasing and need to be managed in a way that does not detract from the trail experience and opportunities for all users;*
- *Other existing or proposed land uses along the designated route create impacts that damage scenic resources and the recreation experience of visitors in the short term and, in some cases could permanently damage the values for which the trail was designated.*
- *Connecting the trail to nearby communities supports economic growth and community development.”*

I agree with these preliminary issues, except that potable water and maintenance may be best addressed at the project-level of comprehensive planning. I would add concerns of not having the rights-of-way described (16 USC 1246(a)(2)), National Trail Management Corridor extent described, and the AZNST travel route officially located.

**The Proposed Action:** Elements of the proposed action include:

- *“Nature and purposes unique to the Arizona National Scenic Trail, including the desired key characteristics of the trail experience and the primary trail uses [NTSA Sec. 7(c)];*
- *Recommended trail route relocations that provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities along the route [NTSA Sec. 3(a)];*
- *Connecting and side trails to provide additional public access or additional recreational opportunities [NTSA Sec. 6; FSM 2353.32];*

- *A trail management corridor of sufficient width to manage the trail in accordance with its nature and purposes and provide for the conservation and enjoyment of the associated significant resources [NTSA Sec. 3(a)];*
- *Objectives and practices for managing the trail corridor, including the identification of significant natural, historical, and cultural resources to be preserved, to ensure the values for which the trail was established remain intact [NTSA Sec. 5(e); EO 13195];*
- *An identified carrying capacity and/or the process and criteria for determining carrying capacity of the trail and a plan for its implementation [NTSA Sec. 5(e)].”*

I support the listed elements of the proposed action. In addition, I would add the need to (1) identify the rights-of-way (16 USC 1246(a)(2)), (2) identify plan components that protect the AZNST nature and purpose/values, and (3) provide integrated AZNST management direction through amendments or revision of Land Management Plans and Resource Management Plans.

**Nature and Purposes:** The nature of the AZNST is described as, *“The Arizona National Scenic Trail is a primitive, non-motorized long-distance route that preserves and showcases the unique and diverse scenic, natural, historic and cultural treasures of Arizona and our nation. The Trail experience provides opportunities for quality recreation, self-reliance and discovery within a corridor of open space defined by the spectacular natural landscapes of the state.”*

I recommend adding to this vision statement description to clearly recognize AZNST corridor protection.

The purposes of the AZNST is described as:

- *“Connecting deserts, mountains, forests, wilderness, canyons, communities, and people;*
- *Linking existing and new trail segments to form a continuous pathway south to north across the state;*
- *Providing high quality recreation and educational experiences for Arizona’s residents and visitors;*
- *Promoting land stewardship in the development and use of the trail in a way that cultivates appreciation and protection of the State’s natural and cultural resources as a legacy for future generations;*
- *Promoting multiple non-motorized trail uses, primarily hiking, horseback riding, mountain biking, and cross-country skiing on a shared trail while observing local land management objectives;*
- *Continuing the existing model of public-private partnership to create and maintain a long-distance trail.*
- *Offering wildness, remoteness and solitude while providing opportunities for day use as well as longer treks.”*

I mostly agree with the listed purposes; however, an AZNST purpose should not be described as being subordinate to *“local land management objectives.”* In addition, I would add a purposes of conserving natural, historic, and cultural resources along the corridor.”

**Trail Management Corridor:** The scoping document describes that, “*The trail management corridor is the area managed to provide for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities and to ensure that the values for which the trail was established remain intact. The corridor is an area similar to a management area found in programmatic land management plans, managed primarily for the Arizona Trail experience and used to focus administration, management and protection for the trail, its nature and purposes, and its associated qualities, values and settings.*”

I agree with this description of the Trail Management Corridor. I would add that the Trail Management Corridor is addressed in land management plans as a FS Management Area or BLM National Trail Management Corridor with Plan Components or Management Actions/Resource Use Determinations that support the nature and purposes of the AZNST.

**Objectives and Practices:** The scoping document describes that, “*Objectives and practices provide fundamental direction to ensure the national scenic trail values are preserved and the nature and purposes of the trail are realized. The objectives and practices define conditions to be achieved and practices used to maintain the desired characteristics of the trail experience and protect resources across management boundaries. They direct the overall management of the trail and guide the development of land management plan standards and guidelines and site specific project planning within the trail corridor. Objectives and practices may apply to the entire trail or they may apply only to certain landscape settings, visitor opportunities, or land allocations across the trail... Objectives and practices provide comprehensive direction to inform the development of federal land management plan components, and to guide the oversight and protection of the trail on non-federal lands... Objectives and practices specific to the Arizona Trail will be developed as a part of this proposal through public and agency contribution, and analysis of resource conditions and social impacts related to the desired trail experience. A list of preliminary objectives and practices is located in appendix B.*”

I agree with this preliminary description of objectives and practices. However, the discussion needs to include a clear explanation for how the NTSA defined objectives and practices will be addressed as plan components, management actions, and resource use determinations in Forest Service and BLM land and resource management plans. The comprehensive plan will need to describe that defined NSTA objectives may not have the same meaning as NFMA/FLPMA objectives.

Congress’ Statement of Policy provision in the National Trails System Act of 1968 states that “[i]n order to provide for the ever-increasing outdoor recreation needs of an expanding population and in order to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation, trails should be established (i) primarily, near the urban areas of the Nation, and (ii) secondarily, within scenic areas and along historic travel routes of the Nation which are often more remotely located.” NTSA Sec. 2(a). A stated purpose of the NTSA “is to provides the means for attaining these objectives by instituting a national system of recreation, scenic and historic trails, by designating the Appalachian Trail and the Pacific Crest Trail as the initial components of that system, and by prescribing the methods by which, and standards according to which, additional components may be added to the system.” NTSA Sec. 2(b).

**Visitor Capacity Parameters:** The scoping document describes, in part, that, “*Identifying visitor capacity, or carrying capacity, of the trail is required by the National Trails System Act and is an important tool for achieving and maintaining desired conditions. Visitor capacities may vary across time (e.g., season, day of week) and from site to site and segment to segment, depending on the desired conditions and issues of the specific area.*”

Carrying capacity will need to be addressed using many of the processes described for Wild and Scenic Rivers. Possibly, Recreation Opportunity Spectrum parameters can be useful. Land use plans will need to establish clear carrying capacity thresholds to prevent degradation of AZNST values.

**Primary Concern/Opportunity**

My primary concerns with the described AZNST comprehensive planning project is (1) not selecting the rights-of-way and (2) not simultaneously providing for the integration of National Scenic Trail direction in Forest Service and BLM land management plans. I urge the Forest Service, BLM, and NPS to take this opportunity to address all programmatic AZNST land use planning needs as an integral part of preparing comprehensive planning direction for the AZNST.

Thank you for considering these scoping comments.

Greg Warren

Attachment – NST Planning Handbook