

## Greg Warren

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**From:** Greg Warren <NSTrail@comcast.net>  
**Sent:** Thursday, January 04, 2018 9:23 PM  
**To:** tontoplan@fs.fed.us  
**Cc:** NSTrail@comcast.net; 'White, Laura -FS'  
**Subject:** Tonto National Forest - Draft Plan Comments (Delivery Receipt Requested)  
**Attachments:** tonto\_aznst\_noi\_submittal\_04192017.pdf; Arizona National Scenic Trail Management Corridor.pdf

Neil Bosworth, Forest Supervisor  
Tonto National Forest  
Attention: Plan Revision  
2324 E McDowell Road  
Phoenix, Arizona 85006

RE: Draft Plan Comments

Dear Mr. Bosworth:

I appreciate this opportunity to comment on the Draft Tonto Forest Plan. The following are recommendations that address Arizona NST plan components. These recommendations supplement Notice of Intent comments that I submitted on April 19, 2017.

### Management Area – Arizona National Scenic Trail (Draft Plan, pages 112-114)

#### Description

The Arizona National Scenic Trail (AZNST) stretches over 800 miles across Arizona from Mexico to the Utah border, showcasing the state's diverse vegetation, wildlife, wilderness and scenery, and providing unparalleled opportunities for hikers, mountain bikers, equestrians, and other trail users. The Omnibus Public Land Management Act of 2009 (P.L. 111-11) amended the National Trails System Act (P.L. 90-17 543) to designate the Arizona Trail as a national scenic trail.

The Tonto National Forest manages 200 miles of the AZNST on the Globe, Mesa, Tonto Basin, and Payson Ranger Districts. *The Arizona National Scenic Trail management area corridor encompasses 98,000 acres.*

#### Desired Conditions

- The AZNST *travel route* is a well-defined trail in a highly scenic setting traversing the state of Arizona. The AZNST provides for high quality primitive hiking, equestrian opportunities, and other compatible non-motorized trail activities. *The corridor encompasses national trail resources, qualities, values, associated settings and the primary use or uses. This includes vistas, campsites, water sources, and other important resource values.* Significant scenic, natural, historic, and cultural resources along the AZNST's corridor are conserved.

- Viewsheds from the AZNST have high scenic values. The AZNST provides visitors with expansive views of Arizona. The foreground of the AZNST (~~up to 0.5 mile on either side~~) appears natural and generally unaltered by human activities. The potential to view wildlife is high, and evidence of ecological processes such as fire as well as insects and disease exist.
- *The setting of the Arizona National Scenic Trail corridor is consistent with or complements a primitive or semi-primitive nonmotorized ROS class setting. ROS class inconsistencies are managed to protect AZNST values.*
- The AZNST has access points that provide various opportunities to select the type of terrain, scenery, and trail length (e.g., ranging from long distance to day use) that best provide for compatible outdoor recreation experiences.
  - ~~Wild and remote backcountry segments of the AZNST provide opportunities for solitude, immersion in natural landscapes, and primitive outdoor recreation.~~
  - ~~Front country and easily accessible trail segments complement local community interests and needs and help contribute to their sense of place.~~
- Conflicts among trail users are infrequent.
- The AZNST *travel route* is well maintained, signed, and passable. Alternate routes are made available in the case of temporary closures resulting from natural events (e.g., fire or flood) or land management activities.

## Objectives

- All segments of the AZNST that are currently located on motorized roads will be relocated to non-motorized trails within 5 years.
- Portions of the AZNST within sensitive heritage sites will be relocated around the sites within 5 years.

## Standards

- *Manage the AZNST travel route as a visual quality concern level 1 travel route. Resource management actions must meet a Scenic Integrity Level of Very High or High.*
- *Resource management actions and allowed uses must be compatible with maintaining or achieving Primitive or Semi-Primitive Non-Motorized ROS class settings.*
- *Motorized use by the general public may only be allowed where such use is in accordance with guidance found in the NTSA Section 7(c).*
- ~~Management of the AZNST shall comply with the most recent version of the AZNST Comprehensive Management Plan.~~
- No common variety mineral extraction (e.g., limestone, gravel, etc.) shall occur within the AZNST corridor.
- Motorized events and motorized special use permits shall not be permitted or authorized on the AZNST.
- *Other uses that could conflict with the nature and purposes of the Arizona National Scenic Trail may be allowed only where there is a determination that the other use would not substantially interfere with the nature and purposes of the AZNST (16 USC 1246(c)).*

- *Where the AZNST corridor overlaps with Wilderness designations the most restrictive measures control.*

## Guidelines

- ~~If management activities result in short-term impacts to the scenic character along the AZNST, mitigation measures should be included (e.g., screening, feathering, and other scenery management techniques) to minimize impacts at key locations (e.g., vistas) within the trail corridor.~~
- In order to promote a non-motorized setting, the AZNST should not be permanently re-located onto routes open to motor vehicle use.
- Trail facilities necessary to accommodate the amount and types of use anticipated on any given segment along the AZNST should be provided in order to protect resource values and for health and safety in order to preserve or promote a naturally appearing setting.
- ~~To protect the AZNST's scenic values, special-use authorizations for new communication sites, utility corridors, and renewable energy sites should not be visually apparent within visible foreground (up to 0.5 miles).~~
- Linear utilities and rights-of-way should be limited to a single crossing per special use authorization of the AZNST unless additional crossings are documented as the only prudent and feasible alternative.
- New temporary and permanent road or motorized trail construction across or adjacent to the AZNST should be avoided unless necessary for resource protection, access to private lands, or to protect public health and safety.
- Special use permits that affect AZNST should include scenery management considerations.
- Management activities should maintain safe public access to AZNST.
- ~~AZNST should be consistent with management direction in the trail establishment reports as well as the maintenance standards for trail class and use.~~
- Unplanned fires in the foreground (up to 0.5 miles) of the AZNST should be managed using minimum impact suppression tactics or other tactics appropriate for the protection on AZNST values. Prescribed fires in the foreground [??]
- Use of national historic, scenic, and recreational trails for fireline should be avoided.

## Management Approaches

- Work with volunteer groups, partners, local governments, and adjacent landowners to maintain AZNST corridor, the condition and character of the surrounding landscape, and to facilitate AZNST user support and reduces use conflict. Ensure that Incident Management teams are aware of the AZNST as a resource to be protected during wildfire suppression activities. Clearly identify fire suppression rehabilitation and long-term recovery of the AZNST corridor as high priorities for Incident management teams, BAER teams, and post-fire rehabilitation interdisciplinary teams.
- ~~Establish appropriate visitor use levels for specific segments of the AZNST and take appropriate actions if there is a trend away from the desired condition.~~

- Identify and pursue opportunities to acquire lands or rights-of way within or adjacent to the AZNST as they become available.
- Provide consistent signage along the AZNST corridor at road crossings to adequately identify the AZNST and include interpretation at trailheads.
- Use side and connecting trails to access points of interest or Gateway Communities away from the AZNST.
- ~~To protect the AZNST scenic values, consider not allowing highly visible, special-use authorizations for new communication sites, utility corridors, and renewable energy sites within the middle ground viewshed (up to four miles).~~
- ~~Trail corridor protection strategies should closely follow the authorities of the National Trails System Act (16 USC 1246), using public lands whenever possible.~~
- ~~Consider expansion of connector trails to accommodate user access when near towns and developed recreation facilities.~~

Thank you for considering these comments.

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## Greg Warren

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**From:** Greg Warren <NSTRail@comcast.net>  
**Sent:** Monday, January 08, 2018 9:57 AM  
**To:** tontoplan@fs.fed.us  
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**Subject:** Draft Tonto Forest Plan - Sustainable Recreation Resources and Opportunities to Connect People

Neil Bosworth, Forest Supervisor  
Tonto National Forest  
Attention: Plan Revision  
2324 E McDowell Road  
Phoenix, Arizona 85006

RE: Draft Plan Comments

Dear Mr. Bosworth:

I appreciate this opportunity to comment on the Draft Tonto Forest Plan. I reviewed the recreation management direction found in the Draft Plan on pages 73 through 84. I recommend that the planning team review the requirements of FSH 1909.12 23.23a – *Sustainable Recreation Resources and Opportunities to Connect People with Nature* to ensure that the Forest Plan is consistent with the Planning Handbook requirements. In the Draft EIS, please provide maps that display the proposed ROS class allocations to be established for each alternative, including making available to the public supporting geospatial data. The ROS classes should be defined with more detail than provided in the Draft Plan. I recommend that the following ROS class definitions be adopted for the Forest Plan and be addressed in the supporting NEPA documents:

Recreation Opportunity Spectrum: The Recreation Opportunity Spectrum planning framework is the recognized framework for stratifying and defining classes of outdoor recreation environments, activities, and experience opportunities through forest planning. The settings, activities, and opportunities for obtaining experiences have been arranged along a continuum or spectrum divided into six classes:

- **Primitive:** Primitive ROS settings encompass large, wild, remote, and predominately unmodified landscapes. Additional primitive ROS settings are scattered across the forest, often surrounded by SPNM settings. Primitive ROS settings contain no motorized and mechanized vehicles and there is little probability of seeing other people. They provide quiet solitude away from roads and people or other parties, are generally free of human development, and facilitate self-reliance and discovery. Signing, and other infrastructure is minimal and constructed of rustic, native materials. Ecological processes such as fire, insects, and disease exist. **Standard:** Motor and mechanized vehicles are not allowed in established Primitive settings. **Guidelines:** (1) No new permanent structures should be constructed in desired Primitive ROS settings to maintain the unmodified character of these landscapes; (2) Less than 6 parties per day encountered on trails and less than 3 parties visible at campsite; and (3) Setting should essentially be an unmodified natural

environment. No roads, timber harvest, or mineral extraction are allowed. Suitability: (1) Motorized and mechanized recreation travel are not suitable; (2) The SIO of Very High is suitable; and (3) Lands are not suitable for timber production. (Inventory criteria: 3 miles from motorized use.)

- Semi-Primitive Nonmotorized: Semi-Primitive Non-Motorized settings provide opportunities for exploration, challenge, and self-reliance. Rustic structures such as signs and foot bridges are occasionally present to direct use and/or protect the setting's natural and cultural resources. These rustic constructed features are built from native materials or those that mimic native materials. Closed and revegetated roads may be present but do not dominate the landscape or detract from the SPNM experience of visitors. Ecological processes such as fire, insects, and disease exist. Standard: Motor vehicle use by the general public is not allowed. Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPNM settings; (2) Less than 15 parties per day encountered on trails and less than 6 parties visible at campsite; and (3) Vegetative management may range from prescribed fire to very limited timber harvest for the purpose of maintaining a healthy, attractive semi-primitive setting. Suitability: (1) Motorized recreation travel is not suitable; (2) The SIO of High or Very High are suitable; and (3) Lands are not suitable for timber production. (Inventory criteria: ½ to 3 miles from all roads, trails, rivers, lakes and railroads with motorized use.)
- Semi-Primitive Motorized: Semi-Primitive Motorized settings provide motorized recreation opportunities in backcountry settings. Routes are designed for Off Highway Vehicles (OHVs) and high clearance vehicles that connect to local communities, access key destinations and vantage points, provide short day trips on scenic loops or facilitate longer and even overnight expeditions. Visitors challenge themselves as they explore vast, rugged landscapes. Mountain bikes and other mechanized equipment may also be present. Facilities are rustic and are used for the purpose of protecting the setting's natural and cultural resources. Bridges are sometimes present to accommodate foot, horse and ATV traffic but are built from native or natural appearing materials that blend with the surrounding landscape and maintain the semi-primitive character of the setting. There may also be nodes that function as portals for visitors to park their ATVs and explore adjacent Semi-Primitive Non-Motorized and Primitive settings. (Inventory criteria: ½ mile from primitive motorized roads and trails, not closer than ½ mile of better than primitive roads.)
- Roaded Natural: I recommend that the proposed action and alternatives describe the following ROS subclasses:
  - Roaded Natural - Mostly equal opportunities to affiliate with other groups or be isolated from sights and sounds. The landscape is generally natural with modifications moderately evident. Concentration of users is low to moderate, but facilities for group activities may be present. Challenge and risk opportunities are generally not important in this class. Opportunities for both motorized and non-motorized activities are present. Construction standards and facility design incorporate conventional motorized uses.
  - Roaded Modified - Roaded Modified is defined as areas exhibiting evidence of forest management activities that are dominant on the landscape. Examples of RM include heavily logged areas, evidence of mining, oil/gas, or other minerals extraction activities.

Thank you for considering these comments.

Greg Warren