



Arizona State Association of Four Wheel Drive Clubs
P.O. Box 23904
Tempe, Arizona 85282

July 17, 2018

Kerwin S. Dewberry, Forest Supervisor and Reviewing Office
Coronado National Forest
300 W. Congress St.
Tucson, AZ 85701

Re: Santa Catalina Ranger District TMP

The Arizona State Association of Four Wheel Drive Clubs, Inc. (ASA4WDC) would like to submit the following comments on the Motorized Transportation Plan for the Santa Catalina Ranger District.

Public access is one of the most important issues concerning our public lands. As recreationalists we have lost countless access points into our public lands and believe this should be a number one priority with this plan. Access issues should be considered and possibly plan for permanent access where possible.

Guarantee that the Arizona State Park Grant Funding monies are not part of the closures on this district, these grants were issued in 2000 and 2000 and totaling \$547,050. This is public monies that require routes to be open a minimum of 25 years. The Redington Pass Backcountry Touring Area map shows the routes that were to be open under this grant. The map also shows the 50" roads/trails that were to be installed as connector trails to bypass the main road and was printed in 2005. These should be shown on the MVUM and clearly designated. Possibly closely doted black line to indicate motorized use under 50", and added to the legend. This would make the roads consistent across forests.

Permittees should only have exclusive use of a route under permit grants but for no other reason, unless that route is open to the public.

Possibly remove incentives for private property owners to block access to the Forest and eliminate their ability to profit from exclusive access, such as exclusive hunting permits. This might keep some private property owners from blocking access.

The Santa Catalina ranger district has a total of 259,674 acres and a total of 95,020 acres of Wilderness, that leaves 164,654 acres for multiple use public access. With the existing roads in the forest as it stands the road density in 0.7786 miles per acre. Tucson is a large population base with a large motorized recreation community, it is better to provide areas for motorized recreation, this in the long run will provide a better managed forest.

The Coronado National Forest had a core group in the CAT process, of which I was on for the entire process. This process took almost two years to complete. Very few if any of the comments were incorporated into the new management plan. This process was very comprehensive and included all uses involved. Suggest the Santa Catalina District review these documents to help provide better explanation as to why some routes need to remain open.

If these comments are not included in the process, it was a complete waste of the public's valuable time and the FS's money. If public opinion is requested, it should be taken into consideration.



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The following are our comments to the TMP Proposed Plan:

Route #	ASA4WDC Comments to TMP Designations	ASA4WDC Designation	FS Designation
38-9.91L-1	Retain for a challenge, with a "rooky" filter at the beginning to only allow vehicles that are capable of the challenge, organized 4 wheel drive clubs will help with the maintenance. This route could be considered a technical challenge.	NFSR – Open to all vehicles	Decommission
625	Should be left if it is a bypass for camping or hunting	NFSR – Open to all vehicles	Decommission
625A	If this route replaces 625 it should become a loop	NFSR – Open to all vehicles	Add as NFSR
642-1.18L-1	Should be closed to protect historic area, but route to the north needs to be open to allow public access to this area which has a very high use. Recommend the designation be changed to open to all vehicles. Routes that are in the IRA's are allowed to stay.	NFSR – Open to all vehicles	Decommission
642-2.03L-1	This route could be closed as long as an access is provided around it to keep the public on the trail. Due to the proximity to Catalina it will be difficult to keep this area close	NFSR – Open to all vehicles	Decommission
642-2.06L-1	This route could be closed as long as an access is provided around it to keep the public on the trail. Due to the proximity to Catalina it will be difficult to keep this area closed	NFSR – Open to all vehicles	Decommission
736-14.35L-1	Retain for a challenge, with a "rooky" filter at the beginning to only allow vehicles that are capable of the challenge. This route could be considered a technical challenge. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	Decommission
736-16.24L-1	Consider keeping this route as an extension to 640, is a good four wheel challenge and a loop route. Loop roads are needed for long connectivity and recreation. This route could be considered a technical challenge. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	Decommission
736-3.25L	This route is not shown and should be retained as it is an important by pass. Recommend adding this route as a NFSR route and designated as "restricted to administrative or permitted use only." If it is needed as a bypass for the public, it can be opened in the future.	NFSR – Open to all vehicles	Decommission
807A	Recommend leaving open for access of modified vehicles. If route remains open, it can be maintained by organized 4 wheel drive clubs to be passable in case of emergency. Use "rookie filter" to keep the stock vehicles out of this area. This route could be considered a technical challenge.	NFSR – Open to all vehicles	NFSR ML1
833-7	Leave open for dispersed camping, area is already developed that way for hunting, motorized camping and quiet recreation.	Leave open for dispersed camping	Eliminate 300 foot Camping Corridor
833-9	Leave open for dispersed camping, area is already developed that way for hunting, motorized camping and quiet recreation.	Leave open for dispersed camping	Eliminate 300 foot Camping Corridor
833-12	Leave open for dispersed camping, area is already developed that	Leave open for	Eliminate 300



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Route #	ASA4WDC Comments to TMP Designations	ASA4WDC Designation	FS Designation
	way for hunting, motorized camping and quiet recreation.	dispersed camping	foot Camping Corridor
833-14	Leave open for dispersed camping, area is already developed that way for hunting, motorized camping and quiet recreation.	Leave open for dispersed camping	Eliminate 300 foot Camping Corridor
4307-0.05R-1	This route should remain as it provides access to an area that is used for camping and staging of horses. Recommend this route remain to provide access to the Wilderness for all uses.	NFSR – Open to all vehicles	Decommission
4405A	This route is designated in the Redington Pass Backcountry Touring Area Guide printed with OHV Grant Money. If this road is to be decommissioned or change designation the money for the grant may have to be paid back to the Arizona State Parks OHV fund for the grant that was received, as the route needs to stay for 25 years as per the agreement with the grant. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles, required to remain for 25 years	Decommission
4405C	This route is designated in the Redington Pass Backcountry Touring Area Guide printed with OHV Grant Money. If this road is to be decommissioned or change designation the money for the grant may have to be paid back to the Arizona State Parks OHV fund for the grant that was received, as the route needs to stay for 25 years as per the agreement with the grant. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles, required to remain for 25 years	Decommission
4405.4 50R-1	If this route is to be closed to the public it should also be closed to the permittee, only one access should be allowed for all and not an exclusive private access to the forest for the permittee. This trail is providing exclusive private access from the Tanque Verde Ranch (private property) to the forest for commercial enterprises. Possible route extension to the main road could be considered for permittee and public access. The commercial enterprises should use the same roads as the recreational users. This route was converted to a foot trail in the Redington Pass Backcountry Touring Area Guide printed with OHV Grant Money. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only
4405.4 50R-4	If this route is to be closed to the public it should also be closed to the permittee, only one access should be allowed for all and not an exclusive private access to the forest for the permittee. This trail is providing exclusive private access from the Tanque Verde Ranch (private property) to the forest for commercial enterprises. Possible road extension to the main road could be considered for permittee and public access. The commercial enterprises should use the same routes as the recreational users. This route was converted to a foot trail in the Redington Pass Backcountry Touring Area Guide printed with OHV Grant Money. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only



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Route #	ASA4WDC Comments to TMP Designations	ASA4WDC Designation	FS Designation
4405-10.34R-1	<p>This access to the ponds is very important to recreation users, it provides for a great place to sit and enjoy a picnic. A proposal was made during the CAT process to add a parking area near the ponds to provide a location to hike from. Recommend adding a route to a parking area for "Three Ponds" location from Route 4426 the east of the 4405-10.34R-1 and 4426 intersections (see attached file Three Ponds). The route could access a parking area off an actual 4 Wheel Drive road, currently shown on the map but not numbered as a system road. This route is existing and could with little work become an access point into this area.</p> <p>The closure of this area would be a huge loss to those of us who seek a cooler place to go to when we have a little water in Arizona.</p> <p>Refer to proposal attached at the end,</p>	NFSR – Open to all vehicles	Decommission
4430	If this route is to be closed to the public it should also be closed to the permittee, only one access should be allowed for all and not an exclusive private access to the forest for the permittee. This route was converted to a foot trail in the Redington Pass Backcountry Touring Area Guide printed with OHV Grant Money. If this route is to be decommissioned or change designation the money for the grant may have to be paid back to the Arizona State Parks OHV fund for the grant that was received, as the route needs to stay for 25 years as per the agreement with the grant. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles, required to remain for 25 years	NFSR - Permittee Only
4431	Recommend that this route be retained as a ML2 and open to all vehicles.		
4431 - Reroute	Recommend this route be a ML2 and open to all vehicles. It is not shown on the maps and should be. If the process needs NEPA that can be addressed after the TMP is finished. But retain this route for possible inclusion in the future.		
4458-1.16R-1	Retain this route to provide a loop from 4467 to 4458. Can be used for multiple use and as an alternate for ATV use off the main road. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	Decommission
4458-0.18R-1	Retain this route, but decommission the short parallel part of the road to allow access to this area. Recommend the designation be changed to open to all vehicles.	NFSR – Open to all vehicles	Decommission
4467	Would suggest that part of 4467 be used to connect to 4458-1.16R-1-	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only
4477	If this route is to be closed to the public then it should also be closed to the permittee, only one access should be allowed for all and not an exclusive private access to the forest for the permittee.	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only



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Route #	ASA4WDC Comments to TMP Designations	ASA4WDC Designation	FS Designation
4487 Extension	Extend the new 4487 extension to the 4487 foot trail and make the foot trail a road. This will allow a connection to the Dodge Tank road #7705 for replacement of the Charouleau Gap entrance to avoid private property and allow access to the forest	NFSR – Open to all vehicles	Add as a NFSR
4487 Foot Trail	Retain this route for the extension and replacement of the Charouleau Gap entrance to avoid private property and allow access to the forest	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only
4493 - extension	Recommend this route be a ML2 and open to all vehicles. It is not shown on the maps and should be. If the process needs NEPA that can be addressed after the TMP is finished. But retain this route for possible inclusion in the future.	NFSR – Open to all vehicles	Add as a NFSR
7705	A proposal was made to the FS during the CAT process to retain this for the extension and replacement of the Charouleau Gap entrance to avoid the private property and allow access to the forest. The connection from route 7705 is less than a half mile that needs to be constructed to connect from Dodge Tank to the road 4487. This was a recommendation for the Forest Service to look at. The forest service would have to build a short section of road. Refer to proposal attached at the end.	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only
Hidden Spring	Provides access to Forest, route pre-dates wilderness then should be open to the public, consider vehicle class restrictions	NFSR – Open to all vehicles	NFSR – Administrative and Permittee Only

Motorized Transportation System

Desired Conditions

Most recreationalist look for backcountry experiences such as long distance loop rides with varying levels of challenges. These can be managed with manmade obstructions and education of the users.

Unneeded routes should be looked at carefully. When removing any routes, the impact will be greater on the remaining routes. Leaving more routes open will also help with recreation in the future.

Maintenance of level 2 roads does not necessarily need to be done as often as other level roads. Look at more volunteer partnerships to keep roads passable. Not all roads need to be accessible by passenger car and we would prefer they weren't there is less impact if incapable vehicles do not access all roads.

The Forest Service needs to look at what might be required in the future for roads. Consider Administrative level instead of closing the routes. These routes could be opened in the future as needed for growth.

Can a road ever be reopened if it was closed? Is there a status that might be developed for this possibility? Budget constraints being an issue in closing roads. We all know it is more difficult if not impossible to open a road once it is closed. And we do not believe that closing roads is the way to manage a forest.

Consider adding standards for performing maintenance. Look at road maintenance agreements with government agencies and private organizations to supplement Forest Service funded maintenance. Consider grants for some road



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maintenance, when applicable. Road maintenance needs to be done for water damage, but the roads do not need to be bladed smooth.

Primary purpose of the road system is to provide access to the forest and should be identified in the management process. This access isn't just for hunting and fishing, the public also requires access to the forest for backcountry touring, camping, socializing, hiking, biking and other multi use activities. Look at developing partnerships with organizations for road maintenance, consultation and public outreach.

Wilderness areas are the least important issue when access is dwindling we certainly do not need to incorporate more areas of deigned access. "Quiet recreation" can use the wilderness and Inventoried Roadless Areas (IRA) as the motorized access is dwindling and the vehicles are increasing. But if roads exist in the IRA's that provide for a small fraction of motorized recreation they should be left open. These roads provide access for those seeking "Quiet Recreation" whether they be motorized or non-motorized.

The general public needs access to our public lands. With the growing population and the growing use of off highway vehicles the need to keep our forest open to public access is going to be a bigger concern in the future.

To reduce damage to some areas, "rooky" filters could be installed to limit the vehicles not suited to the challenge. Rooky filters are considered an obstacle that is as difficult as the most difficult challenge on the trail itself. If you cannot make the first obstacle you will not make the entire trial.

People need to have a challenge, if those challenges are not met they will find another location.

Please consider these comments from the organized motorized community.

Thank you for the opportunity for our concerns to be heard.

Rebecca Antle, President ASA4WDC
rantle@comcast.net
520-405-7389



REDDINGTON AREA - THREE PONDS PROPOSAL

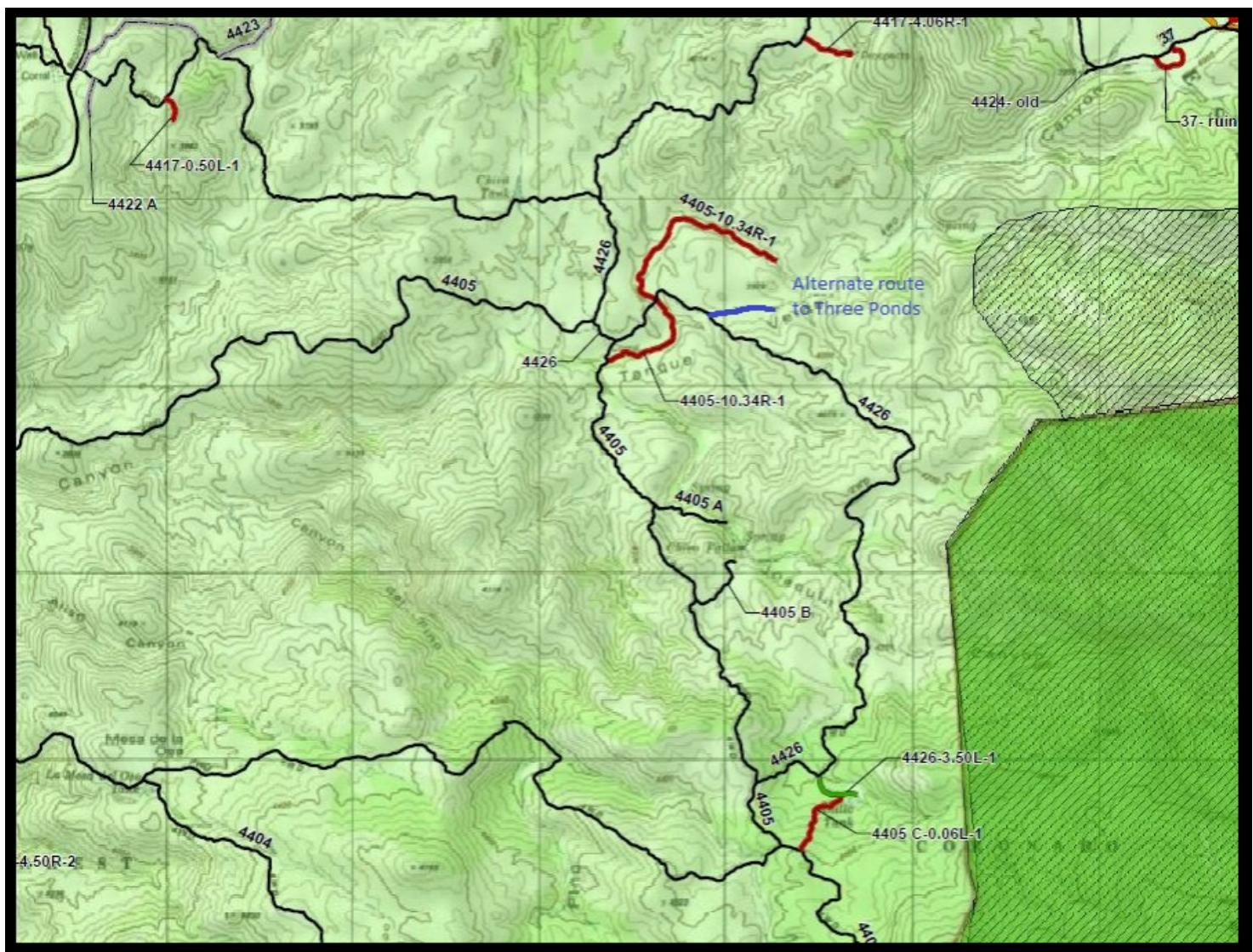
The following is the proposal I made to keep access to the Three Ponds Area in Reddington. This is a very popular area with motorized and non motorized users.

If you close off a "water feature" to people who have always had access to it, there will be more damage as people try to get back to it.

My proposal during the process:

"I would like to propose to the FS that they provide a road to a parking area for "Three Ponds" location off of Route 4426 the east of the 4405-10.34R-1 and 4426 intersection (see attached file Three Ponds). The route could access a parking area off of an actual 4 Wheel Drive road, currently shown on the map but not numbered as a system road. This road is existing and could with little work become an access point into this area.

The closure of this area would be a huge loss to those of us who seek a cooler place to go to when we actually have a little water in Arizona."



CHARLOULEAU GAP - PROPOSAL

The following is the proposal for the Charlouleau Gap area on the Oracle side. We need to secure access to this area, not only for our motorized users but also for the agency in case of fire or another emergency in the area.

This is the proposal that I made during the CAT process:

"As far as road 7705, at the moment there isn't a half mile section of road that connects Dodge Tank to the road 4487. This was a recommendation for the Forest Service to look at. The forest service would have to build a short section of road. We could recommend that in place of the new road that was proposed to be built at Pig Springs, that not many were in favor of, that this one be built instead.

Please see attached files, Dodge Tank 1, 2 and 3.

These jpg's were taken from Google Earth today. The Google maps show more roads than what is on the FS maps. Granted in a couple of places the roads look like washes, but that is where roads were actually built for accessibility. These roads should be shown on the maps whether they are to stay open or not.

This would provide us with access to this area in the future."

Photo #1

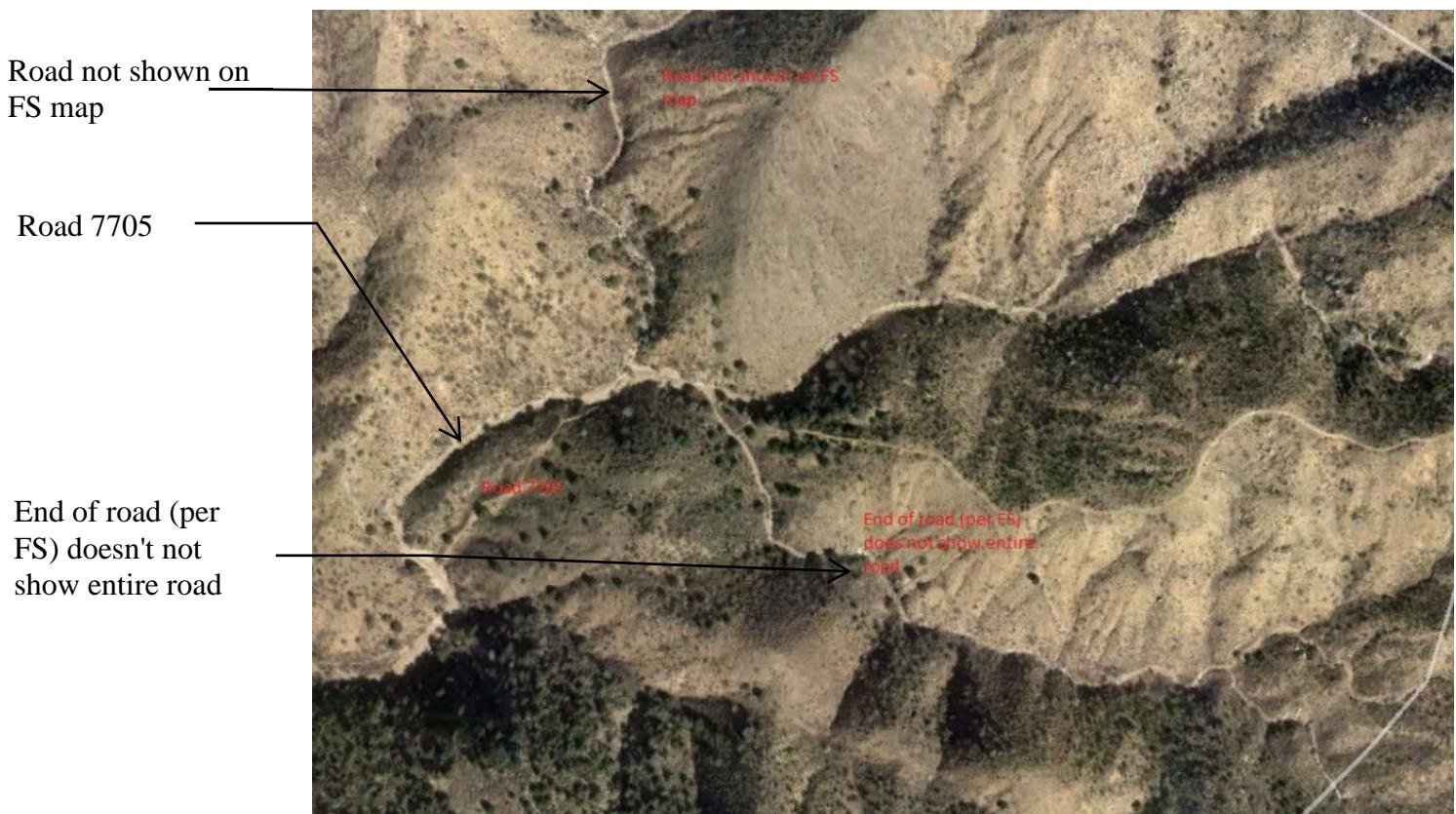
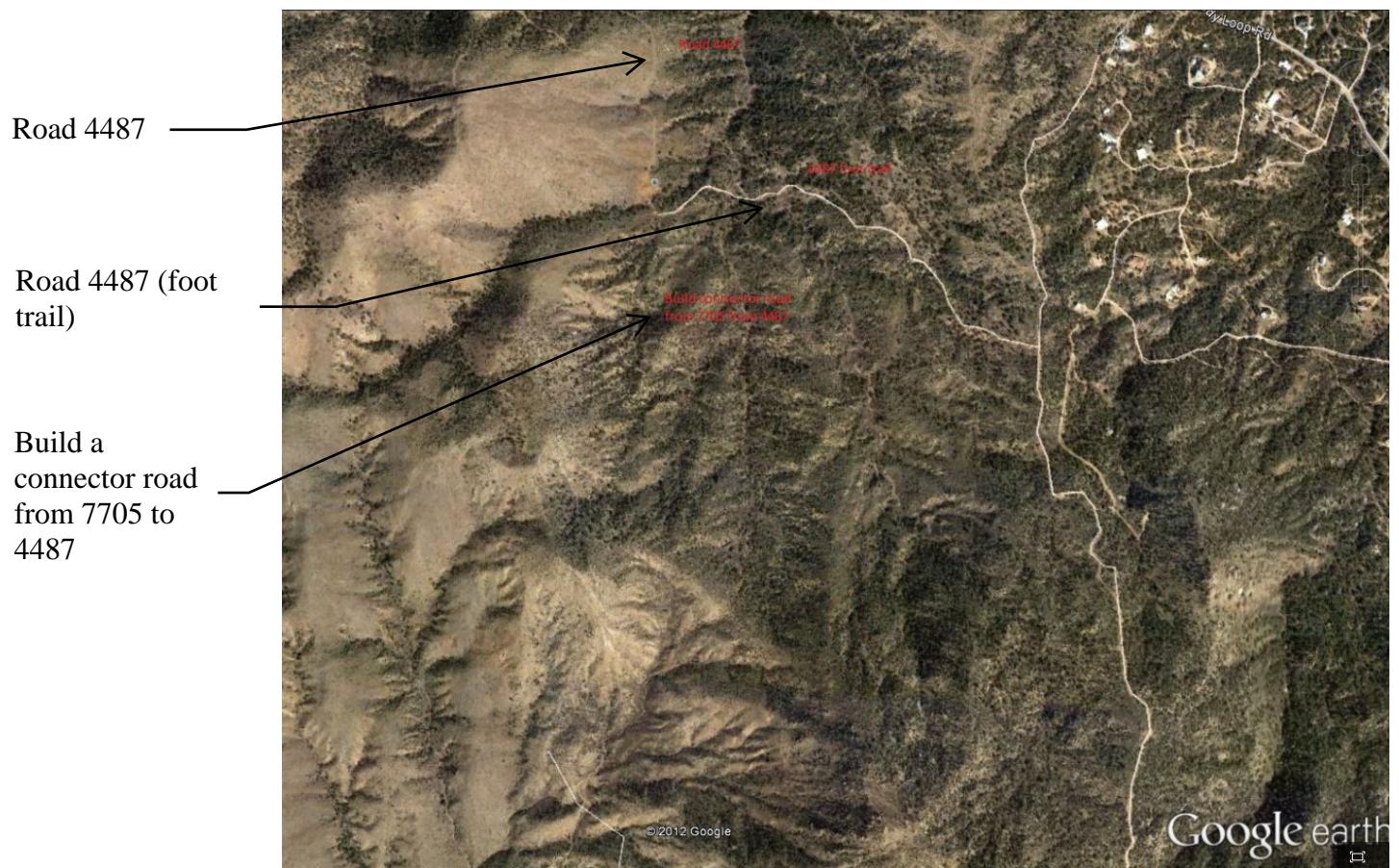


Photo #2



Photo #3



Understanding Arizona State Park's Motorized Vehicle Program

The mission of the Arizona State Park's Off-Highway Vehicle Program is to develop vehicular recreational opportunities and educational programs that promote natural resource protection, social responsibility, and interagency cooperation.

The Arizona Legislature created the OHV Program in 1991. The Legislature set the funding mechanism at 0.55 percent of the annual state motor-fuel tax revenues, which translates into an average of \$1,600,000 annually for the program. This is a direct user fee/user benefit program. The creation of the fund did not create additional taxes, but redirected a small proportion of the existing state license fuel tax at the pump.



Brochures, backcountry travel routes, signage, and recreational facilities on the Coronado National Forest have been maintained, created and/or constructed in part by the Arizona Off-Highway Vehicle Recreation Fund.

For More Information, Contact:

Santa Catalina Ranger District
Coronado National Forest
5700 N. Sabino Canyon Road
Tucson, AZ 85750
Voice and TTY: (520) 749-8700



Or Visit: www.fs.fed.us/r3/coronado/scrd/

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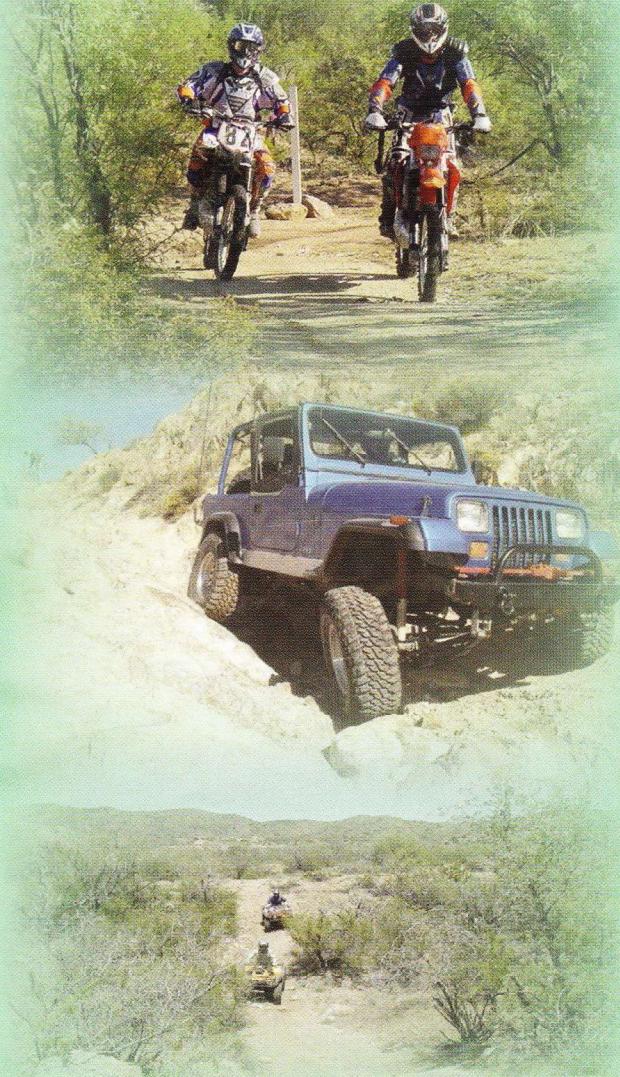
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Redington Pass Backcountry Touring Area

Santa Catalina Ranger District
Coronado National Forest



United States
Department of
Agriculture

PREPARED BY
Forest
Service

Southwestern
Region
RG-R3-05-3

PRODUCED IN COOPERATION WITH
Arizona State Parks