

April 22, 2019

Jim Copeland
District Ranger
Nogales Ranger District
303 Old Tucson Road
Nogales, AZ 85621



RE: Cienega Creek FireScope Project: Preliminary Environmental Assessment

Dear District Ranger Copeland:

The Arizona Trail Association is pleased for the opportunity to comment on the Cienega Creek FireScope Project's Preliminary Environmental Assessment.

The Cienega Creek FireScope Project will have a temporary negative impact but a long term positive impact on approximately 21 miles of the Arizona National Scenic Trail (AZNST) in the project area and the experience of trail users, including hikers, runners, backpackers, mountain bikers and equestrians. The AZNST is an 800-mile National Scenic Trail and State Scenic Trail that is among the greatest natural resources in the nation. It attracts locals and international visitors alike, and has become increasingly popular since its completion in 2011. It is an economic engine for the state of Arizona as well as the 33 Arizona Trail Gateway Communities, including the towns of Patagonia, Sonoita, Sahuarita, and Green Valley.

As the administering agency of the AZNST, the USDA Forest Service has an important responsibility in the protection of the trail. As the nonprofit organization whose mission is to protect, maintain, enhance, promote, and sustain the Arizona Trail as a unique encounter with the land, the Arizona Trail Association (ATA) submits these comments.

The ATA supports the proposed ecosystem thinning and burning treatments that will protect all recreational trails in the Cienega Creek FireScope project within the Santa Rita Ecosystem Management Area. The Arizona National Scenic Trail and other trails are values at risk from uncharacteristic wildfire, and as such, will be protected by the proposed actions of the Cienega Creek FireScope Project.

Notifying the public before forest restoration activities are scheduled is very important to AZNST users. The Draft Environmental Assessment indicates that advanced signage and public outreach would notify the public in advance of potential closures. Sending announcements or media releases directly to the Arizona Trail Association will inform over 10,000 ATA members and supporters, and more importantly, users of the AZNST, about thinning/burning activities or detours along the AZNST. The U.S. Forest Service Administrator for the AZNST should also be consulted and contacted regarding thinning, burning, and detours.

During the 20 years of the project, any detour routes for the AZNST and other trails should be well marked and publicized. When there are any closures of the AZNST, reroutes must be established to provide hikers, bikers, and equestrians safe passage around the closures. Although it "may be difficult to find alternative routes for hikers" (p. 36) and other users, roads or highway rights-of-way can be utilized as a part of a reroute provided there is adequate signage to warn drivers of the presence of AZNST users. Closing the AZNST without a viable scenic detour must be avoided whenever possible, unless there is a significance safety risk to trail users.

The Arizona Trail is a Scenic National Trail. There will be temporary negative impacts during project activities, especially to the trail's scenery, opportunities for solitude, natural quiet, and dark skies. To minimize potential negative impacts, some best practices should be implemented, including the following:

- no motorized vehicles should be used on the AZNST
- the AZNST will not be used as a skid trail, unless the trail shared alignment with an existing road
- crossing the AZNST should be perpendicular and any crossing should be restored to pre-project condition
- when project treatments are within close proximity to the AZNST, considering 'feathering' the treatment so visual effects are more transitional than abrupt
- consider the scenic value of the AZNST in the five treatment units where the trail serves as a boundary
- if the AZNST serves as a fire line, ensure that post treatment includes restoration to pre-project condition

Thank you for your time and effort to review these Preliminary Environmental Assessment comments. The ATA looks forward to this proposed action moving ahead to activities in the forest that will protect the AZNST and, more importantly, the Santa Rita Ecosystem.

Sincerely,

Fred Gaudet
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Arizona Trail Association Board of Directors
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cc:
Laura White, AZNST Administrator, US Forest Service
Matthew Nelson, Executive Director, ATA
Shawn Redfield, Trail Director, ATA

