

January 13, 2020

4FRI Interdisciplinary Team
Coconino National Forest
1824 South Thompson Street
Flagstaff, AZ 86001



RE: 4FRI Rim Country Project: DEIS

The Arizona Trail Association (ATA) appreciates the opportunity to comment on the Four Forest Restoration Initiative Rim Country Project Draft Environmental Impact Statement.

The proposed project will have a temporary negative impact but a long-term positive impact on the Arizona National Scenic Trail (AZT) in the Tonto and Coconino National Forests and the experience of trail users, including hikers, runners, backpackers, mountain bikers, cross country skiers/snowshoers, and equestrians. The AZT is an 800-mile National Scenic Trail and State Scenic Trail that is among the greatest natural resources in the nation. It shares alignment with the Highline National Recreation Trail for 20 miles. The AZT 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 29 Arizona Trail Gateway Communities, including the towns of Strawberry, Pine, Mormon Lake Village, and Flagstaff.

As the administering agency of the AZT, 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 ATA supports the proposed ecosystem thinning and burning treatments that will protect all recreational trails in the 4FRI Rim Country Project, including the AZT. The Arizona National Scenic Trail and other trails are important values at risk, and as such, will likely be protected by the proposed actions of the 4FRI Rim Country Project.

The Design Features, Best Management Practices, and Mitigation for Recreation, Trails, Scenery, and Special Areas listed in Appendix C of the 2019 DEIS are most appropriate and the positive mitigations would protect the recreational values and scenic views for all trails, including the AZT.

Notification to the public when forest restoration activities are scheduled as indicated in RS015, is particularly important for users of the AZT. The District Recreational Planner or trail specialists should “ensure well marked and publicized detour routes for the Arizona Trail” and other trails (p. 568). 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 AZT about thinning/burning activities or detours along the AZT.

Additional design features, best practices, and mitigation specific to the Arizona National Scenic Trail that are addressed in the Draft Environmental Impact Statement and to be included in the final Environmental Impact Statement and Record of Decision are the following from Appendix C:

Avoid using the AZT as a boundary and have minimal marking of trees within the Arizona Trail corridor. Boundaries are to be marked with water based paint. Minimize mechanical treatment within a 1/4 mile of national scenic and recreational trails. Treat the edges of thinning areas to maintain the scenic integrity of the AZT and other historic trails (RS006 p. 563). To be added as a design feature: any trees marked within the corridor of AZT or other National Trails would be also marked with water based paint and that any markings visible within these corridors after ecosystem treatments shall be completely removed from trees.

“National, Historic, and Recreational Trails as well as forest system trails . . . will not be used as temporary roads or skid trails” (RS010(i) p. 566). Any perpendicular trail crossing will be restored, at a minimum, to pre-project conditions. “Crossing of the Arizona Trail will be done sparingly and only if no other alternative exits” (RS010(l) p. 566).

Slash must be treated or removed within 300 feet from the AZT (RS011 (c) p. 567).

There is confusion regarding fire control lines and national scenic, recreational or historic trails in RS004. Section (a) states that fire control lines should avoid “the Arizona Trail unless no other viable alternatives exist...” Later section (d) states that “Control lines . . . should be avoided on these trails under any circumstances unless these trails are co-located on roads” (p. 562). These two sections must be revised to clearly indicate that the Arizona Trail cannot be used as a fire line unless it is co-located on a road.

Jack straw treatment shall not be implemented within 1,000 feet of the AZT or other national trails (RS012 p. 567).

RS010 (l) includes the Arizona Trail national trail administrator as one of the persons coordinating locations (p. 566). The Arizona Trail national trail administrator should also be included in the following design features: RS001; RS006 (h) and (i); RS007; and RS004 (d).

The ATA also recommends adding an additional mitigation: where possible, while implementing proposed treatments, make improvements within recreation sites and along trails. Examples include cleaning up logs and debris from past projects and removing hazard trees and downed timber across trails.

Design Features, Best Management Practices, and Mitigation for Recreation, Trails, Scenery, and Special Areas should be explicitly communicated to all individuals working on the project, not only stated in prescriptions for treatment within contracts, but also communicated to each person involved in thinning and/or burning. Individual workers need to understand the importance of the Arizona National Scenic Trail and how their work can positively or negatively impact this important resource. This is most important since contractors had removed aspens trees within the Arizona Trail corridor in northern Arizona although the contract stated otherwise. The communication to all personnel working on the 4FRI project to protect the Arizona National Scenic Trail, the General Crook Trail, and the Highline Trail should be included in the Record of Decision. The monitoring and evaluation of project activities, as indicated in RS006(h) (p. 564) by Forest Service personnel, the national trail administrator, and ATA staff and volunteers is most important. However, only an annual evaluation and monitoring will not be adequate to protect the values of the Arizona National Scenic Trail. This design feature must be expanded to include continuous monitoring at least once every month.

Thank you for your time and effort to review these comments. The ATA looks forward to this proposed action moving ahead to the Final Environmental Impact Statement, the Record of Decision, and ultimately to activities in the forest that will protect the AZT and more importantly the forest, watersheds, wildlife, trails, and other items. If you have any questions, or would like additional comments, including an in-person meeting, please contact Matthew Nelson, Executive Director (matthew@aztrail.org); or Shawn Redfield, Director of Trail Operations (traildirector@aztrail.org); or me.

Sincerely,

Fred Gaudet
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cc:

Laura White, Arizona National Scenic Trail Administrator, USDA Forest Service
Matthew Nelson, Executive Director, ATA
Shawn Redfield, Director of Trail Operations, ATA

