

Neil Bosworth, Forest Supervisor  
Attn: Plan Revision Team  
Tonto National Forest  
2324 East McDowell Road  
Phoenix, Arizona 85006

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Dear Mr. Bosworth,

The following comments are regarding the Tonto National Forest Draft Revised Forest Plan and associated Draft Environmental Impact Statement. These comments address the planning and management of the Arizona National Scenic Trail (Arizona National Scenic Trail), application of the Scenery Management System, and the Recreation Opportunity Spectrum (ROS) planning framework. This submittal supplements previously submitted Notice of Intent comments (**Attachment A**), Arizona National Scenic Trail Comprehensive Plan scoping comments (**Attachment B**), and are supported by information found in an attached Arizona National Scenic Trail Planning Handbook (**Attachment C**).

#### **Draft Revised Forest Plan**

**Recreation Draft Plan:** *The Draft Plan on page 21 describes that, “The overarching goal for the recreation program is to provide sustainable recreation opportunities for its visitors. Sustainable recreation is defined as the set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations. On the Tonto National Forest, it is a management philosophy that considers the individual and social benefits of recreation, the integrity of the landscapes, environment and resources necessary to provide exceptional recreational opportunities, and the benefits to local communities whose economies are often dependent on outdoor recreation and tourism on public lands.”*

**Comment:** The forest plan should briefly describe how each ROS setting or class is defined by desired conditions and indicators. Forest Service directives describe, “Use the Recreation Opportunity Spectrum (ROS) system and the ROS Users Guide (1982) to delineate, define, and integrate outdoor recreation opportunities in land and resource management planning” (FSM 2311.1).

*“Managing for recreation requires different kinds of data and management concepts than does most other activities. While recreation must have a physical base of land or water, the product—recreation experience—is a personal or social phenomenon. Although the management is resource based, the actual recreational activities are a result of people, their perceptions, wants, and behavior.*

*While the goal of the recreation is to obtain satisfying experiences, the goal of the recreation resource manager becomes one of providing the opportunities for obtaining these experiences. By managing the natural resource settings, and the activities, which occur within it, the manager is providing the opportunities for recreation experiences to take place. Therefore, for both the manager and the*

*recreationist, recreation opportunities can be expressed in terms of three principal components: the activities, the setting, and the experience.*

*For management and conceptual convenience possible mixes or combinations of activities, settings, and probable experience opportunities have been arranged along a spectrum, or continuum. This continuum is called the Recreation Opportunity Spectrum (ROS) and is divided into six classes. The six classes or portions along the continuum, and the accompanying class names have been selected and conventionalized because of their descriptiveness and utility in Land and Resource Management Planning and other management applications. The Recreation Opportunity Spectrum provides a framework for defining the types of outdoor recreation opportunities the public might desire, and identifies that portion of the spectrum a given National Forest might be able to provide.*

*Planning for recreation opportunities using the Recreation Opportunity Spectrum are conducted as part of Land and Resource Management Planning. The recreation input includes factors such as supply and demand, issues and identification of alternative responses to those issues, which the planner must assess in order to develop management area prescriptions designed to assure the appropriate recreation experience through setting and activity management on the Forest...*

*Land and Resource Management Planning assure that National Forest System lands provide a variety of appropriate opportunities for outdoor recreation... Each prescription should contain minimum guidelines and standards to be met as well as directions concerning the type of activities, settings, and experience opportunities to be managed for during the planning time periods... The land and water areas of the Forest are inventoried and mapped by Recreation Opportunity Spectrum class to identify which areas are currently providing what kinds of recreation opportunities. This is done by analyzing the physical, social, and managerial setting components for each area. The characteristics of each of these three components of the setting affect the kind of experience the recreationist most probably realizes from using the area.*

- *PHYSICAL SETTING-The physical setting is defined by the absence or presence of human sights and sounds, size, and the amount of environmental modification caused by human activity.*
- *SIZE OF AREA-Size of area is used as an indicator of the opportunity to experience self-sufficiency as related to the sense of vastness of a relatively undeveloped area. In some settings, application of the remoteness criteria assures the existence of these experience opportunities; in other settings, the remoteness criteria alone do not. Therefore, apply the size criteria to the map or overlay developed using the remoteness criteria to ensure that the appropriate experience opportunities are available. (Most useful for ROS setting inventory.)*
- *EVIDENCE OF HUMANS-evidence of Humans is used as an indicator of the opportunity to recreate in environmental settings having varying degrees of human influence or modification.*
- *SOCIAL SETTING-The social setting reflects the amount and type of contact between individuals or groups. It indicates opportunities for solitude, for interactions with a few selected individuals, or for large group interactions.*

- *MANAGERIAL SETTING-The managerial setting reflects the amount and kind of restrictions placed on people's actions by the administering agency or private landowner which affect recreation opportunities."*

The Forest Service Planning Handbook (FSH 1909.12 – Part 23.23a) addresses recreation resources. *"The Interdisciplinary Team uses the recreation opportunity spectrum to define recreation settings and categorize them into the six distinct classes as the structure to describe recreational settings. At the forest scale, sustainable recreation is derived through the integrated planning process and emerges as the resultant set of desired recreation opportunity spectrum classes. Each setting provides opportunities to engage in activities (motorized, nonmotorized, developed, or dispersed on land, water, and in the air) that result in different experiences and outcomes... The plan must include plan components, including standards or guidelines, to provide for sustainable recreation integrated with other plan components as described in 23.21a. To meet this requirement the plan: a. Must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. This mapping may be based on management areas, geographic areas, designated areas, independent overlay mapping, or any combination of these approaches... Should include specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired recreation opportunity spectrum classes...."*

*"The Forest Plan must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. This mapping may be based on management areas, geographic areas, designated areas, independent overlay mapping, or any combination of these approaches. The plan should include specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired recreation opportunity spectrum classes."* (1982 ROS User Guide, Forest Service)

To meet the Planning Rule analysis requirements of using the *Best Available Scientific Information* and to ensure CEQ requirements for *Methodology and Scientific Accuracy*, ROS plan components with desired conditions, standards, and guidelines must be described in the plan. In addition, Primitive or Semi-Primitive Non-Motorized ROS class "Social Setting" guidance for party size and encounters would meet the NTSA comprehensive planning requirement for addressing carrying capacity in a Forest Plan. The following descriptions present plan components that link specific ROS characteristics to the appropriate ROS class.

**Primitive ROS Setting**

<b>Primitive ROS Class Desired Conditions</b>
Setting: The area is essentially an unmodified natural environment. Interaction between users is very low and evidence of other users is minimal.
Experience: Very high probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk.
Evidence of Humans: Evidence of humans would be un-noticed by an observer wandering through the area. Natural ecological processes such as fire, insects, and disease exist. The area may provide for

wildlife connectivity across landscapes. Primitive ROS settings contain no motorized and mechanized vehicles and there is little probability of seeing other groups. 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.
<b>Primitive ROS Class Standards and Guidelines</b>
Standards: (1) Motor vehicle use is not allowed unless necessary to protect public health and safety or the use is mandated by Federal law and regulation; and (2) Management actions must result in Very High Scenic Integrity.
Guidelines: (1) No new permanent structures should be constructed, since structures may degrade the unmodified character of these landscapes; (2) Less than 6 parties per day encountered on trails and less than 3 parties visible at campsite since an increase in the number of groups may lead to a sense of crowding; (3) Party size limits range between 6 and 12; and (4) No roads, timber harvest, or mineral extraction are allowed in order to protect the remoteness and naturalness of the area.
<b>Primitive ROS Class Suitability of Lands</b>
Suitability: (1) Motorized and mechanized recreation travel are not suitable; and (2) lands are not suitable for timber production.

### **Semi-Primitive Non-Motorized ROS Setting**

<b>Semi-Primitive Non-Motorized ROS Class Desired Conditions</b>
Setting: The area is predominantly a natural-appearing environment where natural ecological processes such as fire, insects, and disease exist. Interaction between users is low, but there is often evidence of other users.
Experience: High probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk.
Evidence of Humans: Natural setting may have subtle modifications that would be noticed but not draw the attention of an observer wandering through the area. The area provides opportunities for exploration, challenge, and self-reliance. The area may contribute to wildlife connectivity corridors. Closed and re-vegetated roads may be present, but are managed to not dominate the landscape or detract from the naturalness of the area. Rustic structures such as signs and footbridges are occasionally present to direct use and/or protect the setting's natural and cultural resources.
<b>Semi-Primitive Non-Motorized ROS Class Standards and Guidelines</b>
Standards: (1) Motor vehicle use is not allowed unless necessary to protect public health and safety or the use is mandated by Federal law and regulation; and (2) Management actions must result in High or Very High Scenic Integrity level; and (3) No new roads may be built.
Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPMN settings; (2) Less than 15 parties per day encountered on trails and less than 6 parties visible at campsite, since an increased in the number of groups may lead to a sense of crowding; (3) Party size limits range between 12 and 18; and (4) Roads may not be constructed.
<b>Semi-Primitive Non-Motorized ROS Class Suitability of Lands</b>
Suitability: (1) Motorized recreation travel is not suitable; and (2) Lands are not suitable for timber production.

### **Semi-Primitive Motorized ROS Setting**

<b>Semi-Primitive Motorized ROS Class Desired Conditions</b>
Setting: The area is predominantly natural-appearing environment. Concentration of users is low, but there is often evidence of other users.
Experience: Moderate probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of woodsman and outdoor skill in an environment that offers a high degree of challenge and risk. Opportunity to have a high degree of interaction with the natural environment. Opportunity to use motorized equipment.
Evidence of Humans: Natural setting may have moderately alterations, but would not draw the attention of motorized observers on trails and primitive roads within the area. The area provides for motorized recreation opportunities in backcountry settings. Vegetation management does not dominate the landscape or detract from the experience of visitors. Visitors challenge themselves as they explore rugged landscapes.
<b>Semi-Primitive Motorized ROS Class Standards and Guidelines</b>
Standards: (1) Management actions must result in at least a Moderate Scenic Integrity level, and (2) Roads may not be constructed.
Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPM settings; (2) Low to moderate contact between parties to protect the social setting, and (3) Vegetation management may range from prescribed fire to limited and restricted timber harvest for the purpose of maintaining or restoring natural vegetative conditions.
<b>Semi-Primitive Motorized ROS Class Suitability of Lands</b>
Suitability: Lands are not suitable for timber production.

### **Roaded Natural ROS Setting**

<b>Roaded Natural ROS Class Desired Conditions</b>
Setting: The area is predominantly natural-appearing environments with moderate evidences of the sights and sounds of human activities. Such evidences usually harmonize with the natural environment. Interaction between users may be low to moderate, but with evidence of other users prevalent. Resource modification and utilization practices evident, but harmonize with the natural environment. Conventional motorized use is provided for in construction standards and design of facilities.
Experience: About equal probability to experience affiliation with other user groups and for isolation from sights and sound of humans. Opportunity to have a high degree of interaction with the natural environment. Challenge and risk opportunities associated with a more primitive type of recreation are not very important. Practice and testing of outdoor skills might be important. Opportunities for both motorized and non-motorized forms of recreation are possible.
Evidence of Humans: Natural settings may have modifications, which range from being easily noticed to strongly dominant to observers within the area. However, from sensitive travel routes and use areas these alternations would remain unnoticed or visually subordinate. 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.

The <b>Roaded Modified subclass</b> includes areas that exhibit evidence of extensive forest management activities that are dominant on the landscape, including having high road densities, heavily logged areas, highly visible mining, oil and gas, wind energy, or other similar uses and activities.
<b>Roaded Natural ROS Class Standards and Guidelines</b>
Standard: Management actions must result in at least a Low Scenic Integrity level.
<b>Roaded Natural ROS Class Suitability of Lands</b>
Suitability: Lands may be suitable for timber production.

**Rural ROS Setting**

<b>Rural ROS Class Desired Conditions</b>
Setting: Area is characterized by substantially modified natural environment. Resource modification and utilization practices are to enhance specific recreation activities and to maintain vegetative cover and soil. Sights and sounds of humans are readily evident, and the interaction between users is often moderate to high. A considerable number of facilities are designed for use by a large number of people. Facilities are often provided for special activities. Moderate densities are provided far away from developed sites. Facilities for intensified motorized use and parking are available.
Experience: Probability for experiencing affiliation with individuals and groups is prevalent as is the convenience of sites and opportunities. These factors are generally more important than the setting of the physical environment. Opportunities for wildland challenges, risk-taking, and testing of outdoor skills are generally unimportant except for specific activities like downhill skiing, for which challenge and risk-taking are important elements.
Evidence of Humans: Natural setting is culturally modified to the point that it is dominant to the sensitive travel route observer. May include intensively managed wildland resource landscapes. Pedestrian or other slow-moving observers are constantly within view of the culturally changed landscape.
<b>Rural ROS Class Suitability of Lands</b>
Suitability: Lands may be suitable for timber production.

**Recreation Draft Plan:** The Draft Plan on page 22 describes recreation standard 01: *“All project-level decisions, implementation activities, and management activities will ensure consistency with Recreation Opportunity Settings (ROS), or current protocol.”*

**Comments:** The standard must be modified to ensure that, *“All project-level decisions, implementation activities, and management activities will ensure consistency with the established Forest Plan Recreation Opportunity Spectrum (ROS) settings.”*

In addition, there should be an explanation of how Primitive and Semi-Primitive Non-Motorized ROS inconsistencies will be managed. For Primitive and SPNM ROS allocations, any existing designated motorized roads, trails, and areas must be managed to minimize their effects on the Primitive and SPNM settings.

The Plan should recognize that timber production, mining, and associated activities are inconsistent with Primitive and Semi-Primitive Non-Motorized ROS classes, which are ROS desired settings for the Arizona National Scenic Trail corridor. Primitive and SPNM settings are not suitable for timber production or



**Scenery Draft Plan:** The Draft Plan on page 52 states that, “*Scenery is the arrangement of the natural elements of the landscape along with components of the built environment. Scenery varies depending on existing natural features including vegetation, water features, landforms and geology, cultural features, and human alterations (e.g., buildings, structures, manipulations of the land or vegetation). The Tonto National Forest serves as a scenic backdrop for many local communities in central Arizona. This scenic quality defines the region’s character and contributes to the positive experiences people seek on the Forest. In most National Forest settings, managing the Scenery is important to protect the naturalness of the existing landscape character. Scenic values and characteristics are important in creating a sense of place for local residents and visitors alike.*”

**Comment:** The revised forest plan cannot delay acting on the scenery management requirements as described in FSH 1909.12 22.2 and 23.23f. The revised plan must abandon the use of the Visual Management System and instead adopt the Scenery Management System for the purpose of Forest Plan allocations.

**National Trails Draft Plan:** The Draft Plan beginning on page 148 describes that, “*The Arizona National Scenic trail 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. 90-543) to designate the Arizona Trail as a national scenic trail. The Arizona National Scenic trail corridor is defined as approximately ½ mile from the centerline of the trail. The Tonto National Forest manages about 200 miles of the Arizona National Scenic trail on the Globe, Mesa, Tonto Basin, and Payson Ranger Districts....*”

The proposed plan components do not protect the nature and purposes of the Arizona National Scenic Trail. The following are brief edits/insertions that display and describe some of the issues with the Draft Forest Plan Arizona NST plan components. Insertions suggest possible edits that may improve the proposed direction.

Desired Conditions (NTMA-DC)

07 The Arizona National Scenic Trail *travel route* is a well-defined National Forest System trail that provides for high-quality, primitive hiking and equestrian opportunities, and other compatible non-motorized trail activities, in a highly scenic setting ~~traversing the State of Arizona~~. The significant scenic, natural, historic, and cultural resources *within along the National Trail Management Corridor corridor* are conserved. The trail provides visitors with expansive views of the natural landscapes.

*Interaction between users is very low and evidence of other users is minimal. Semi-Primitive Non-Motorized or Primitive ROS settings are protected or restored.*

08 Viewsheds from the Arizona National Scenic Trail *travel route* have high visual qualities. *Scenic integrity objectives are High and Very High.* The foreground of the trail (~~up to 0.5 miles on either side~~) is natural-appearing. The potential to view wildlife is high and evidence of ecological processes such as fire, insects, and diseases exist.

09 The Arizona National Scenic trail has appropriate trailheads and access points that provide various opportunities to select the type of terrain, Scenery, and trail length (ranging from long distance to day use) that best provide for compatible outdoor recreation experiences.

- a. ~~Wild and remote backcountry segments of the Arizona National Scenic trail provide opportunities for solitude, immersion in natural landscapes, and primitive outdoor recreation.~~
- b. ~~Front-country and easily accessible trail segments complement local community interests and needs and help contribute to their sense of place.~~

#### Standards (NTMA-S)

- 03 ~~Motorized use shall not be allowed on newly constructed segments of the Arizona National Scenic trail.~~
- 04 Motorized events and activities shall not be authorized under special use permit on any section of the Arizona National Scenic trail or anywhere crossing the trail.
- 05 Sales or extraction of common variety minerals (e.g., limestone and gravel) shall not be authorized within the Arizona National Scenic trail corridor.

#### Guidelines (NTMA-G)

- 10 ~~If management activities result in short-term impacts to the visual quality along the Arizona National Scenic trail, mitigation measures should be included (e.g., screening, feathering, and other Scenery management techniques) at key locations (e.g., vistas) within and adjacent to the trail corridor.~~
- 11 The minimum trail facilities necessary to accommodate the amount and types of use anticipated on any given segment along the Arizona National Scenic trail should be provided to protect resource values and for health and safety (not for the purpose of promoting user comfort) to preserve or promote a natural-appearing setting.
- 12 Linear utilities and rights-of-way should not be constructed over national trails. Where unavoidable, these should be limited to a single Arizona National Scenic trail crossing per special use authorization to maintain the integrity of the trail corridor and values for which the Arizona National Scenic trail was designated.
- 13 ~~In order to promote a naturally appearing and non-motorized setting, the Arizona National Scenic trail should not be permanently relocated onto routes open to motor vehicle use.~~
- 14 Wildland fire in the foreground (if visible, up to 0.5 miles) of the Arizona National Scenic trail should be managed using Minimum Impact Suppression Tactics (MIST) or other tactics appropriate to protect and incorporate the values of the Arizona National Scenic trail. Heavy equipment fire line constructions (e.g., dozer lines) should not be used within the Arizona National Scenic trail corridor unless necessary for emergency protection of life and property.
- 15 ~~Best available science should be used in lieu of the comprehensive plan if the plan is out of date with science.~~
- 16 ~~To protect or enhance the scenic qualities of the Arizona National Scenic trail, management activities should be consistent with Visual quality Objectives of Preservation or Retention within the foreground of the trail (up to 0.5 miles either side).~~
- 17 ~~In order to promote a naturally appearing setting and avoid visual, aural, and resource."~~

The following table describe plan components recommendations for Arizona National Scenic Trail National Trail Management Corridor. The boundary of the National Scenic Trail management corridor should follow topographic features to the extent possible, while being at least one-half mile wide on each side of the established NST travel route where there is management discretion. This is based on ROS criteria that identify remoteness for a Semi-Primitive Non-Motorized setting as, "An area designated at least 1/2-mile but not further than 3 miles from all roads, railroads or trails with motorized use; can include the existence of primitive roads if closed to motorized use." The FS Scenery Management System identifies that the middleground begins at 1/2-mile of the travel route.

**Arizona NST LMP MA Desired Conditions**

Descriptions
The NST provides for high-quality scenic, non-motorized recreation opportunities and conserves natural, historic, and cultural resources along the NST corridor (Arizona NST nature and purposes).
The area is predominantly a natural-appearing or naturally evolving landscape. Scenic integrity objectives are High and Very High.
Interaction between users is very low and evidence of other users is minimal. Semi-Primitive Non-Motorized or Primitive ROS settings are protected or restored.
The management area provides for natural ecological processes where the composition, structure, functions, and connectivity function normally.
The NST linear landscape provides connectivity for people and wildlife.

**NST LMP MA Objectives**

Descriptions
Complete an NST travel route through the MA within five years. [Example of proposed and possible actions.]

**NST LMP MA Standards or Guidelines Practices**

<b>Scenery Management</b>
Manage of the Arizona NST travelway as a concern level 1 travel route. Resource management actions must meet a Scenic Integrity Level of Very High or High. (Forest-wide Plan Component)
<b>Recreation Setting Management</b>
Standard: Resource management actions and allowed uses must be compatible with maintaining or restoring Primitive or Semi-Primitive Non-Motorized ROS class settings. Accepted Semi-Primitive Non-Motorized ROS class inconsistencies include existing: (1) NFS roads, (2) state and county road right-of-ways, and (3) utility right-of-ways. Manage ROS class inconsistencies with the objective of minimizing effects on the NST nature and purposes.
Standard: The NST must be managed to provide high-quality scenic, non-motorized recreation opportunities
<b>Motor Vehicle Use by the General Public</b>
Standard: Motor vehicle use by the general public is prohibited on the NST travel route unless that use: <ul style="list-style-type: none"> <li>▪ Is necessary to meet emergencies;</li> <li>▪ Is necessary to enable adjacent landowners or those with valid outstanding rights to have reasonable access to their lands or rights;</li> </ul>

<ul style="list-style-type: none"> <li>▪ Is for the purpose of allowing private landowners who have agreed to include their lands in the NST by cooperative agreement to use or cross those lands or adjacent lands from time to time in accordance with Forest Service regulations; or</li> <li>▪ Is on a motor vehicle route that crosses the NST, as long as that use will not substantially interfere with the nature and purposes of the NST.</li> </ul>
<b>Special Uses Management</b>
Activities, uses, and events that would require a permit must not be authorized unless the activity, use, or event is compatible with the nature and purposes of an NST.
<b>Minerals Management</b>
Mineral leases are to include stipulations for no surface occupancy.
Permits for the removal of mineral materials are not to be issued.
Mineral withdrawals should be enacted in areas with a history of locatable mineral findings. Locatable mineral operations and activities and must not be allowed to substantially degrade the Arizona NST nature and purposes.
<b>Vegetation Management</b>
Vegetation may be managed to enhance NST values, such as to provide vistas to view surrounding landscapes and to conserve natural resources.
Standard: Timber harvests may only be used for maintaining or making progress toward the Management Area desired conditions.
Guideline: Vegetation may be managed to maintain or improve threatened and endangered species, proposed and candidate species, and species of conservation concern habitat. The purpose of this guidance is to recognize the conservation purposes of the NST.
Rangelands and riparian areas where affected by livestock use must be maintained in a Proper Functioning Condition.
<b>Cultural and Historic Resources Management</b>
Protect cultural and historic resources. Interpret National Historic Trails and sites.
<b>Lands Acquisition</b>
Provide for land acquisitions to protect the nature and purposes of the National Trail. Prohibit land disposals.
<b>Travel Routes</b>
Segments of an NST travel route should fall into Trail Class 2 or 3 and have a Designed Use of Pack and Saddle Stock, except where a substantial safety or resource concern exists, the travel route may have a Designed Use of Hiker/Pedestrian (FSH 2309.18).
The NST travel route may not be used for a livestock driveway.
<b>Fire Suppression</b>
Fire suppression activities should apply the Minimum Impact Suppression Tactics Implementation Guidelines.
<b>Motor Vehicle Use</b>
Motor vehicle use by the general public is prohibited unless that use: <ul style="list-style-type: none"> <li>a. Is necessary to meet emergencies;</li> <li>b. Is necessary to enable adjacent landowners or those with valid outstanding rights to have reasonable access to their lands or rights;</li> <li>c. Is for the purpose of allowing private landowners who have agreed to include their lands in the NST by cooperative agreement to use or cross those lands or adjacent lands from time to time in</li> </ul>

accordance with Forest Service regulations; or d. Is on a motor vehicle route that crosses the NST, as long as that use will not substantially interfere with the nature and purposes of the NST.
<b>Other Uses Considerations</b>
Other uses that could conflict with the nature and purposes of an NST may be allowed only where there is a determination that the other use would not substantially interfere with the nature and purposes of an NST (16 USC 1246(c)).
National Scenic Trail corridors might overlap with Wilderness and Wild and Scenic River designations. Where this occurs, the most restrictive measures control.
<b>Suitability of Lands</b>
Lands are not suitable for timber production.

**Timber Production Suitability Analysis Draft Plan:** The Draft Plan on page 48 describes that, *“Timber production may only occur on National Forest System lands that are identified as being suitable for timber production. Timber harvest may occur on all National Forest System lands where not specifically prohibited (e.g., designated wilderness), including those not suited for timber production. These are lands where periodic timber harvest is unpredictable, unnecessary, or undesirable to achieve management goals, but harvest is permitted where necessary to achieve plan or project-level resource protection objectives...”*

**Comment:** The National Trails System Act describes promoting the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation. National Recreation Trails provide a variety of outdoor recreation uses in or reasonably accessible to urban areas. National Scenic Trails are located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. National Historic Trails shall have as their purpose the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment. The purpose of timber production is the purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use, which is in stark contrast and clearly incompatible with protecting the purposes for which National Trails are established.

Timber production is not compatible with achieving the Arizona National Scenic Trail nature and purposes desired conditions established by the Comprehensive Plan. The NTSA, Section 7(c), restricts the removal of vegetation to only those actions that would not substantially interfere with the nature and purposes of a National Scenic or Historic Trail. The Plan should recognize that timber production, mining, and associated activities are inconsistent with Primitive and Semi-Primitive ROS classes, where Primitive and SPNM settings are the appropriate ROS allocations for an Arizona National Scenic Trail management corridor/rights-of-way.

Managing the Arizona National Scenic Trail corridor for Roaded Natural/Modified and Semi-Primitive Motorized ROS settings, timber production, and mining purposes would lead to management actions that substantially interfere with the nature and purposes of the Arizona National Scenic Trail, which is not allowed by the National Trails System Act. In areas of timber production, reoccurring harvesting, stand tending, road construction and reconstruction, Arizona National Scenic Trail travel route closures, and other activities are incompatible with desired ROS settings and Scenic Integrity Objectives. The

lasting effects of an activity (roads, timber harvest) as well as short-term effects (logging trucks, noise) degrade Arizona National Scenic Trail values. The Arizona National Scenic Trail rights-of-way is not suitable for timber production as described in 36 CFR 219.11(a)(i) and (iii). In addition, the Arizona NST is not suitable for mining operations and activities.

**Monitoring and Evaluation Draft Plan:** The Draft Plan on page 159 describes that, *“Under the 2012 Planning Rule (36 CFR 219.12(a)(5), monitoring consists of two elements: the plan monitoring program and broader-scale monitoring strategies (FSH 1909.12-2015-1). Together, these should enable the responsible official to determine if a change in plan components or other plan content that guide management of resources on the plan area may be needed...”*

**Comment:** Forest Plans and Resource Management Plans must monitor progress toward meeting desired conditions and objectives for National Scenic Trails. Specific to the Forest Service – Has plan components provided for desired natural-appearing or naturally evolving landscapes? Indicator: Acres meeting the high or very high scenic integrity levels. Are the current recreation settings providing for or moving toward desired ROS classes? Indicator: ROS indicators consistency with desired ROS class. Have natural ecological processes persisted or been restored? Indicator: Acres of fires managed for resource objectives within the Arizona National Scenic Trail corridor. Is the Arizona National Scenic Trail travel route maintained to standard? Indicator: Miles of trails maintained annually. Have the effects from any uses or activities been as predicted that were allowed due to a not likely to substantially interfere with the nature and purposes determination (NTSA, Section 7(c))? Indicator: Monitoring plan as described in the other uses or activities approving decision document.

#### **Draft Environmental Impact Statement**

The DEIS does not address the expected effects of each alternative on Arizona NST nature and purposes values as measured through Recreation Opportunity Spectrum and Scenery Management System planning frameworks, which are the accepted Best Available Science and Methodology and Scientific Accuracy analysis planning systems.

The DEIS must disclose effects of the proposed action and alternatives on scenic integrity, ROS class conditions, and carrying capacities. Utilizing the ROS and Scenery Management System will help ensure that NEPA assessments are systematic and accurately describe the affected environment and expected outcomes from each alternative. The DEIS should recognize that management direction for Semi-Primitive Motorized, Roaded Natural, Rural, and Urban ROS classes allow uses that would substantially interfere with the nature and purposes of a National Scenic Trail if the allocation desired conditions are realized.

The DEIS does not describe the effects on timber production, vegetation management, range management, recreation management, wildlife management, wilderness, recommended wilderness, mining, and fire management of managing the Arizona NST corridor to provide for the nature and purposes of this National Scenic Trail.

A Supplemental DEIS must address several important planning steps and NEPA processes. The affected environment must describe the environment of the Arizona NST rights-of-way/corridor to be affected or created by the alternatives under consideration. What is the degree to which current management

direction is protecting the values for which each National Trail was designated, including in part protecting cultural landscapes, recreation settings, scenic integrity, and addressing the conservation purposes of the Arizona NST?

The establishment of Primitive and Semi-Primitive Non-Motorized ROS classes and high and very high scenic integrity allocations would normally protect the nature and purposes (values) of a National Scenic Trail. A Supplemental DEIS effects analysis must include cross-tabular tables that explore and disclose the relationship between (1) the proposed Arizona NST travel route location and management corridor/rights-of-way extent and (2) the intersection and overlap with the proposed ROS classes and Scenic Integrity Objectives allocations. For each alternative, the analysis of environmental consequences needs to address how the land management planning decisions will achieve desired conditions, including providing for the nature and purposes of the National Trails, including protecting the National Trail resources, qualities, values, and associated settings. Land use planning associated NEPA must (1) rigorously explore and objectively evaluate all reasonable alternatives, and (2) take a hard look at the effects of the alternatives.

A Supplemental DEIS must address the failure of the Forest Service to provide for the protection of the nature and purposes of the Arizona NST on other National Forest System lands that the designated National Scenic Trail traverses. The Forest Service has failed to prepare and approve the comprehensive planning requirements of the National Trails System Act for the Arizona National Scenic Trail, which has allowed for development activities and other uses along this National Scenic Trail that substantially degrade National Scenic Trail values. When a federal agency does not make an "overt act," no NEPA requirement to prepare an Environmental Impact Statement (EIS) attaches. However, if some agency action was mandated under a separate statute in relation to that activity but the action was not taken, NEPA does attach and the Administrative Procedure Act applies (40 CFR 1508.18 and 5 U.S.C. 706). The NTSA presents an independent planning requirement to prepare and implement a comprehensive plan including identifying carrying capacity, select the rights-of-way, and in general establish management direction that provides for the nature and purposes values of the Arizona NST.

The Forest Supervisor must correct the DEIS deficiencies and release a revised Draft Plan and Supplemental DEIS to further address the requirements of the National Trails System Act, NFMA, and NEPA CEQ regulations as found in 40 CFR Parts 1500-1508. Specifically, a Supplemental DEIS must evaluate an alternative that fully addresses the requirements of FSH 1909.12 – Parts 22.2, 23.23a, 23.23f, and 24.3.

### **Summary**

The draft plan must be revised to provide for the integrated management of congressionally designated areas and to clarify and strengthen the direction presented. National Scenic and Historic Trails must be managed in accordance with the National Trails System Act of 1968, as amended. The Arizona NST must be protected to provide for the nature and purposes of this National Scenic Trail. Primitive and Semi-Primitive Non-Motorized ROS settings should provide for the nature and purposes of the Arizona NST. Semi-Primitive Motorized and Roded Natural ROS allocations do not protect Arizona NST values. Other uses that could conflict with the nature and purposes of the Arizona NST may be allowed only where

there is a determination that the other use would not substantially interfere with the nature and purposes of the Arizona NST.

The extent of the established Arizona NST Management Area must also be based on compatible Recreation Opportunity Spectrum allocations along the Arizona NST travel route. If the proposed plan components are not modified to reflect a desirable Primitive or Semi-Primitive Non-Motorized ROS setting along the Arizona NST than a new alternative should be developed to protect the Arizona NST setting. This ROS assessment and recommendation is based in part on recreation research and handbooks including information found in (1) The Recreation Opportunity Spectrum: A Framework for Planning, Management, and Research, General Technical Report PNW-98 by Roger Clark and George Stankey; (2) ROS Users Guide (U.S. Department of Agriculture, Forest Service. ROS Users Guide. Washington, DC: U.S. Department of Agriculture, Forest Service; 1982 (FSM 2311.1); (3) Recreation Opportunity Setting as a Management Tool Technical Guide by Warren Bacon, George Stankey, and Greg Warren (**Attachment D**); and (4) Landscape Aesthetics, A Handbook for Scenery Management, Agricultural Handbook Number 701.

A Supplemental DEIS must address several important planning steps and NEPA processes. The Forest Supervisor should correct the DEIS deficiencies and release a revised Draft Plan and Supplemental DEIS to further address the requirements of the National Trails System Act, NFMA, and NEPA CEQ regulations as found in 40 CFR Parts 1500-1508. Land use planning associated NEPA must (1) rigorously explore and objectively evaluate all reasonable alternatives, and (2) take a hard look at the effects of the alternatives and address the cumulative effects of not addressing the comprehensive planning requirements of the National Trails System Act for the Arizona NST on National Forest System and other Federal lands in the State of Arizona.

The glossary of the Forest Plans and EIS should be consistent and expanded to include description or definitions of the National Trails System Act, National Scenic Trail, National Scenic and Historic Trail nature and purposes, and Scenic Integrity. Recreation Opportunity Spectrum class definitions need to be expanded to add descriptions of Access, Remoteness, Non-Recreation Uses, Visitor Management, Social Encounters, and Visitor Impacts setting indicators. The Forest Plan glossary should include other descriptors for clarity and recommend adding those definitions and terms that are found in the attached Arizona NST Planning Handbook.

Thank you for considering these comments.

Greg Warren

Attachment A – Tonto Forest Plan Revision NOI Comments

Attachment B – Arizona NST Comprehensive Plan Scoping Comments

Attachment C – Arizona NST Planning Handbook

Attachment D – Recreation Opportunity Setting as a Management Tool Technical Guide