Michiko Martin

Regional Forester, Southwestern Region

Brian Poturalski

AZ NST Administrator

USDA Forest Service

333 Broadway SE

Albuquerque, NM 87102

 3/19/2024

Re: Arizona NST Draft Comprehensive Plan and Environmental Assessment

Dear Regional Forester Martin and Administrator Poturalski:

These are the comments of the Partnership for the National Trails System (PNTS or Partnership), the overarching 501(c)(3) coalition that represents the non-profit primary private partners of the National Trails System, as designated by Congress through the National Trails System Act (NTSA or Act) regarding the draft comprehensive plan (Plan) for the Arizona National Scenic Trail (AZNST). PNTS and our member organizations work closely with the Congressionally designated administering agencies for these trails as well as a wide array of other federal, state, and local agencies and non-profit partners to build, maintain, and manage these trails as set out in the NTSA. As an example, in 2023 alone the Partnership’s member organizations managed 17,106 volunteers to produce 718,127 hours of volunteer work on these trails and raised $56,544,000 in private contributions to support the National Scenic and Historic Trails.

While these comments are offered on behalf of the Partnership for the National Trails System, I should also introduce myself. I have been working as a professional on the National Trails System for 43 years. First as a Regional Representative for the Appalachian Trail Conference from 1980 to 2001, where I was involved with the production of the AT Comp Plan, then as the Director of Trail Management and Protection for the Pacific Northwest Trail Association and worked toward the PNT’s eventual designation as a National Scenic Trail. I finished my full-time career as the Director of Trail Operations of the Pacific Crest Trail Association, after 15 years, in 2018. Since then, I have served in a professional role for PNTS, PCTA and PNTA as senior consultant. I served as a member of the PNT Federal Advisory Council for its entire existence and was deeply involved in the development of the PNT Comprehensive Plan, signed in December of 2023.

After over 40 years of involvement in the development and use of NST Comprehensive Plans, I am well aware of the importance of clear and thorough treatment of the subjects that are essential for the proper management and protection of a National Scenic Trail. After working directly with agency professionals , primarily in the US Forest Service, at all levels of decision making for all that time, I am particularly aware of the need for direction that is easy to use, and unambiguous as they strive for best management of the lands under their care.

What follows are substantive comments which include suggested revised language, *which will appear in italics*. There are a few spots where we have included edits for grammar, as this is a part of clarity, and which are pointed out with the label **EDIT**. Page numbers in the response refer to the page numbers printed in the draft plan unless otherwise noted. As a long-term partner with the Forest Service, we stand ready to work with our agency partners to improve on this plan draft and encourage those working on potential changes to engage us directly to produce the best result. Comments are offered, primarily as the relevant material appears in the draft.

**This is a draft of an important document that is filled with critical direction. There is a great deal in the draft that is essential for proper management of the AZNST and is well written and presented. With the exception of a few areas where direction is particularly critical, please assume that materials that are not specifically addressed in these comments have been carefully reviewed and we are recommending their inclusion as they currently appear.**

**Overall comments regarding nomenclature**: It is important in this document that nomenclature be clear. There are currently important definitions included in the document for the terms trail right-of-way, trail planning corridor and trail management corridor. In various locations in the plan the term “trail corridor” is used, which is less than clear and should be replaced with either *trail management* or *trail planning corridor*. In addition, the Forest Service uses the term National Scenic Trail to include the lands surrounding the physical built trail facility. The notable reference is found in the Forest Planning Rule and Directives which define National Scenic and Historic Trails as “Congressionally Designated Areas”. To provide clarity, When the term “trail” or AZNST are used they should refer to both the physical built facility, and the trail management corridor as an integrated whole. When referring to just the built facility the clear term would be *trail tread* or *trail travelway*. A complete review of the document for correct use of all these terms is important. The intended use of terms should be defined at the beginning of Chapter 1. This should include a reference to the definition of key terms in Chapter 4. Once defined the terms should be used consistently throughout the document.

**Chapter1**

“National Trails System Act of 1968” (p. 4-5)

Please correct the references provided in the first line. The original 1968 Act and the amendment listed (PL111-11) are not the only legislation that pertains to the AZNST. Major changes to the Act were added in 1978 and minor changes have occurred since, many of which apply directly to the AZT. I believe that there are additional changes since the designating amendment which also apply. More amendments may occur in the future, so it best to simply refer to the *National Trails System Act as amended (NTSA).*

It would also be useful to include a copy of the NTSA as an appendix with other important direction as an appendix to the plan, or at least provide a link to the Act in this section.

“Executive Order (EO) 13195” (p. 5)

Given the relative obscurity of this direction it would be useful to provide a copy in an appendix of such documents.

“Other Federal Laws, Regulations…” (p. 5-6)

Since Forest Plans are an important next step in planning for National Scenic Trails it is important to include a reference to the sections of the Forest Planning Rule and Directives that apply with a reference to their location in the Forest Service Manual (FSH 1909.12) since that is an additional source of direction.

**Relationship between the Comprehensive Plan…**

Proposed change (p.6) “a **land management plan** addresses management of the land (including *the trail tread, trail management area and adjacent lands*) within the area where the land management applies.

The proposal above is indicative of the clarity of terms that should occur in the plan.

“Bureau of Land Management Resource Management Plans”

Proposed addition (p.7) In the second paragraph of this section, there should be a reference in the text or as an additional footnote that links the BLM term “national scenic trail corridor” to the term used in this plan – trail management corridor, for clarity.

Proposed change (p.7) In the last sentence of this section there is a muddled reference to the role of the US Forest Service as the administering agency for the AZNST in planning. The direction should be: *As the administering agency for the AZNST, the BLM will coordinate with the US Forest Service during land use planning that involves the AZNST.* This is consistent with both the NTSA and BLM policy in their manual as referenced in this section and the role of the Forest Service as presented in Chapter 2 of this plan.

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“National Park Service Foundation Documents and *General* Management Plans” (Note proposed change above – General Management Plans are a specific construct in law)

This section lacks the laws and legal requirements that appear in the other agency sections that guide NPS planning.

 Again, the last sentence is muddled regarding the USFS role in planning. and should be replaced with: *As the administering agency for the AZNST, the NPS will coordinate with the US Forest Service during land use planning that involves the AZNST.* This is consistent with the NTSA and the role of the Forest Service as presented in Chapter 2 of this plan.

**Other Designated Areas**

Proposed addition (p. 8) first paragraph of this section

In addition to direction regarding compatibility of ANST management with direction for other designated areas, there should be direction regarding the compatibility of management of these areas, on federal lands, with the designation of and direction for the AZNST found in this plan and land management plans. Here is proposed language: *Management of other designated areas on federal lands will be compatible with direction for the AZNST found in this Comprehensive Plan and agency land management plans. When in doubt, the more restrictive direction will apply.*

**Chapter 2**

Proposed change (p. 17) **State and Other Federal Agencies**

The second paragraph in this section contains an inappropriate description of their role as agencies and should be rewritten as follows: State and Federal agencies are responsible for the management of sections of the AZNST that cross *the lands that they are assigned to manage.*

To be succinct, the land does not belong to the agencies.

Proposed clarification (p.19) Arizona Trail Association

The most common term for organizations like Arizona Trail Association, which make up the membership of the Partnership for the National Trails System, is ***primary private partner***. Even the term non-profit is dated and usually characterized as “not for profit”. We would recommend the use of the former term to describe ATA’s role with the agency.

**Chapter 3**

(p. 20 – 21) The description of the sources of direction regarding the Nature and Purposes of National Scenic Trails is critical for agency decision makers to use in making land management decisions. Any omission of the language quoted in this section of the plan will be met with stiff opposition from the National Trails community.

(p. 21) **Nature and Purposes**

These statements are the heart of this plan. Because the NTSA has specific requirements regarding the nature and purposes for which the trail was designated, we would suggest a careful review of these statements to assure that all the critical factors are included.

Proposed change (p.22) Trail-wide Objectives eighth bullet reword for clarity as: Maintain *for open and safe public use,* the continuous route for the AZNST.

(p.24) **Managed Uses**

The name of this section and the term used to describe the uses is weak and can lead to future problems. The term managed uses is not one that recognizes that the uses addressed are the uses and experiences that are of highest priorities when making management decisions along the AZT. The correct term to use is *Primary Uses*. This conveys that they are more important when making such decisions.

Significant Natural, Cultural, and Historic Resources to be Preserved (p.26 – 28)

This section lacks inclusion of significant resources for which the AZNST was designated, and which are, critical to all National Scenic Trails. The first is scenery (this is after all a National SCENIC Trail) which is paid homage to in scattered reference throughout the draft plan, but which is not addressed adequately and cohesively in the plan. It should be the first item in this section of the plan.

The second resource is the diverse ecological communities of the lands through which the AZT passes. Including fish and wildlife without the larger integrated ecosystems within which they thrive seems to fly in the face of the priorities and perspectives that the Forest Service and other federal agencies embrace nationally.

Last that I will propose is the lands that the trail traverses that provide wilderness and backcountry experiences and experiences in a primarily natural setting. This is related to scenery but also addresses perceived separation from motorized travel and the ability to immerse the user in nature through the exclusion of factors that distract them from that experience.

All three of these resources are included in the Pacific Northwest NST Comprehensive plan and seem to have been left out of this plan intentionally as if they were not significant on the AZNST. I would suggest that it would be easiest to adapt the form in the PNNST Comp Plan to the details of resources along the AZT for inclusion here. Failure to address these three significant resources would fail to comply with the requirements of the NTSA.

**Chapter 4**

(p. 40) **Recommended National Trail Planning Corridor Width**

Proposed change – paragraph 2, line 6 - change “…recommended 1-mile width…” to …”*recommended 1-mile minimum width*…”

Proposed addition – paragraph 3. 1st line – Add to the end of the first sentence, “…can vary across the trail *to a distance of more than a mile if necessary to preserve the resources for which the AZNST was established*.”

(p.45 – 47) **Optimal Location Review**

(p. 45) OLR team composition – It worries me that one of the mandated members of the team is a landscape architect. While it is clear that an LA would enhance the ability of the team to consider scenery in making location decisions, it is our impression that current agency staffing is inadequate to provide such staffing on a regular basis. It would be best to include such staffing in the paragraph below the bulleted list, rather than in the list.

While it may be useful to gather information on land ownership from lands and realty specialists as a part of the OLR, inclusion of these specialists in the OLR team is inappropriate given the nature of the process.

(p. 46) first paragraph – Since the OLR process is usually carried out at the unit and local levels, it seems that confirmation of the OLR team composition would be done at the unit (e.g.: forest) or local (e.g.: district) level, rather than at the regional level and we would recommend that this delegation be made in this plan.

**Chapter 5**

**Trail Location and Design**

Proposed change (p.49) After reviewing the entire content under this heading, it seems clear that the Desired Condition and Management Practices listed in the section (the preponderance of which are excellent) range far beyond Trail Location and Design. We would propose that either the title of this section be expanded to ***Trail, Location, Design and Management*** or that an additional category of Trail and Land Management be instituted, and the Desired Conditions and Management Practices be divided among the two sections appropriately. Parsing out items which may reasonably be included in either argues for simply expanding the single title. The biggest concern here is that the components listed could be argued, at this point, to ONLY pertain to location and design, when it is clear that the intent is that many are meant to apply to management of the tread and surrounding lands of the AZNST.

Special Considerations

Proposed change (p. 49) Private Land – 3% of the AZT would be approximately 25 miles of trail, for which we assume there is no perpetual right of passage or protection for the AZT experience. To assume that this is not going to change is to abandon the responsibility of the agency to have a fully protected AZT management corridor. Assuming this to be the case, as the draft indicates will surely be a self-fulfilling prophecy and, as such, fails to discharge the agency’s responsibilities under the NTSA. Remove the second half of this sentence.

Proposed correction (p.49) National Parks and Units of the Wilderness Preservation System – These entities can only be created by Congressional action, and to intimate that the President or a State can do so is simply incorrect. Remove the last two entities in the first sentence.

Desired Conditions

Proposed change (p.50) First sentence in this section – This sentence may apply to non-federal agencies, but the US Forest Service and BLM are ***required*** to develop plan components that include desired conditions through the USFS Planning Rule and Directives and the BLM Manual Supplements regarding NSTs.

Proposed change (p.50) Desired Conditions 2. – “majority” is hardly sufficient (51%). *The largest portion of the AZNST possible* is situated… would be more appropriate. The wording should lead managers to maximizing the recreation potential of the AZT as required in the NTSA.

Proposed change (p. 50) Desired Conditions – As in Chapter 3, there is insufficient attention paid to scenery as a design opportunity here. We would propose an additional desired condition as follows:

*6. The seen area from the AZNST that is managed for a Scenic Integrity Objective (SIO) of very high or high is maximized withing the foreground viewshed. The seen area from the AZNST that is managed for an SIO of moderate or higher is maximized within the middle ground and background viewing areas. Emphasis for achieving these conditions is focused on lands managed by federal agencies.*

Proposed change (p. 50) Desired Conditions – There is a lack of a desired condition related to Recreation Opportunity Spectrum (ROS) classes. We would propose an additional desired condition as follows:

*7. The location of the AZNST and the management of surrounding lands will maximize the portion of the trail that will fall into the primitive, and semi-primitive non-motorized ROS classifications. In areas where this is not possible the trail provides an experience that is primitive and natural as possible.*

Management Practices

Again, while we would hope that all land managers and owners along the AZNST would adopt the management practices in the Comp Plan, federal agencies are ***required*** to develop necessary plan components including standards and guidelines in their plans according to the USFS Planning Rule and Directives and the BLM Manual Supplements regarding NSTs. The introduction to this section should make this clear.

Proposed change (p.51) Scenery 3. The current variety of vegetative types may not be what is desired for an area of the AZT. Past management and other events may have resulted in a loss of diversity and composition from the optimal land condition. We would recommend the following edit: Management activities should *enhance or* sustain the current variety…

Proposed clarification (p.52) Facilities 1. While we believe that we understand the intent of this item, we believe that it it not stated clearly and , therefore, propose this edit: *Connect the AZNST to parking areas, campgrounds, public corrals and other like facilities through side trails, rather than passing directly through them, when such facilities are determined to be appropriate through analysis of resource capability and use demand.*

Proposed change (p. 52) General 6. Since the intent of moving the AZNST is often to improve the trail, we propose that the following minor change for clarity: …move the AZNST to preserve *or enhance* its nature and purposes.

Proposed change (p. 53) General 7. This section is poorly worded and confusing. It does not align with other section of the plan that refer to trail location. An Optimal Location Review (OLR) takes in to consideration a variety of factors to select the long term optimal location for an NST. To make assumptions regarding what constitutes an “…optimal recreation experience…” as this management practice statement does is inappropriate. These factors are laid out accurately in Chapter 3. We would propose the following changes to item 7: Remove the second sentence entirely and reword the last sentence as follows – The main objective should be to provide protection of trail values and resources, including long term continuity as required by the NTSA. The optimal location will be on lands, or lands controlled through easement that are publicly owned and managed.

Proposed change (p. 53) General 9. We propose the addition of the following sentence to the current item: *When possible, access amenities and services in rural and urban settings through establishment of side trails leading to and from these settings, rather than by locating the AZNST in those settings.* Also change the word “or” to “*than*”, in the first line.

Proposed change (p. 53) General 13. To match other direction in this plan in multiple locations, replace “optimal location criteria” with optimal location *review*, which is well defined elsewhere.

Proposed change (p. 53) General 14. All of the entities called out here for consultation should be included, not just one of them. To clarify reword the list as “the trail administrator, partners ***and*** planning staffs of the relevant agencies…”

Proposed change (p. 53) General 17. Add the following phrase to the current statement: .. *unless the intention is to relocate the route or close the route to motorized use.* This is clearly a valid choice in travel management decisions.

Proposed change (p.53) General 18. Change the term “equestrian access standards” to “equestrian *design* standards”

Proposed change (p. 54) General 19. To accomplish this as currently stated, the tread would have to be 7 feet wide and the cleared area be 13 feet wide, continuously, which given the described situation is unlikely to be feasible. Rethink the intent of this item and rewrite. We would propose language, but the underlying intent is currently unclear to us.

Proposed change (p.54) General 20. This sentence is unclear and grammatically challenged. Please rewrite to clarify the intent of this management practice.

**Connecting and Side Trails**

Desired Conditions

Proposed change (p.55) Desired Conditions 2. The second sentence in this statement is of unknown origin and sounds more like a description of a National Recreation Trail than any direction that we are familiar with regarding Side and Connecting Trail as it appears in the NTSA or related agency policy. The adoption of this direction would all but eliminate the use of this tool from the NTSA from application. This sentence should be removed from the plan.

**Managed Trail Uses**

As described in the response to this term in our comments on Chapter 3, we believe that this term is inappropriate in describing these uses of the AZNST. The three uses of the AZNST that are referred to in the NTSA designation language for this trail are more important than a host of other uses that may be appropriate on the AZNST. They need to be recognized as such and the term used in other NST Comprehensive Plans is Primary uses, which clearly set them apart from other uses that may be managed on the AZNST.

Required change (p. 58) Managed Trail Uses 4. We propose the following revised wording for the last sentence for this section: *In areas where e-bikes are currently allowed, such locations are interim routes for the trail and relocation of the AZNST must be accomplished or the e-bike use terminated to comply with legal requirements of the NTSA.* This is not optional or something that just may be considered.

Management Practices

Required change (p. 58) Management Practices 3. This inaccurately describes the legal situation for sections of the AZNST co-located on motorized travelways. The proposed change is not optional. A correct description would be as follows:

*3. Motor Vehicle use by the public is, by law, prohibited on all sections of the AZNST. Sections that are collocated with open motorized routes are interim routes for the AZNST and must be relocated or the motorized use must be terminated to comply with the NTSA.*

The remainder of the statement is correct and should be retained as it currently appears.

**Special Use Authorizations**

Proposed change (p. 62) Management Practices 9. This item should not be located in this section of the plan. Tribal protected rights for such uses do not require any special use authorization and this direction belongs in a section or sections of the plan related to tribal treaty obligations and tribal relations.

**Trail and Facility Development and Maintenance.**

We would propose that a clearer and more appropriate title for this section would be ***Trail Facility Development and Management***, as it refers to the tread or travelway of the AZNST ( the built facility of the trail) and management beyond maintenance.

Proposed change (p. 63) introductory paragraph The second part of the first sentence refers to “facilities that are necessary or desired by trail users…” We would recommend using the phrase *necessary and appropriate*.

Proposed change (p. 63) Desired Conditions 2. This direction refers specifically to the built facility of the trail, so as recommended earlier in these comments and used in other locations in the draft plan, should begin with “the AZNST *trail tread* is in good condition…”

Proposed change (p. 63) Desired Conditions 3. Add the following sentence: *Trailheads are best located off the main tread of the AZNST and provided with safe connecting access.*

Management Practices

**Trail**

Proposed change (p.64) As presented before, use of this term to describe the built facility of the AZNST is confusing and lacks clarity. The term used elsewhere in this draft plan is ***Trail Tread***, and that should be utilized here.

Proposed change (p. 64) 7. It is important that the Arizona Trail Sign Guidelines be included in this document as an appendix.

**Facilities**

**EDIT**  (p.65) 2. The words “ensure to” are confusing and serve no purpose. They should be deleted from the statement.

Proposed clarification (p.66) 11. & 12. This wording is found here and in other sections of the plan. A more balanced approach should include both impacts of public use of the AZNST on grazing and the impacts of grazing on AZNST uses and resources. To be blunt the AZNST is the congressionally designated entity. References to not impacting uses of private landowners along the trail in the NTSA refer to owned lands not permittees on federal lands. The approach in item 11 is appropriate and the assertion in item 12 is not and should be rewritten to encourage avoiding impacts on livestock use in a congressionally designated area. An additional item here should address the avoidance of impacts of livestock facilities on federal land on the AZNST and the public’s access to water on federal lands.

Visitor Use Management and Capacity

Proposed change (p.66) first paragraph of this section Significant resources are an integral part of the AZNST and essential to provide maximum recreational benefit to the public. In the last line of this para graph, to be sure that the intent is clear, we would recommend that the following edit be made: The primary goal of visitor use management is to maintain opportunities for high-quality visitor experiences *including through the protection of AZNST resources*.

**Missing section – Sign Guidelines** (p. 64-5?) The NTSA requires that the Comprehensive Plan include guidance for signing, which seems to be missing. This is particularly confusing since a current set of AZNST Sign Guideline exists. The deficiency can be resolved by referencing the existing direction in this section and including this direction in an appendix.

**Corridor and Resource Protection and Management**

Land Acquisition and Protection

**Forest Service Authority**

Proposed change (p.72) bullets. The acquisition authority in the NTSA, which is about as broad as one can get and which is not limited to lands either within Forest proclamation boundaries or to land adjacent to existing agency managed lands is not listed as the primary authority for acquisitions for the AZNST. This is the specific authority for this designated area and is tailored to the particular needs of a National Scenic Trail. It should be first on the list and recognized as such.

Why you would list Weeks Act authority for the AZNST Comp Plan which cannot utilize that authority is simply confusing the issue.

Below the bullets is a dated reference regarding annual appropriations to LWCF, which are no longer required. Simply delete the sentence.

**Bureau of Land Management**

Proposed changes (p. 72 - 73) Parallel to the section preceding this one the title should be ***Bureau of Land Management Authority.*** It should be made clear in the first paragraph that BLM has the same authorities as the USFS under Section 7 of the NTSA.

**Desired Conditions**

Proposed addition (p. 74) item 2. Add to the end of the sentence the words ***in perpetuity***.

**Management Practices**

Proposed addition (p.74) item 2. Please add the end of this statement ***in perpetuity***. There are many situations on the AZNST where the permanence of protection is an issue.

Visual, Aural and Dark Sky Resources

Proposed clarification (p.75) second paragraph of the section It is important to identify existing agency systems for managing scenery. At the beginning of this section, the generic term “scenery management” should be replaced with ***The USDA Scenery Management/Visual Management Systems and the USDI Visual Resource Management system.***

Existing Law and Policy

**EDIT** (p. 75) first paragraph of the section. The first phrase is missing something. At least ***the*** Forest Service, if not ***the USDA*** Forest Service.

Required change (p.75) second paragraph. The portrayal of the responsibility of the agencies as stated in the second sentence is less strong than the words of the NTSA require. Either in replacement of, or in addition to that sentence should appear that ***the agencies are restricted by law from allowing activities which substantially interfere with the nature and purposes for which the AZNST was established including scenery resources.***

Management Practices

Proposed changes (p. 76) 1. This statement should be clarified by using either ***planning*** corridor or ***management*** corridor, which are defined previously in the plan rather than the undefined, “corridor”. Writing off the foreground corridor due to past management is unacceptable. The second sentence should have the following phrase added: …***or where rehabilitation will return these lands to those criteria***.

Proposed change (p. 76) 2. Screening vegetation should never be relied upon to screen facilities as it is ephemeral in nature. Fire, disease, insect infestation, weather events or human action can all remove the screening at a moment’s notice leaving unacceptable impacts and a lengthy recovery time. As such the last phrase in this statement must be removed.

Proposed changes (76) 3. Given the likely scale of log decks and like disturbances, the direction should be extended to include middleground to even meet an SIO of moderate. Change “foreground to foreground ***and middleground*** in the last sentence.

Proposed changes (76) 4. Again replace “corridor” with either ***planning*** corridor or ***management*** corridor, which are defined previously in the plan. At the end of statement change “…and managed accordingly.” To the following: …and managed *to meet a minimum SIO of moderate*. Giving clearer direction for managers and planners as on the first statement in this list.

(p. 77) 7. through 10. We want to prioritize the retention of these statements as they appear in the draft, in the final Comp Plan.

Recreation Resource Protection

 **Missing topic area** - ***Recreation Opportunities***  ( between “Existing Law, Regulation and Policy” and “Cultural Resource Protection”) The Forest Service has an effective and well respected system for managing recreation across a spectrum of opportunities – the Recreation Opportunity Spectrum (ROS). While it is referenced many places in this plan and described in the section here titled “Existing Law. Regulation and Policy”, it lacks adequate specific Desired Conditions and Management Practices, and those that exist are not gathered together for ease of reference, which is a major deficiency in the draft plan. To remedy this situation, the ROS description should be included in a new topic section as described above, that incorporates the descriptive materials in pages 78 and 79 and includes separate Desired Conditions and Management Practices sections specifically tied to ROS. Some of the individual items in the existing section may fit in this new topic area (Desired Condition 4, Management Practices 5, 6, 7, & 9) but more specific directions regarding setting management based on ROS are needed. Here are some proposed additional items and if the agency declines to make the plan less confusing by separating this direction out, we expect that the direction itself would be incorporated into “Existing Law, Regulation and Policy”:

Proposed change - *Recreation Opportunities* section. We would suggest the addition of the following statement to the description of ROS as it applies to the AZNST: *The trail provides a linear experience to users, and as such, may provide an experience to users that is more primitive than a simple ROS inventory may suggest. Management actions should take this into account when determining the agency’s ability to provide such experiences along the AZNST.*

Desired Conditions

* *Lands surrounding the AZNST will be managed in the most primitive ROS classification possible.*
* *Lands in the foreground and midddleground distance zones provide AZNST experiences that would fall into the Primitive and Semi-Primitive Non-Motorized category whenever possible. This does not indicate that all these lands provide such experiences everywhere, but rather that their management results in such experiences on the AZNST.*

Management Practices

* *Where possible, lands in the trail management area should be managed to provide a semi-primitive non-motorized or primitive experience for users. This may include the relocation of motorized travelways or the closure of travelways to motorized use, or the relocation of the AZNST, when trail values and resources would not be compromised. To provide such experiences lands in the middleground zone should be managed to achieve an SIO of moderate so as to mitigate the impact of motorized roads on theexperience within the management area.*

Forest and Forest Health Protection

Proposed change (p.87) Management Practices .5 We recommend the following rewording of the statement: Local agency trails coordinators and the Arizona Trail Association *should be engaged in* *and a part of,* completing a post-fire assessment.

Multiple Use

Existing Law, Regulation and Policy

Proposed changes (p. 88) Introduction to this section. The first sentence in this introduction should be: *Land management plans and direction must comply with the National Trails System Act.*

In addition to the Forest Service handbook and manuals, reference should be included here regarding the current Forest Planning Rule and Directives which provide specific direction for National Scenic Trails in Forest Plans. We will hold the agency to this direction, and this is an ideal place to put it before agency planners and decision makers.

Proposed addition (p. 89) last introductory paragraph. We propose the addition of the following sentence as the second sentence of the paragraph: *A careful review and understanding of the content and intent of the Multiple Use and Sustained Yield Act should guide management of multiple uses in the AZNST planning area.*

Desired Conditions

Inquiry – (p.89) 3. It would be helpful to include examples of how the AZNST might negatively affect adjacent landowners. We understand this concept, but cannot think of a single example of when this has been true.

Management Practices

Required changes (p. 89) 5. & 6. The protection of AZNST resources is required by law. Doing so is not optional. In a statement of Management Practices such action is required and, therefore we would suggest the following revisions to correct the draft plan: In statement 5, “…resources associated with the AZNST *shall* be informed by an inventory…”. In the next sentence, “*This* analysis *is required to* determine whether projects would substantially interfere with the nature and purposes of the AZNST. *Proposed actions which do so may not be permitted.* We realize that it is not reasonable for the agency to complete a comprehensive resource inventory for the whole trail as envisioned by Congress in the NTSA. This makes it even more important to complete such inventories as projects are proposed to comply with the intent of the law.

Similarly in statement 6, the agency is required by law to minimize impacts on these resources to assure that actions do not substantially interfere. (There also seem to be problems with the sentence in that it is the impacts, not the activities that are to be minimized.) Our proposal for rewording is: *For* activities with potential negative effects on the scenic, natural, historic, or cultural resources associated with the AZNST, *these impacts* *shall* be minimized through avoidance, *and when avoidance is not possible,* the use of appropriate project design criteria, mitigating measures and best management practices.

Proposed changes (p.89) 7. & 9. While we have no concerns with the content of these management practices, they present the opportunity to correct a draft plan deficiency – direction regarding the management of impact from grazing operations on public land that have negative impacts on the AZNST. This is the ideal place to correct that, by adding the following sentence to statement 7: *Ranching activities that impact the scenic, natural, historic, or cultural resources associated with the AZNST shall be minimized through avoidance, and when avoidance is not possible, the use of appropriate project design criteria, mitigating measures and best management practices.*

Proposed addition (p. 90) 10. Second bullet We would propose that the following phrase be added to the statement: …*or other similar linear facilities with negative impacts, such as roads.*

Proposed addition (p.90) Add 11th item – *When livestock operations negatively impact AZNST values and resources, including the AZNST user experience, mitigate impacts to the extent possible through collaborative solutions.*

In addition to the comments presented in this document, we have reviewed comments being submitted by the Arizona Trail Association. This organization has a great depth of knowledge regarding the details of the AZNST and its current situation and management. PNTS is very concerned that the AZNST Comprehensive Plan be as accurate as possible and recommend a very close reading of their comments to resolve a large number of errors in place names, trail mileages, and details of situations on the ground.

Thank you for the opportunity to work with the Forest Service to make the AZNST Comprehensive Plan the best direction possible, especially given the expected long life of the plan. As always, we stand ready to collaborate with our agency partners in this work. If it would be helpful to talk or correspond to clarify our comments and proposals or to work cooperatively on appropriate language, please do not hesitate to contact us at the addresses and numbers below.

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