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First name: Fred
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Organization: Arizona Trail Associatioin
Title: Vice President Trail Operatioins
Comments: March 18, 2016
Christina Pearson, Project Leader
Santa Catalina Ranger District
5700 N. Sabino Canyon Road
Tucson, AZ 85070
RE: Catalina - Rincon FireScape
Dear Ms. Pearson:
The Arizona Trail Association is appreciative for the opportunity to comment on the Draft Environmental Assessment for the Catalina - Rincon FireScape.
The proposed project will have a temporary negative impact but a long term positive impact on the Arizona National Scenic Trail (AZT) and the experience of trail users, including hikers, runners, backpackers, mountain bikers 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 attracts locals and international visitors alike, and has become increasingly popular since its completion in 2011. It is an economic engine for the state of Arizona as well as the 33 Arizona Trail Gateway Communities, including the towns of Vail, Summerhaven and Oracle
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 build, maintain, promote, protect and sustain the Arizona Trail, the Arizona Trail Association (ATA) submits these comments.
The ATA supports the proposed ecosystem restoration treatments over the long term (five or more years), which will protect recreational trails, including the AZT. The scenic quality of the diverse vegetation communities will be protected from the devastating effects of catastrophic wildfires.
The ATA, however, prefers the Wilderness Alternative since the soundscape is already denigrated by the use of helicopters in the Pusch Ridge Wilderness for the management of bighorn sheep. Even though some negative effects would be extended, the cumulative effects of the use of helicopters in the Pusch Ridge Wilderness are a major negative impact. If the use of chainsaws would result in a healthier and more resilient forest, which would decrease the risk of major wildfires, then a Minimum Requirements Decision Guide analysis and approval by Regional Forester would authorize their use. No helicopter flights should be authorized in either wilderness area.
The Arizona National Scenic Trail is included for "special management consideration" for the Oro, Redington, Rincon, and Oracle groups and in the Push Ridge Wilderness (pp. 23, 26, 27, 28, and 30). ATA recommends that the AZT also be included for "special management consideration" in the Mountain Top group (p. 30).
The Design Features under Recreation and Scenery (pp. 140-141) do specify mitigations for trails, although not specifically for the Arizona National Scenic Trail. The following items will strengthen mitigations needed for the AZT and forest trails:
1. Rec-1: Notification. 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 in the Catalina - Rincon FireScape area.
2. Rec-2: Rehabilitation of recreation infrastructure. Inclusion of "to existing or better condition" would strengthen this design feature and make it similar to the excellent Rec-10 design feature.
3. Rec-5: Timing of Activities. Although portions of trails, including the AZT and the non-Pusch Ridge Wilderness route for equestrians and mountain bikers, may be temporarily closed, well-marked and publicized detour routes must be established. The coordination with a

district recreation and/or trails staff will ensure an appropriate detour route. If the AZT is not closed, warning signs should be placed at all trail access points where treatment activities are occurring.

4. Rec-6: The concentration of handlines along trails implies that thinning and/or burning will occur right up to the trail. For all trails, and especially the AZT, the thinning/burning to the trail could result in a severe degradation of the scenic value of the AZT, both short term and long term. If handlines were on both sides of the AZT, the vegetation disturbance would be most noticeable. The ATA recommends that no handlines be concentrated on the Arizona National Scenic Trail; nor should the AZT be used as a boundary for treatment. If the AZT is necessary to be used as fire control lines, the district recreation and/or trails staff should be involved in preparation and post-treatment of the lines. When restoration treatments are within close proximity (100-200 feet), they should be feathered so the visual impacts are transitional rather than abrupt and to not significantly change the scenic character or experience of the trail.

5. Rec-4 and Rec-8. Slash and materials, such as brush around signs, etc., from treatment are to be removed as soon as possible. If slash and brush treatments are left on the ground in the immediate foreground view, the Level 1 scenic views along the AZT should not be degraded.

6. The AZT and forest trails should not be used as skid trails or temporary roads. If a skid trail must cross the AZT or district trails, district recreation or trails staff should designate and flag the crossing. Trail crossing must be restored to pre-project condition after use, at a minimum.

7. The Recreation and Scenery Design Features are positive for all forest restoration activities. They should be explicitly communicated to all individuals working on the project, not only stated in prescriptions for treatment within contracts, but communicated to each person involved in thinning and/or burning. Individuals need to understand the importance of the Arizona National Scenic Trail and how their work can positively or negatively impact this important resource. Forest Service personnel and ATA Trail Stewards should monitor and evaluate activities as they progress, not just upon completion.

Thank you for your time and effort to review these comments. If you have any questions, or would like additional comments, perhaps an in-person meeting, please contact me; Matthew Nelson, Executive Director (matthew@aztrail.org); or Shawn Redfield, Trail Director (traildirector@aztrail.org).

Sincerely,

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Arizona Trail Association Board of Directors
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