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First name: Fred
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Organization: Arizona Trail Association
Title: Vice President for Trail Operations
Comments: Also see attachment for pdf of letter

August 9, 2016

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

RE: 4FRI Rim Country Project: Scoping Proposed Action

Dear Ms. Fredette:

The Arizona Trail Association is appreciative for the opportunity to comment on the Four Forest Restoration Initiative Rim Country Project Scoping Proposed Action.

The proposed project will have a temporary negative impact but a long-term positive impact on the Arizona National Scenic Trail (AZT) west of SR87 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 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 build, maintain, promote, protect and sustain the Arizona Trail, the Arizona Trail Association (ATA) submits these scoping comments.

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, over the long term. The Arizona National Scenic Trail and other trails are important values at risk, and as such, will 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 of Appendix C of the 2013 DEIS are most appropriate and positive mitigations and would protect the recreational values and scenic views for all trails, including the AZT.

As part of RS7, Recreation and Other Trail Mitigation, particularly important for users of the AZT, is notification to the public when forest restoration activities are scheduled. Specifically, District Recreational Specialists should "ensure well marked and publicized detour routes for the Arizona Trail" (p. 18). 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 need to be addressed for the Draft Environmental Impact Statement include the following from Appendix C:

1. Avoid using the AZT as a boundary and have minimal marking of trees within the Arizona Trail corridor (RS2 p. 14).
2. The highest emphasis for slash treatment, temporary road closures, and road decommissioning will be placed on foreground of a number of entities including national scenic, historical or recreational trails (RS3(d) p. 14-15).
3. "National, Historic, and Recreational Trails as well as forest system trails . . . will not be used as temporary roads or skid trails" (RS3(h) p. 15). Any perpendicular trail crossing will be restored to pre-project conditions. "Crossing of the Arizona Trail will be done sparingly and only if no other alternative exits" (RS3(i) p. 15).
4. Slash piles should be at least 300' from the AZT and fire control lines on the AZT need to be coordinated with district recreational staff (RS3 and RS4 p. 16).
5. Jack straw treatment shall not be implemented within 1,000' of the AZT (RS6 p.16).
6. Along the AZT, character trees of unique form or shape should be retained when feasible. Avoid abrupt changes in the landscape along the AZT trail corridor (RS7(d) p. 17).

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. 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 scoping comments. The ATA looks forward to this proposed action moving ahead to the Environmental Impact Statement and ultimately to activities in the forest that will protect the AZT and more importantly the forest, watersheds, wildlife 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, Trail Director (traildirector@aztrail.org); or me.

Sincerely,

Fred Gaudet
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cc:

Laura White, US Forest Service Administrator of AZT
Matthew Nelson, Executive Director, ATA
Shawn Redfield, Trail Director, ATA