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Organization: Arizona Department of Transportation  
Title: Environmental Services Director  
Comments: March 20,2014

Mr. Earl Stewart  
Forest Supervisor  
Coconino National Forest Supervisor's Office  
Attention: Plan Revision  
1824 South Thompson Street  
Flagstaff, AZ 86001

Subject: Comments on Draft Land and Resource Management Plan for the Coconino National Forest (MB-R3-04-20) and Draft Environmental Impact Statement for the Coconino National Forest Land and Resource Management Plan (MB-R3-04-21)

Dear Mr. Stewart:

The Arizona Department of Transportation (ADOT) has reviewed the Coconino National Forest (CNF) Draft Land and Resource Management Plan (LRMP) and associated Draft Environmental Impact Statement (DEIS). ADOT staff attended a public information meeting and met with CNF personnel on February 25,2013 and received a hard copy and electronic version of the reports. The purpose of this letter is to offer written comments and to thank you for meeting with us to discuss this and other resource management concerns our agencies share. Below are general comments and a summary of planned ADOT projects within CNF followed by comments on the draft documents.

The Four Agency Partnership between ADOT, the Federal Highway Administration (FHWA), the US Forest Service (USFS) and the Bureau of Land Management (BLM) was established to provide a framework for the agencies to actively and effectively cooperate with each other throughout the planning, design, construction and maintenance of highway corridors. The process is formalized in a Memorandum of Understanding (MOU) between USFS, FHWA, and ADOT and in the 2008 manual: Guidelines for Highways on BLM and USFS Lands and 2011 Supplement: Guidelines for Long-Range Planning, which are available on the ADOT website (see references at end of letter). This manual describes accepted procedures, as well as the needs and concerns of each agency in an effort to minimize conflict and facilitate the creation of safe, environmentally sound and aesthetically pleasing highway corridors.

USFS Region 3, FHWA and ADOT also collaborated on the USFS document Environmental Assessment for Management of Noxious Weeds and Hazardous Vegetation on Public Roads on National Forest Lands in Arizona, which regulates ADOT's herbicide use on USFS lands. The EA allows use of herbicide with approval on areas up to 200 feet outside of the roadway easement if needed to effectively control vegetation. The associated Memorandum of Understanding provides a strategy for ADOT-USFS coordination regarding the presence of invasive plants and hazardous vegetation and \*planned activities to control and/or remove this vegetation. Incorporation of these documents and guidelines into the LRMP and consideration of normal maintenance and preservation activities so that Plan Amendments are not required for these activities to proceed would be appreciated.

The ADOT Five-Year Plan for 2014-2018 and Tentative Five-Year Plan for 2015-2019 contain several preservation and safety projects on facilities within or adjacent to the CNF, which are listed in the table

below. These projects include pavement preservation, minor improvements on State Route (SR) 180, rockfall mitigation, deck replacement and steel girder repair on two structures, and installation of inlaid pavement markings on Interstate 40 (I-40). The Central Federal Lands Highway Division (CFLHD) of FHWA is leading a project that would include shoulder widening, construction of passing lanes and drainage improvements on SR 89A.

ADOT 5-Year Plan (2014-2018) and Tentative 5-Year Plan (2015-2019): Projects in Coconino National Forest

ADOT Project Number

Route  
Mile  
posts

Scope of Work

Project Name

H7418SR 89A3852015: Oak Creek bank protectionOak Creek Canyon

H7890

I-40

218-219

2014: Bridge deck replacementCanyon Padre Bridge, Str #1670

& WB #2270; NEPA complete

H8118

SR 180

216-2232015: Pavement preservation,

2016: MP 216-219 widening, curb and gutter, drainage improvements

Columbus Ave to Snow Bowl; NEPA complete

H8125

I-40

205-2182015: Install inlaid pavement markings, pavement preservation

Walnut Canyon- Twin Arrows

H8126

SR 89A

386-3902014: Rockfall mitigation, pavement preservation

Pumphouse Wash to Overlook

NASR 89A387-3882015: Design bridge deck rehabilitationPumphouse Wash Bridge

CFLHD is

lead

SR89A

391-3942016: Shoulder widening,add passing lanes, drainage improvementsOverlook to JW Powell Blvd;  
CFLHD is leading project  
H86061-17279-2922015:Pavement preservationSR 169 - Middle Verde TI  
H86271-17292-2932016: Rockfall mitigationSouth of McGuireville  
H86321-17293-2942015: Steel girder repair on bridgeMcGuireville TI UP Str #652  
H87211-17326-3272017: Bridge replacement and rehabilitationWillard Springs  
NA1-17340-3412015: Bridge deck rehabilitation1-40 TI Overpass  
H86951-401852016: Sign rehabilitationTranswestern- Leupp Jet  
NA1-40179-1912018: Pavement preservationParks TI to Riordan Bridge  
NA1-40188-1892016: Design rockfall mitigationRiordan  
NA1-40195-1962015: Design bridge deck rehabilitationSR89A Overpass  
NASR 87286-2872017: Rockfall mitigationClover Creek

The Long-Range Plan for 2035 contains one potential new Arizona state road that would cross CNF land. It is called the Western Bypass (it is listed in Appendix A of the 2011Long-Range Transportation Plan). It would be an approximately 35-mile long bypass around the City of Flagstaff starting at approximately MP 190 on 1-40 and curving around the city boundary of Flagstaff to end at approximately MP 425 on US 89. This project has not entered the planning process. Comments on Draft LRMP

1. Forestwide Management:

a. Wildlife, Fish and Plants: Guideline #10 (FW-WFP-G-10) states that road ROW fences are recommended to be located 1/8 mile from roads (page 75). ADOT would like to confirm that if existing roads are upgraded and the easement is not wide enough to allow this

distance to the ROW fence, this would be a defensible reason for deviation from this guideline without a plan amendment.

b. Roads and Facilities: ADOT appreciates the recommendation to continue to work closely with other agencies and groups to identify wildlife linkages and barriers and to mitigate such threats during project design as well as for collaboration to meet future transportation needs (page 94). ADOT would like to encourage CNF to become involved in the long-range planning process to allow additional time for consideration of the most effective and efficient ways to incorporate wildlife permeability considerations in transportation projects. Please refer to the Supplement to the Four Agency Partnership Guidelines referenced above. The Supplement details the long-range planning process for ADOT and the other agencies.

Desired Conditions for Roads and Facilities {{FW-RdsFac-DC) #3 states that "roads under easement are maintained to Forest Service standards" (page 91). ADOT requests adding a reference to the conditions of the easement deed agreements and the Four Agency Partnership Guidelines referenced above; a link to the online document is included in the references at the end of this letter.

2. Scenery Management: ADOT appreciates the consideration for exempting interstates, highways and regional travelways and associated structures, with the exception of scenic byways, from high Scenic Integrity Objectives {{SIO), as stated on page 113. We also appreciate the allowance for functionality of wildlife structures in relation to the SIOs in Guideline #10 (FW-Scenic-G) on page 115.

a.We request clarification of the SIO that ADOT will be requested to conform with for road facilities and whether associated buildings will fall within this category. Does exemption from the high SIO mean that the moderate SIO will be applied? ADOT proposes instead of applying the area-wide SIOs,developing desired conditions for different types of road facilities,such as interstates,state highways and scenic roads. ADOT would like to meet to discuss this approach in more detail. Please also see the attached 2012 BLM Sonoran Desert National Monument Resource Management Plan Map 3, which shows buffers along the highway corridors that were designated as Visual Resource Management Class III,a lower requirement than for the surrounding land.

b. All Scenic Byways: ADOT would appreciate an opportunity to meet and discuss the approach for

maintenance of scenic roads within CNF. These roads are maintained with a reduced or minimal "clear zone" adjacent to the pavement due to scenic considerations and require maintenance to keep the roadway free of obstructions from fallen vegetation or rocks. More clearly defined desired conditions and review procedures to perform maintenance activities on these roads relative to aesthetic and other considerations would be beneficial.

The All Scenic Byways section, beginning on page 163, references Historic Route 66 and SR 179, but not SR 89A (Sedona- Oak Creek Scenic Road and Dry Creek Scenic Road) or SR 180 (San Francisco Peaks Scenic Road). SR 179 and SR 89A are discussed beginning on page 134 as part of the Sedona/Oak Creek Management Area, which states that they are expected to continue to be managed to a rural Recreation Opportunity Spectrum

((ROS) level adjacent to the roadways. How does this interface with the Desired Conditions for All Scenic Byways ((SA-Tri&Bwy-Bywy-All-DC, page 163) and for the Red Rock All-American Road ((SA-Tri&Bwy-RedRck-DC, page 165)?

We suggest including mileposts for sections of roads with special designations in the document for clarity. We also recommend including information on state versus federal scenic road designation for the Scenic Byways section and referring to other documents and sections of LRMP that may affect management. Other documents include the Four Agency Partnership Handbook, the USFS-ADOT MOU and possibly the Corridor Management Plans that have been developed under FHWA's guidelines (<http://www.azdot.gov/about/scenic-roads/corridor-management-plans/overview>). Other sections of the LRMP might include the Sedona/Oak Creek Desired Conditions and Guidelines (MA-SedOak-DC #2, 22, 28, 29, 32; MA-SedOak-G #1, 8, 9, 17, 20).

c. It appears that some of the ADOT roadway corridors are shown in areas designated as needing SIO rehabilitation (Map 16, page 232). How would this be accomplished for road easements? Would the target be to achieve a moderate SIO in the easement? Would this be a Forest-led project or something ADOT is asked to add into transportation projects? As discussed above, ADOT has mainly preservation and safety projects planned in the near future. Would a separate process be required for including rehabilitation work with approval of each project that ADOT proposes? If this were to be required, it would need to be considered in ADOT's project planning and budgeting process.

3. Recreation Opportunity Spectrum: The ROS designation adjacent and in easements could impact how ADOT maintains and upgrades highway corridors. Semi-primitive non-motorized is designated along a portion of State Route 260 (Map 14, page 230 and interactive maps online).

It is unclear how large a buffer is provided between the ADOT easement and the area designated for semi-primitive non-motorized use. ADOT requests that the buffer between any wilderness and semi-primitive ROS designated areas would be at least 200 feet to maintain consistency with the Environmental Assessment for Management of Noxious Weeds and Hazardous Vegetation on Public Roads on National Forest System Lands in Arizona (US Forest Service Region 3, 2003; Proposed Action, page 10) allowing treatment of areas up to 200 feet outside of road easements for control of noxious and invasive plant species.

#### Comments on DEIS

1. Wilderness Areas: ADOT does not have concerns with the recommended wilderness areas presented in the LRMP, but does have some concern with the Cimmaron-Boulder and Black Mountain Recommended Wilderness Areas along SR 260 in Alternative C in the DEIS (per the online interactive maps). These recommended Wilderness Areas do not appear to have an adequate buffer zone between the designated edge and the ADOT easement for SR 260 to allow for maintenance within the right-of-way. As stated above regarding the ROS, ADOT requests an adequate buffer to allow for treatment of noxious and invasive plants up to 200 feet outside of the easement per the existing EA for herbicide use; this may require a larger than 200-foot buffer adjacent to the recommended wilderness areas if there are concerns with noise effects from use of motorized vehicles to vegetation management. We are concerned with designating Wilderness too close to road

easements may present operational challenges for the roadways.

Thank you for the opportunity to review and provide comments on the CNF LRMP and DEIS. As mentioned above, we would appreciate the opportunity to meet with CNF staff to discuss how the LRMP scenic objectives and land management goals will affect review procedures for road construction and maintenance projects. We look forward to continuing coordination with the CNF and will plan to update you on any developments not mentioned in this letter. If you have any questions or concerns, please contact Justion White (602-399-3233, [jwhite@azdot.gov](mailto:jwhite@azdot.gov)) or myself at 602-712-8272, ([tgwilliams@azdot.gov](mailto:tgwilliams@azdot.gov)).

Sincerely,

J&J (6\_ ,tlf Todd G. Williams,M.Sc. Environmental Services Director

Enclosure

#### References

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