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Comments: As a member of Arizona Trail Association, I thank all of the authors who contributed to the AZNST Draft Comprehensive Plan.

As a trail user and a trail maintenance volunteer, I strongly endorse the adoption of this Comprehensive Plan to guide the multiple agencies and jurisdictions intersected by the Arizona Trail.

Respectfully I offer the following constructive comments:

RECREATION AND VISITOR USE EFFECTS ANALYSIS

Page 6 (6/30 pdf). Update Figure 2, Visitor registry summary total by year, with 2021, 2022 and 2023 annual data if available. Update Table 3, Thru travel completion surveys, with 2022 and 2023 data if available.

Page 7 (7/30 pdf). Information and Interpretation heading. Add to 3rd para, 'Updated details for each of the 43 passages are available online at <https://aztrail.org/explore/passages/>.'

Page 8 (8/30 pdf). Replace first para with: 'In 2023, over 2,000 volunteers reported more than

22,500 hours of volunteer time to the ATA. That equates to over \$682,000 and nearly 12 full-time staff members. (Arizona Trail Association, 2023 Annual Report, page 4).'

Page 15 (15/30 pdf). National Forest Management Plans heading. Line 4: replace 'Tonto (1985, currently under revision)' with 'Tonto (2024)'. Lines 5-6: Replace with 'The Tonto National Forest Land Management Plan (2024) covers National Trails in pp. 180-184, including the AZNST on page 181.'

Page 16 (16/30 pdf). Heading 'Mill [sic] Peak Wilderness' should be changed to 'Coronado National Forest Wilderness Areas'.

Page 19 (19/30 pdf). Heading 'Standards.' Line 1: Item '2.' should be changed to '1.' unless there is a missing Item 1., in which case it should be added. Line 2: Correct 'semiprimitivenonmotorized [sic]' to 'semi-primitive non-motorized.'

Page 23 (23/30 pdf). Tonto National Forest heading. This content, extending to the bottom of page 25, needs to be updated for consistency with Tonto National Forest Land Management Plan (2024), pages 180-184, pertaining to National Trails.

Page 28 (28/30 pdf). Conclusion heading. '... the proposed comprehensive plan would provide a consistent, trail-wide approach to managing the national scenic trail.' But does it? Pages 15-28 of the Recreation Analysis cite four different National Forest Plans (Coronado, Tonto, Coconino and Kaibab). Presumably this text cannot be modified, if it consists of quotes from existing, adopted Forest Plans.

To fulfill its mission of 'a consistent, trail-wide approach,' the new Comprehensive Plan needs to go beyond citing existing documents - as it already does in the Hydrology/Geology/Soils Resource Report, pages 20-24, and in the Terrestrial and Aquatic Wildlife report, page 34, Appendix C: Comprehensive Plan Nature, Purposes, Objectives, Significant Resources, Desired Conditions, and Management Practices. The Recreation Analysis can do the same.

The Comprehensive Plan affords an opportunity to advocate for Desired Conditions, Guidelines and Management Approaches which may be covered inconsistently, or not at all, in existing Forest Plans. That is, the Comprehensive Plan can and should serve as a road map for future recreation-related revisions of Forest Management Plans and other federal agency Management Plans, while also providing interim trail-wide guidance.

Among trail-wide topics which should be addressed:

1. Signage. Recommend consistent Arizona Trail signage in all National Forests and Federal Agencies. Include current Arizona Trail sign standards in an Appendix. Example: at an intersection of AZNST with other trails east of Pine, no AZT-related sign was included on the signpost. Multiple northbound AZT hikers failed to make the right-hand turn onto the co-located Highline and AZT trails, and instead mistakenly proceeded straight onto the Pineview Trail. An 'AZT logo' directional sign has been added to the signpost, to reduce such time-consuming mistakes caused by inadequate signage.
2. Fences. Recommend the replacement or bypassing of existing wire fence gates with hinged, latched steel gates and/or rolling gates (ramps). Include Arizona Trail Association steel gate and rolling gate standard designs in an Appendix.
3. Camping. Recommend designated camping sites in the vicinity of Arizona Trail Gateway communities, to facilitate Arizona Trail thru-hikers and other trail users. Example: Pine Trailhead, formerly available for camping, has been converted to day use. A replacement camping site is planned at proposed Bradshaw Trailhead, the subject of a pending Proposed Action. Explicit guidance in the Comprehensive Plan to encourage camping sites will support local Ranger Districts when they propose new or expanded campgrounds. Such guidance can be cited in case of public opposition to camping sites, which typically arises from vacation-rental interests.
4. Partnership and Volunteers. Incorporate the text of Tonto Forest Plan (page 26, 36/276 pdf), but expand and generalize it to include the Arizona Trail Association's Trail Steward program and volunteer activities, trail-wide.
5. Land acquisition. Arizona Trail Association has stated that acquisition of state Trust Lands is needed in some areas to protect portions of the Arizona Trail which are not currently in the public domain.

BOTANY

Page 4 (7/14 pdf). First paragraph, Line 1. Change 'Tonto (1985, currently under revision)' to 'Tonto (2024).'

HYDROLOGY/GEOLOGY/SOILS

Page 6 (7/25 pdf). Climate heading. First para, Line 3: change 'during the summer, then' to 'during the summer, when'.

RANGELAND RESOURCES REPORT

Page 2 (5/10 pdf). Tonto National Forest heading. Change 'Tonto Forest Plan (1985)' to 'Tonto Forest Plan (2024)'. Within the Tonto Forest Plan (2024), in the Rangelands, Forest and Grazing (GRZ) section, cite Objective 01 on page 51 (61/276 pdf): 'At least two water troughs or open storage tanks per ranger district will be fitted with wildlife escape ramps each year until all troughs and tanks have ramps.' This should be cited as a trail-wide objective, to provide more water sources for thru hikers.

Page 6 (9/10 pdf). Management Practices heading, second bullet point. Replace existing text with new text:

'Initiate a long-term program of replacing or bypassing existing wire fence gates with hinged, latched steel gates and/or rolling gates (ramps). Include Arizona Trail steel gate and rolling gate standard designs in an Appendix. Final bullet point, Line 1: after 'livestock operations and infrastructure,' insert: 'or if livestock operations and infrastructure are negatively impacting AZNST use,'. Example: Nicole Antionette's book, *How To Be Alone* (2022), an account of a 2017 north-south thru hike of the AZNST, bitterly complains of sections of the AZNST, including water sources, fouled with cattle waste. This was her major negative experience as an AZNST user. Inoperable wire gates were a second negative experience she cited.

Page 6 (9/10 pdf). Recommended new bullet point: 'Longer term, AZNST stakeholders should advocate for changes to the Taylor Grazing Act and other applicable statutes, to minimize grazing in low-productivity pasture characterized by low annual rainfall, poor soil, chaparral vegetation, high altitude, and where scenic value, including the presence of a National Scenic Trail, constitutes a higher and better use of federal land than cattle grazing.'

SOCIOECONOMIC REPORT

Page 1 (4/15 pdf). Effects Addressed heading, Effect 2, Line 1: change 'disproportionate or adverse impact' to 'disproportionate, adverse, or beneficial impact'. Methodology heading, Executive Order 14096 para, Lines 4-6: replace existing text to conform with "Strategic Planning to Advance Environmental Justice," White House CEQ, October 2023, posted to [whitehouse.gov](https://www.whitehouse.gov) website on Nov 3, 2023.

Page 5 (8/15 pdf). Penultimate para beginning with 'Pine', Line 1: change 'including Pine Loop trail' to 'including the 0.4 mile Interpretive Trail at Pine Trailhead, the 3-mile Pineview Loop co-located with a portion of the AZNST,'

Page 9 (12/15 pdf). First para, Issue 2, Line 1: replace 'disproportionate or adverse' with 'disproportionate, adverse or beneficial'.

Page 10 (13/15 pdf). Conclusions heading. Cite 2023 Annual Report of Arizona Trail Association: 'Community outreach and public engagement ... supports a diverse and inclusive AZT community.' (Page 4/16) 'In 2023, we developed, printed and installed 2 bilingual signs.' (Page 9/16) 'This year we welcomed these schools into our Seeds of Stewardship community: Puente de H[*oacute*]zh[*oacute*], a trilingual Title I elementary school ... Coconino High School, where we launched our first bilingual English/Spanish outdoor education programs ... Tucson Autism School.' (Page 10/16) 'SUSTAIN: Expand the diversity and inclusivity of the AZT community through outreach, relationship building, and participation in community events; Expand bilingual programs to increase engagement with Spanish-speaking youth and families.' (Page 14/16).

TERRESTRIAL AND AQUATIC WILDLIFE REPORT

Page 4 (7/14 pdf). Heading '1985 Tonto National Forest Land and Resource Management Plan.' Change heading to '2024 Tonto National Forest Land and Resource Management Plan.' Update text to be consistent with the new Tonto Forest Plan.

Page 8 (11/40 pdf). Effects of the Proposed Action heading, third para 'Wildlife and Fish Species,' Line 3: replace 'renown [sic] mule deer herd' with 'renowned mule deer herd.'

Page 35 (38/40 pdf), first para, Line 3: replace 'renown [sic] mule deer herd' with 'renowned mule deer herd.'

FIRE AND FUELS REPORT

Page 4 (7/11 pdf). Tonto National Forest heading, Line 1: replace 'Tonto Forest Plan (1985, under revision 2022)'

with 'Tonto Forest Plan (2024)'.

CULTURAL RESOURCES REPORT

Page 3 (8/59 pdf). Final para, Line 5: within the phrase 'more landscape in scale, and are less likely,' delete the superfluous word 'and'.

Page 6 (11/59 pdf). Second para, Line 3: change 'lays within the boundaries' to 'lies within the boundaries'. Sixth para, Line 2: replace "is that large portions of the trail during the initial design phase was co-located" with 'is that during the initial design phase, large portions of the trail were co-located.'.

Page 36 (41/59 pdf) and Page 37 (42/59 pdf). Cultural survey inventory map. Although the map is correct as of 2019, it would be desirable to show a 6.7-mile reroute opened in 2021, which removed the AZNST from co-location with a vehicular road and runs it instead along Alder Ridge. Such mention is desirable because the old trail alignment continues to propagate in post-2021 official documents, including this one, and could result in misdirecting future cultural surveys with out-of-date maps. The current 2024 trail alignment is shown at aztrail.org/wp-content/uploads/2018/01/25-WhiterockMesa.pdf. It is also attached to this comment as an image labeled 25-WhiterockMesa.pdf.

SCENERY REPORT

Page 3 (6/9 pdf). Comprehensive Plan heading, third para: 'The comprehensive plan identifies scenery as a significant resource and establishes desired conditions, objectives, and management practices specific to the conservation of the AZNST's scenery.' Please provide a reference to where the scenery-specific Desired Conditions, Objectives, and Management Practices are located in the Comprehensive Plan. Consider adding an explicit directive that trail maintenance and trail reroutes should maximize scenic values by opening up view corridors to the extent practicable.