Data Submitted (UTC 11): 3/25/2024 3:57:09 PM First name: Zach Last name: MacDonald Organization:

Title:

Comments: Thanks for the opportunity to comment on the Draft Comprehensive plan for the Arizona National Scenic Trail (AZNST). I am commenting as a 20 year volunteer for the Arizona Trail Association (ATA), past board member for 5 years, paid full time Trail Director for 8 years, original finisher of the AZTR300 MTB event, avid AZT hiker, biker, rider, backpacker, and advocate. Thanks for completion of the draft Comprehensive Plan and Environmental Assessment.

I appreciate the collaboration between the FS and the ATA as the primary partner organization in helping to provide direction and leadership in support of maintaining the trail and our access to it. I appreciate your consideration of all non-motorized trail users in the draft, including reference to the term bikepackers as an important consideration for extended adventures on the AZNST. I am in support of including important connecting trails in the plan, including the Wilderness bypass route int eh Santa Catalina District of the Coronado National Forest which allows a singletrack option for mountain bikes and equestrians.

The USFS should finalize definition of the Trail Planning and Management Corridor within the comprehensive plan to include at least a mile buffer from the trail to include viewshed, soundscape, current and future impacts, and planning to limit shifting baseline syndrome. A corridor width greater than the minimum of one mile wide should be included to protect the relevant scenic resources. In addition to this buffer, the comprehensive plan needs to address major threats to National Scenic Values along the AZNST in the areas of Pima, Pinal, and Coconino Counties where the trail passes through or near State Trust Land and/or Private property. More than 100 miles of the AZNST are critically threatened in these areas. The USFS and the ATA should make securing adequate buffer in these areas the highest priority for the immediate and long term future of the AZNST. The USFS and ATA should make it a priority to finish Archaeological and biological surveys and inventories for the entire length of the trail to allow for regular and continued maintenance and rerouting to repair failed fall-line segments of trail, in collaboration with volunteers, contractors, and conservation corps as efficiently and as streamlined as possible. A dedicated section for Plants is missing from the Comprehensive plan. There are more flora resources found along the AZNST than fauna, including many threatened and endangered plant species. These should be included to supplement information within this Plan.

Cattle grazing has huge impact to the AZNST. An inventory of range and pasture fences should be completed to determine which fences and gates can be removed from the trail corridor and to limit the proliferation of range fences. Similarly, it should be a goal of the ATA and USFS to limit impacts to the trail to streams and other water sources within the AZNST.

The comprehensive plan should address concerns about protecting significant resources that contribute to the nature and purposes of the Arizona Trail, including significant historical, biological, cultural resources, and dark sky status for the entire trail to preserve this aspect of the human experience at night on the AZNST. The USFS commitment to providing a full time trail administrator to help coordinate funding, maintenance, and outreach activities is critical for the success of the AZNST and ATA. Kudos to the USFS for including tribal consultation and to incorporate tribal expertise and indigenous knowledge throughout the AZNST comprehensive planning process. USFS continued support of ATA's programs to engage volunteers, youth, veterans, other partner organizations, in addition to outreach, promotion and advocacy, is commendable and should be continued.

Thanks again for the opportunity to comment on the Comprehensive Plan for the Arizona National Scenic Trail.