

November 12, 2019

Mr. Calvin Joyner, Regional Forester
Objection Reviewing Officer, Southwestern Region
USDA Forest Service
333 Broadway Blvd SE
Albuquerque, NM 87102

Subject: Objection – Tonto NF Travel Management, Draft Record of Decision
dated October 4, 2019

Dear Mr. Joyner,

Subsequent to my May 13, 2019 Comment letter in response to the Draft SEIS of April 2, 2019, I am filing an objection specifically related to FR3703 Ash Creek Bridge Road which is impacted by the Draft Record of Decision dated October 4, 2019.

The updated October 4, 2019 online Supplemental EIS Story Map indicates the full length of FR3703 as "Decommissioned/Closed," and the October 2019 Final SEIS, page 45 states FR3703 as "Decommission" under Designation and "Road is in the Superstition Wilderness" under Clarification.

FR3703 Ash Creek Bridge Road is .89 miles long from its start at Arizona State Route 88 (SR88), Apache Trail, to its termination at Ash Creek wash. The Superstition Wilderness Boundary legal description defines the part of the road within the Wilderness as "approximately 0.68 miles to the intersection with the thread of an unnamed intermittent stream," and the Supplemental EIS Story Map states "FS Route # 3703, Distance (Miles) 0.78."

My objection stems from the fact that the entirety of FR3703 Ash Creek Bridge Road is not within the Superstition Wilderness and the portion that is not within the Wilderness should be left open for public access.

The entirety of FR3703 Ash Creek Bridge Road is not within the Superstition Wilderness

It is clear from the 1984 Exterior Boundary map, the October 4, 2019 online Supplemental EIS Story Map, and the Superstition Wilderness legal boundary text description, page 4, that the Wilderness boundary intersects the FR3703 Ash Creek Bridge Road about .21 miles south of the intersection with SR88. And, the boundary then follows the FR3703 Ash Creek Bridge Road .68 miles to the bridge abutment at Ash Creek wash, which is the local name for this watercourse. The first .21 miles of FR3703 from SR88 is not in the Superstition Wilderness.

Please see Maps A, B, C and Document A.

FR3703 Ash Creek Road is not unsafe

The FR3703 Ash Creek Bridge Road was originally built in 1903-1904 as part of the Mesa-Roosevelt Dam Road, now SR88, or the Apache Trail. It was constructed to haul heavy wagons full of equipment and supplies to the building site of the Roosevelt Dam and as such was designed as a wide thoroughfare to support the substantial weight hauled over it. It also had several turnouts for wagons to pass each other. FR3703 Ash Creek Bridge Road has retained its structural integrity for over 100 years and remains usable to many vehicles.

FR3703 Ash Creek Road features several travelability aspects. It is an all-weather road 20 to 35 feet in width and is wide enough in many places for two vehicles to pass as it has 11 turnouts in its short .89 mile length. The road has no signs of adverse erosion and is easily drivable with a high-clearance vehicle. Some passenger cars may be able to use it also.

FR3703 Ash Creek Road is not unsafe. Please see Photos A, B and C of vehicles on this road.

It is unsafe to park along SR88 for access to the Superstition Wilderness

FR3703 Ash Creek Bridge Road allows hikers, hunters, and recreation users access to this northern area of the Superstition Wilderness. From the end of FR3703, the Ash Creek Bridge Trail (a historic trail) goes up to the ridge overlooking Tortilla Creek and connects with other trails-of-use that run in both directions along the ridge. The public often uses FR3703 Ash Creek Bridge Road and these trails to access the Tortilla Creek area.

If FR3703 Ash Creek Bridge Road is closed to vehicles, the public will have to find other places to park and several difficulties will result—unsafe parking along the shoulders of the SR88 roadway, requirements for installing no parking signs at the closure and along the highway, construction and maintenance of closure barriers, and enhanced enforcement and patrolling. Closure of the entirety of FR3703 will create an unsafe parking environment along SR88 and more work for the Forest Service.

Please see Photos D and E.

Proposed Compromise Solution

Keep FR3703 open to the public for the .21 miles from SR88 to the start of the Wilderness boundary. At the point where FR3703 enters the Wilderness is a flat open area for safe parking, plus several turnouts along the .21 mile non-Wilderness stretch offer the public a safe place to park off the main highway.


Please see Photo F.

I request that non-Wilderness portion of FR3703 Ash Creek Bridge Road to remain open to public

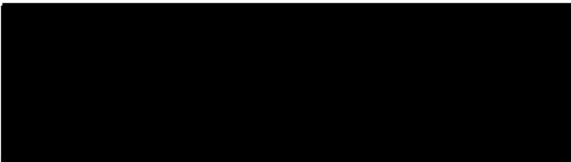
The first .21 miles of FR3703 from SR88 is not in the Superstition Wilderness. FR3703 Ash Creek Road is not unsafe and is easily accessible. It is unsafe to park along SR88. FR3703 offers a place to park off SR88 highway for public access to the Superstition Wilderness.

Keeping the first .21 miles of FR3703 open to the public will allow safe off highway parking with access to the Superstition Wilderness.

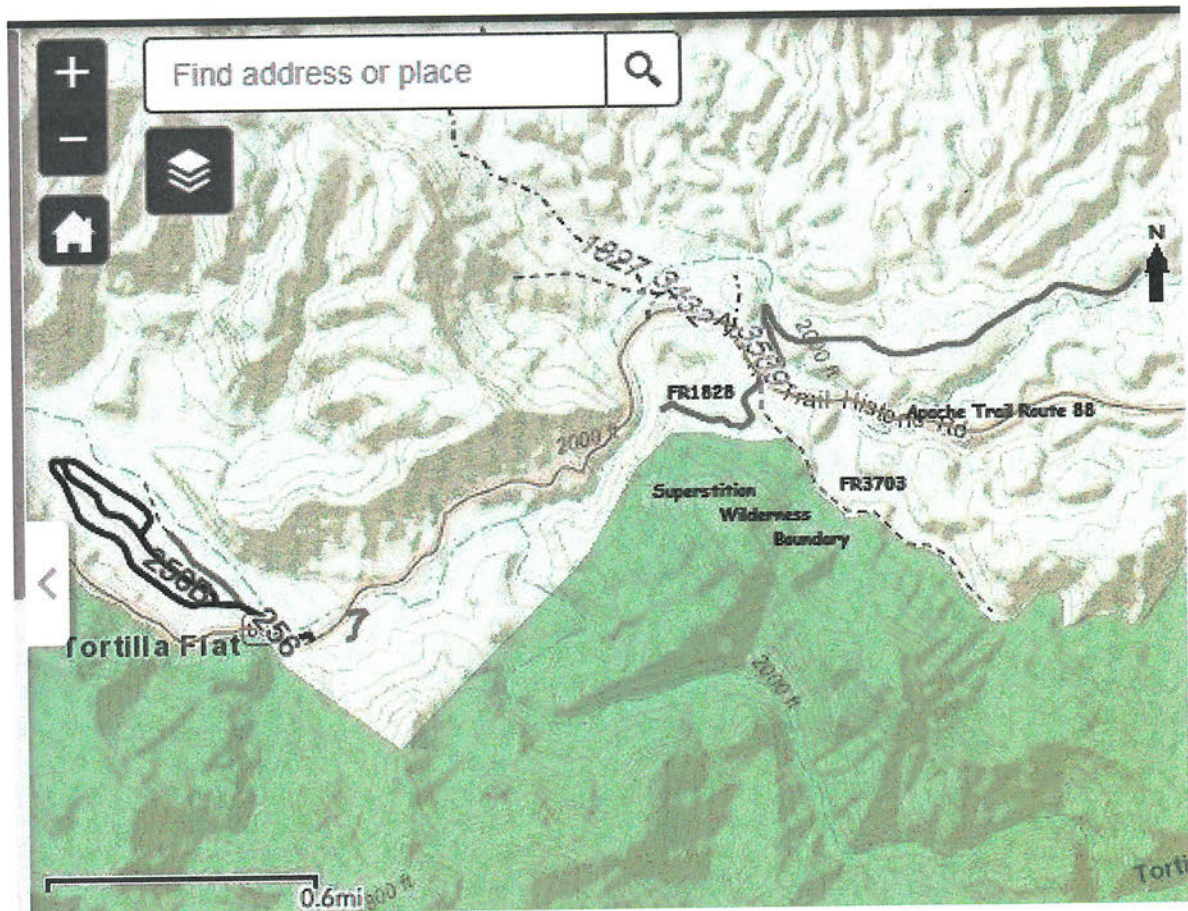
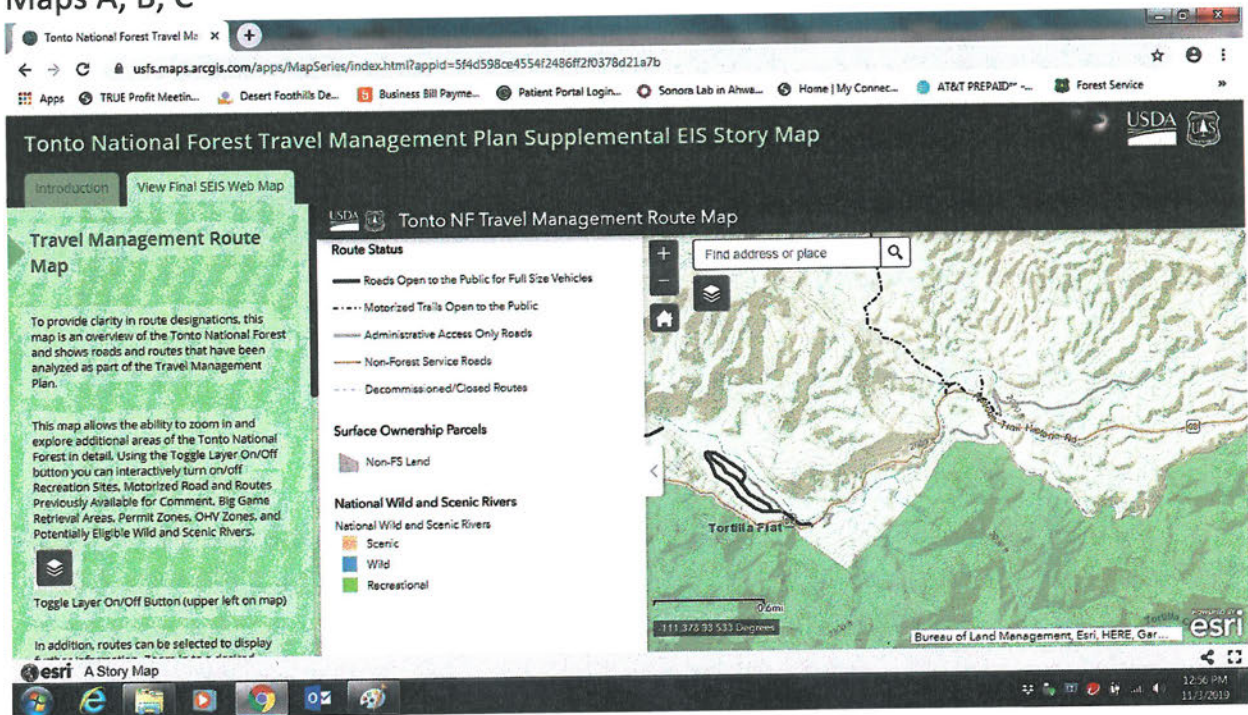
Sincerely,

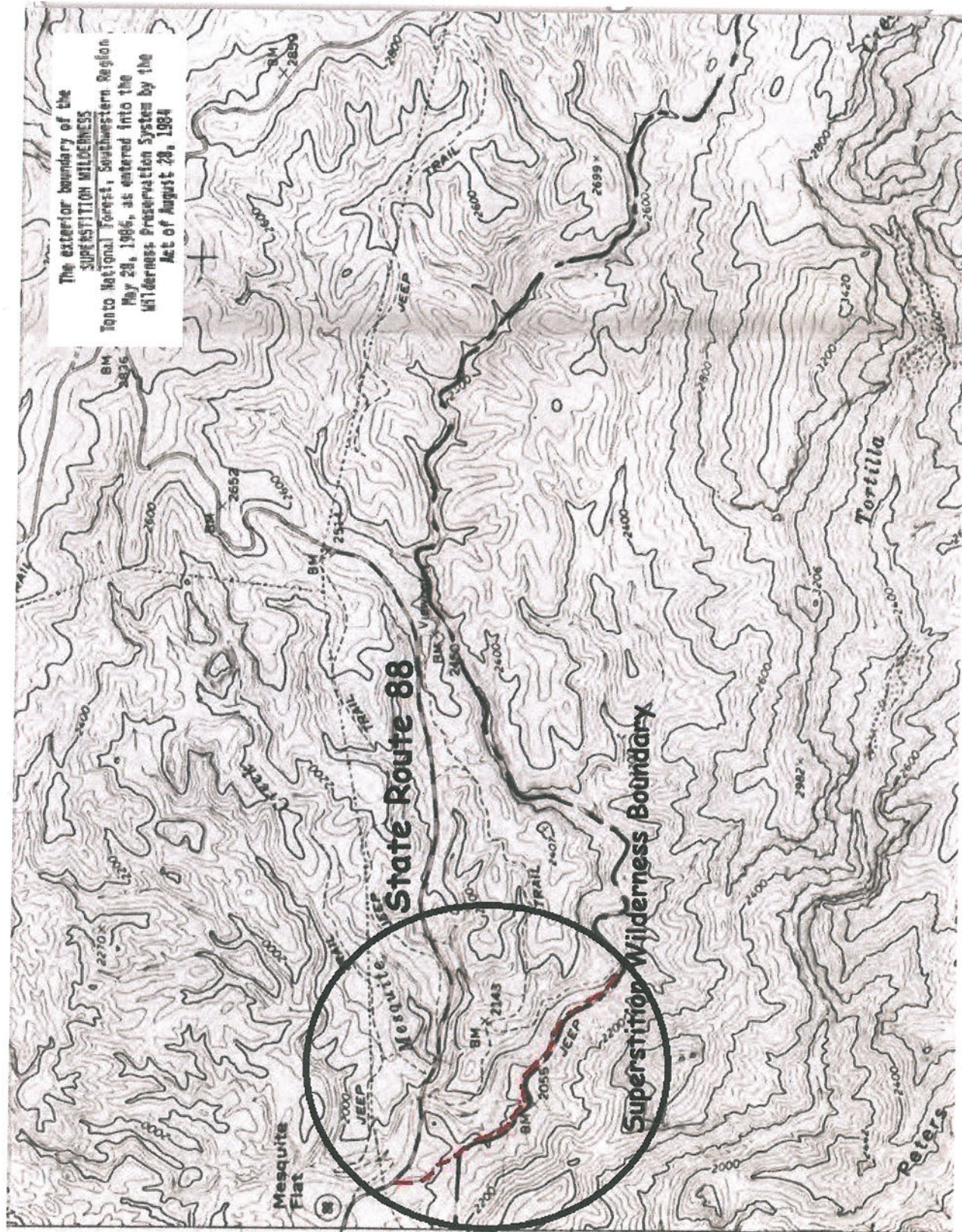


Steve Bowser



Maps A, B, C





Document A

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ASH CREEK
ROAD →

Thence, S 88 E on a straight line for approximately 0.26 miles to the intersection with the centerline of a trail;

Thence, southeasterly on the centerline of said trail for approximately 0.68 miles to the intersection with the thread of an unnamed intermittent stream;

Thence, northeasterly, easterly and southeasterly on the thread of said intermittent stream for approximately 3.39 miles to the intersection with the thread of a wash, at an approximate elevation of 2880 feet;

Thence, southeasterly on the thread of said wash for approximately 0.23 miles to a point 33 feet west of the centerline of FDR No. 213;

Thence, southeasterly on the line 33 feet right of and parallel to said centerline for approximately 1.87 miles to a point 33 feet west of the centerline of the westernmost portion of the terminal loop of said FDR No. 213;

Thence, counterclockwise on the line 33 feet right of and parallel to said terminal loop centerline for approximately 1.22 miles to the intersection with the line 33 feet east of and parallel to the centerline of the main portion of said FDR No. 213;

Thence, northwesterly on the line 33 feet right of and parallel to the centerline of said FDR No. 213 for approximately 2.38 miles to a point 200 feet south of the centerline of State Highway No. 88;

Thence, northeasterly on a line 200 feet right of and parallel to said highway centerline for approximately 0.70 miles to a point 200 feet south of the centerline of a power line;

Thence, N 82 1/2 E on a straight line 200 feet right of and parallel to said power line centerline for approximately 0.21 miles to a point 200 feet west of the centerline of said Highway No. 88;

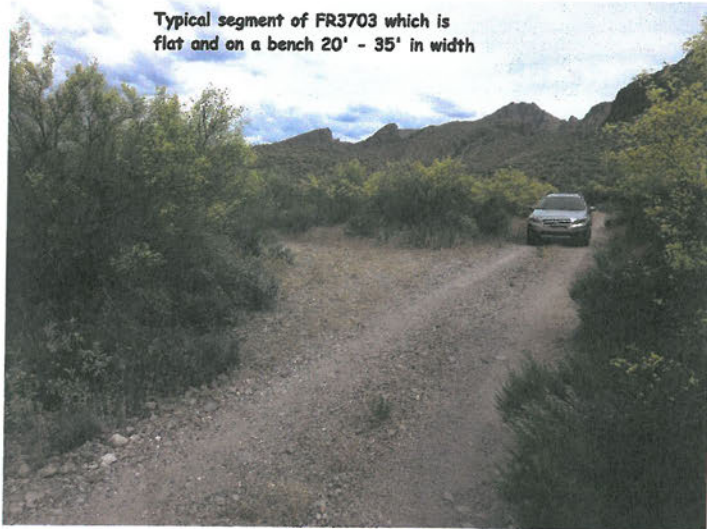
Thence, southerly on a line 200 feet right of and parallel to said highway centerline for approximately 0.75 miles to the intersection with the thread of Fish Creek;

Thence, N 35 E on a straight line for approximately 0.11 miles to the summit of a small knob with a contour elevation of 3000 feet;

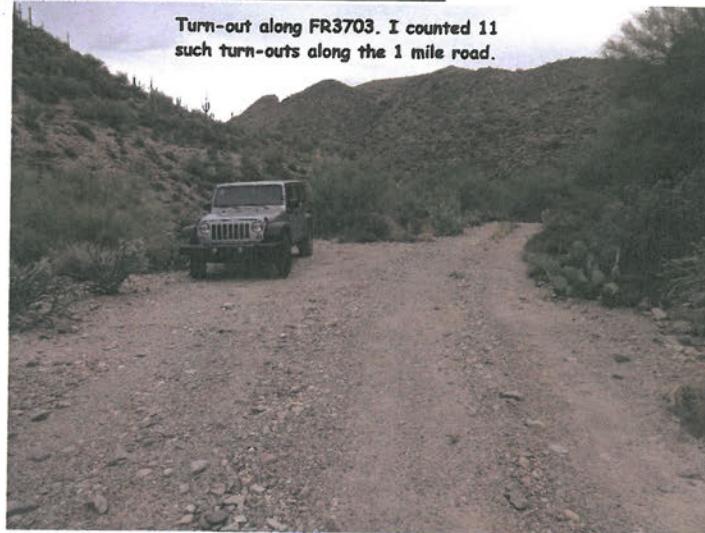
Thence, N 34 E on a straight line for approximately 0.07 miles to the summit of a small knob with a contour elevation of 3160 feet;

Photos A, B, and C

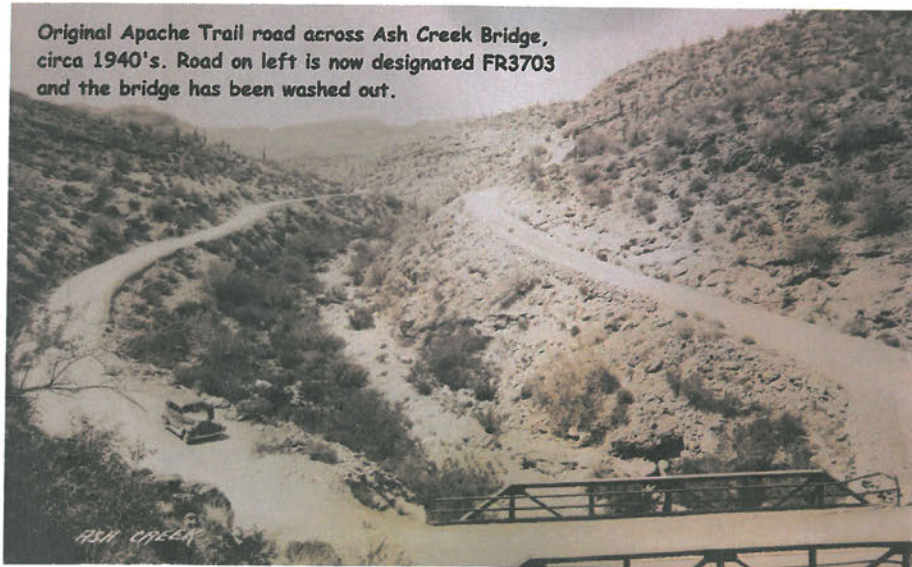
Typical segment of FR3703 which is flat and on a bench 20' - 35' in width



Turn-out along FR3703. I counted 11 such turn-outs along the 1 mile road.



Original Apache Trail road across Ash Creek Bridge, circa 1940's. Road on left is now designated FR3703 and the bridge has been washed out.



Photos D and E

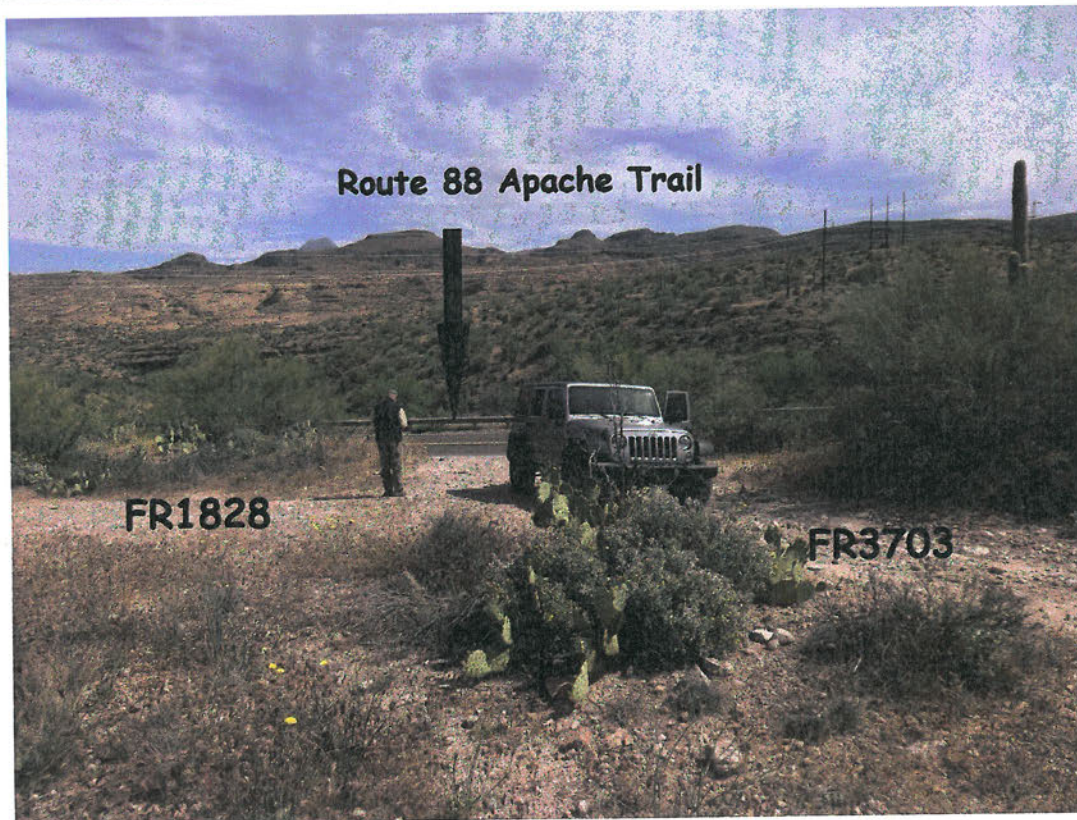
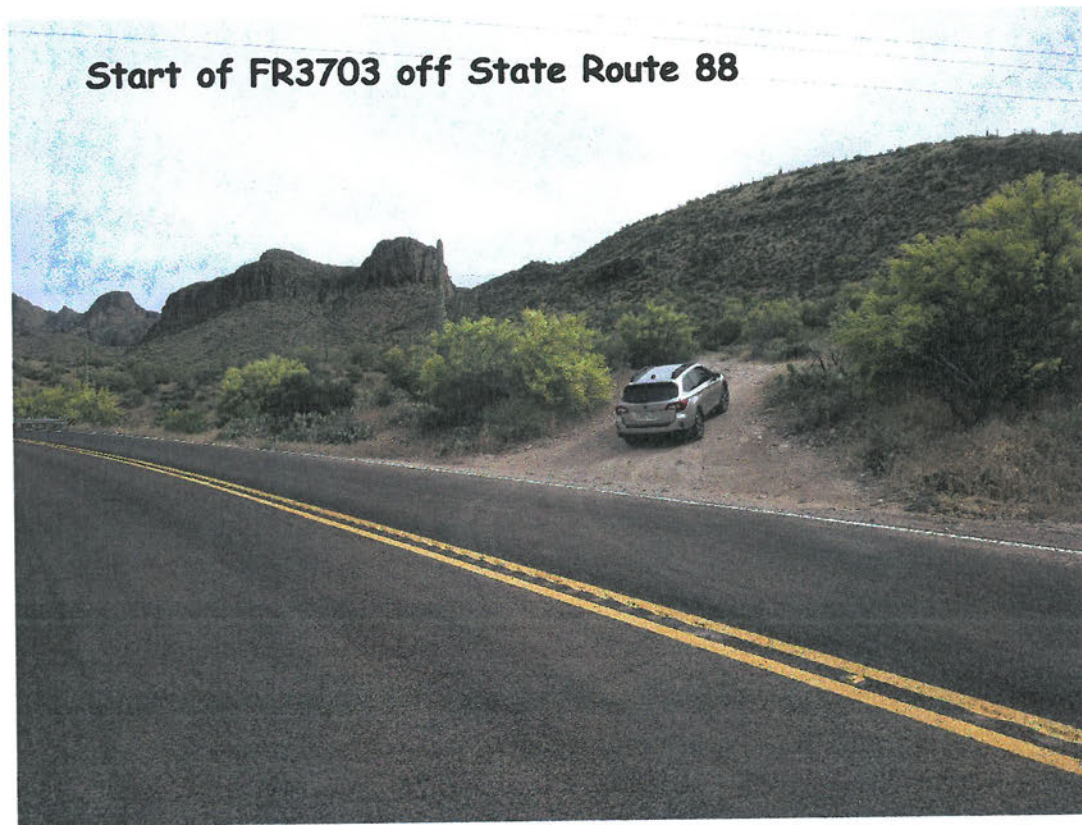


Photo F

