


Arthur Rogers



6 November 2019

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

Subject: Comments and Objections regarding portions of the Travel Management on the Tonto National Forest Final Supplemental Environmental Impact Statement (FSEIS) and draft Record of Decision (ROD) for the proposed Travel Management project.

SENT VIA USPS CERTIFIED RETURN RECEIPT AND ELECTRONICALLY

Dear Mr. Joyner:

This letter contains my comments and objections for the Final Supplemental Environmental Impact Statement (FSEIS) and draft Record of Decision (ROD) on the Tonto National Forest travel management.

I have been involved continuously with providing public comment to the development of this travel management plan. I have previously provided comments and raised objections via both written comment and personal visit. Written comments were submitted on 24 November 2009, 30 January 2012, 1 March 2012, 15 July 2014, 30 June 2016, and 10 May 2019. I have provided direct personal input to USFS officials at public meetings on 18 November 2009, personal meetings/hearings at the Phoenix office, and other times via one-on-one personal conversations with individuals directly working on this project. I have also participated in the local Trails working group sponsored by the Tonto NF, Town of Payson, Town of Star Valley, and local hiking, cycling, equestrian, and motorized groups

My comments/objections fall into two categories which are (1) omissions of any motorized trails to the southwest of the Town of Star Valley including factual errors and faulty information in the FSEIS and ROD and (2) a disagreement with regard to the administrative designation of FS435 (Granite Dells Road).

1. The omission of any motorized access to the south and west of the Town of Star Valley is a continuing flaw in this report. The current Boulder, Monument, and Cypress trails are all in this area which is currently authorized motorized. These three trails are proposed to be changed from motorized to non-motorized. This proposal will eliminate all motorized trails to the south and west of the Town of Star Valley.

The FSEIS Appendix A, Response to Comments, on page A-26 states "*The three trails were not designed for motorized use,...*". The statement is not correct as all three trails are a part of the Payson Area Trail System (PATS) and have been designated and designed for motorized use since the development of the PATS system decades ago. The USFS was a participating partner in developing the PATS system.

Also on page A-26 is the statement "*The photos of the Monument trail displayed in the DSEIS were taken near the intersection with FR 435, which is over 0.5 miles from the golf course...*". That response indicates a probable confusion by the writer between photos of erosion at the Monument parking trailhead at FR435 (caused by truck, equestrian trailers, etc) which is 0.5 miles from the golf course, and the photos of erosion on the trail itself (not located on FR435) which can be corrected via minor trail realignment.

On page A-27 are new photos (figures 3, 4, 5, 6) which have nothing to do with parking access for the Monument trail yet the comments at the bottom of A-26 and top of A-27 imply it does. The figures 3 to 6 photos show an area of heavy full size 4WD vehicle damage. That area is used by overnight RV and 4WD vehicle campers and day use 4WD users who negligently damage the field shown in figures 3 to 6. The users of the Monument trail do NOT park or use this spot on FR435. They instead park to the northwest of this location where the access for the Monument trail starts. This faulty understanding by the Response writer, shows a lack of understanding of where different forest users are located and use the forest.

The Response comments regards figures 3, 4, 5, 6 are also directed to the administrative designation of FR435 and will be discussed by me in part 2.

At the bottom of page A-29 is the following response: *The Boulder trail, as it is currently aligned, trespasses on private property. The Forest cannot authorize use on private property without an easement. At this time we do not have an easement for motorized us(sic) on the Boulder trail...* This statement is misleading for several reasons. First only a very short segment of the Boulder Trail is on private property which travels through a small private lot to the Phoenix street area in Payson. That short segment is already currently designated non-motorized and control gates are present to prevent access by motorized vehicles. This very short segment of private land does NOT effect the current motorized use of the Boulder Trail. Current access to the Boulder Trail for motorized vehicles is available via the Cypress trail PATS authorized trails. Contrary to what the Response says, the Forest does not need to authorize any use of private property to keep the Boulder or Monument trail motorized.

Continuing on the bottom of page A-29 is this response: *or to connect the Monument trail to Star Valley. To correct this, a new segment of trail would need to be constructed. This trail*

construction would need to be a project specific action through NEPA. The section of trail that is proposed to connect the Monument trail to Star Valley would also require NEPA for new trail construction, which is outside the scope of the SEIS.

The statement is partially false as the Monument trail is currently connected to Star Valley via the access point on FR435 (Granite Dells Road). Of course a better connection would be a very short connection to Moonlight Drive on public land but such a connection is outside the scope of this process. However just because the best connection is not possible at this time is not a valid reason for prohibiting continued motorized travel on the Monument trail.

2. The administrative designation of a portion of FR435 (Granite Dells Road) prohibiting public vehicle access is contrary to the public interest. The reasons for this administrative designation have changed with different proposals over the years. At times it was related to road storm erosion, then to trespassing problems for a private property owner, and now the latest (and new) reason is due to erosion shown in figure 3, 4, 5, 6, starting at page A-27 of the FSEIS Appendix A, Response to Comments.

On page A-29 is the following Response: *The administrative use on the last segment of FR 435 is proposed because resource concerns dictate closing Cypress, Boulder, and Monument trails to motorized use. Therefore, it makes little sense to leave a road open that dead-ends at a private parcel. With public access ending at the Monument trailhead, the remainder of the route would be solely for private benefit, and motorized use on that road will be issued under special use permit*

I strongly disagree with these comments especially that it makes "little sense to leave a road open that dead-ends at a private parcel". That response implies this road simply ends at a gate to private property. At the end is public USFS land containing a beautiful open plateau with trees formerly used for day use picnicking, photography, and general enjoyment.

What the last sentence of the Response says above is correct. It says "...the remainder of the route would be solely for **private benefit**...(emphasis added)". My view is that is just wrong. This portion of FR435 should not be solely for private benefit but open to all the public including those who need motorized vehicles for access (seniors, handicapped, etc.).

SUMMARY: I know this process has been a long one. But just because this has taken longer than anticipated should not be a cause to rush to conclusion. Please make needed changes to the proposal to fix the identified errors and flaws. Thank you.

Sincerely:

