



November 15, 2019

Tonto National Forest
Attention: Calvin Joyner – R3 Regional Forester

Submitted Electronically via email to objections-southwestern-regional-office@usda.gov

Subject: Tonto Recreation Alliance Objections to the Draft Record of Decision and Final Supplemental Environmental Impact Statement – dated October 4, 2019

Dear Mr. Joyner:

Please find below comments from the Tonto Recreation Alliance (TRĀL) on the Final Supplemental Environmental Impact Statement (“FSEIS”) issued by USFS in October 2019.

STANDING TO FILE COMMENTS

TRĀL has submitted comments at every phase of the Tonto Forest’s Travel Management process. This includes a specific set of objections to the Draft Record of Decision which were to be addressed during the DSEIS phase. Therefore, TRĀL has standing to bring these objections regarding forward.

Objector Contacts:

Richard Smith (Lead)
President, Tonto Recreation Alliance
8110 S. College Ave, Tempe, AZ, 85284
480-213-5826
rich_smith@cox.net

Steve Speak
Vice President, Tonto Recreation Alliance
8130 E. Williams Drive, Scottsdale, AZ, 85255
(480) 797-4560
speak501@cox.net

SUMMARY OF ISSUES AND OBJECTIONS

TRĀL is submitting comments to the Final Supplemental Environmental Impact Statement (FSEIS) grouped into 3 sections described below. These comments have been developed in partnership with Arizona Off-Highway Vehicle (AZOHVC) Coalition who fully endorses the contents of this submission. AZOHVC may submit additional comments separately.

Section 1 - Objections for Mesa Ranger District

Section 2 - Objections for Tonto Basin Ranger District

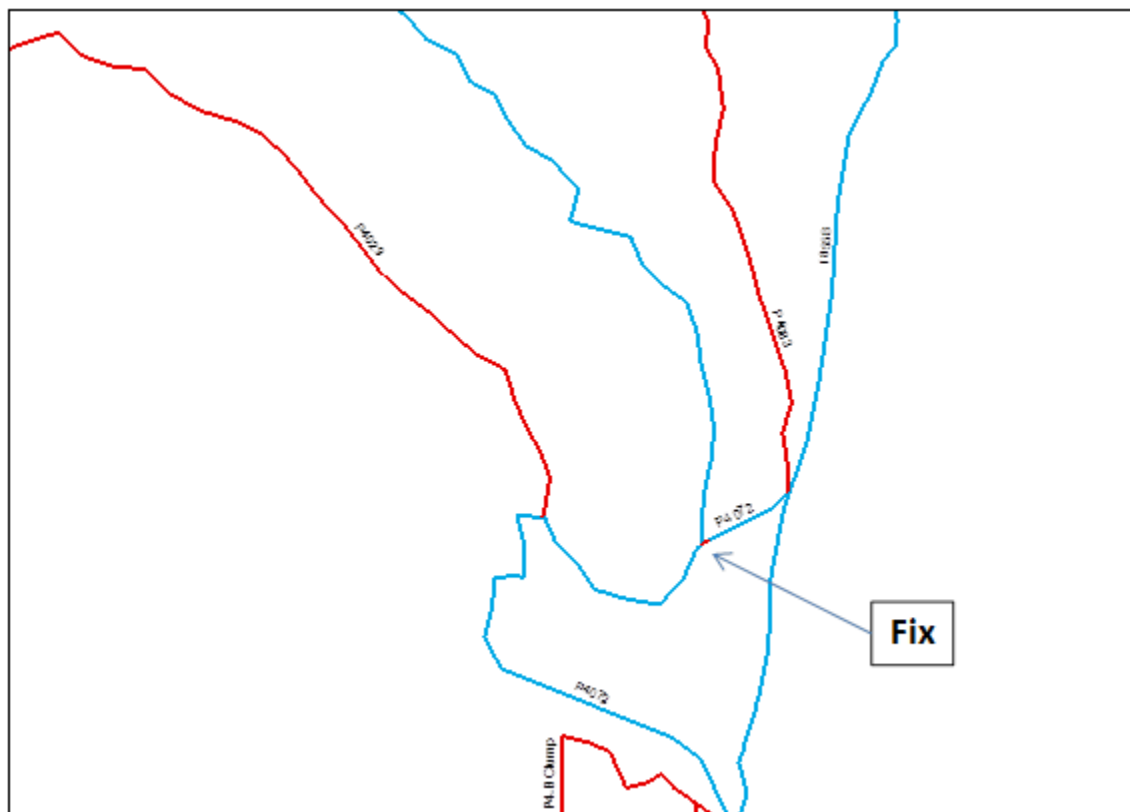
Section 3 – Specific Route Objections for the Cave Creek District.

Section 1 – Objections for the Mesa Ranger District

TRAL filed comments on the DSEIS on September 17, 2014 and the objections in this document represent comments not addressed through the subsequent travel management process to date.

Sugarloaf Motorized Trail Error - There appears to be an error in the GIS database on one section of route P4072. The northern part of this ATV route is shown in the Alternative 2 map as open for Motorized Trail but a small section on the southern end which connects the route to FR1855 is shown as closed.

Specific Request - Correct the GIS database and maps to designate P4072 as open for all vehicle types all the way to FR1855.



Specific request - Change coding of P3010 and P3009 from ATV/Motorized Trail to Motorcycle Trail (change from Scoping code 3 to 2 in GIS database). Change P3003 from Motorcycle Single Track to ATV/Motorized Trail (Code 3).

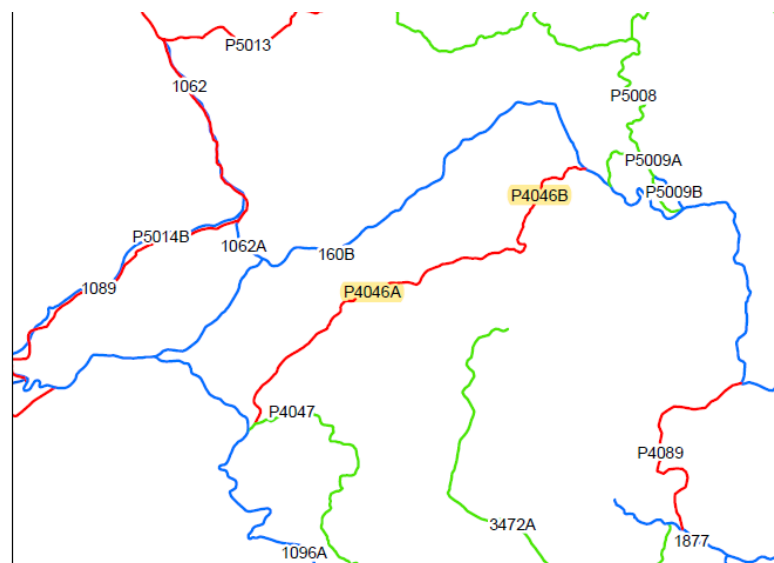
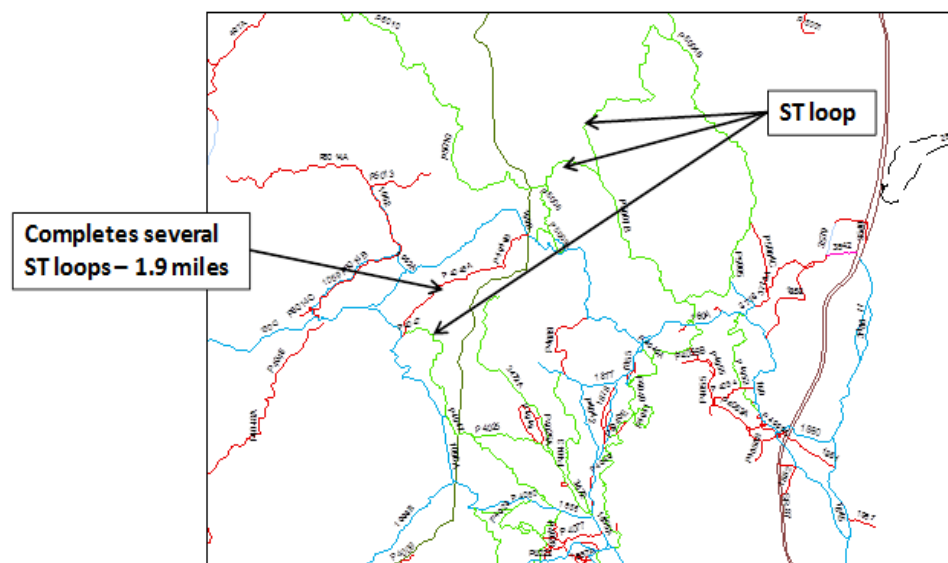


Specific Request – Change segments P5006 and P4058 from ATV/Motorized Trail to Motorcycle Trail (code 3 to 2)

The following objection was a comment originally submitted in TRĀL's comments dated September 17, 2014 that has not been addressed in the travel management process.

Upper Two Gates Trail - There is an important section of single track motorcycle trail that is currently proposed to be closed consisting of P4046A and P4046B (commonly called Upper Two Gates trail). The route is part of a very popular motorcycle single track loop in the Sycamore Creek route system. With this segment of motorcycle single track missing, the loop is incomplete and leaves dangling segments on both ends. Closing this segment is completely illogical given the decision to keep the single track trails on both ends of it open.

Specific request - TRĀL requests that P4046A and P4046B be changed from Decommissioned to Motorcycle Trail.

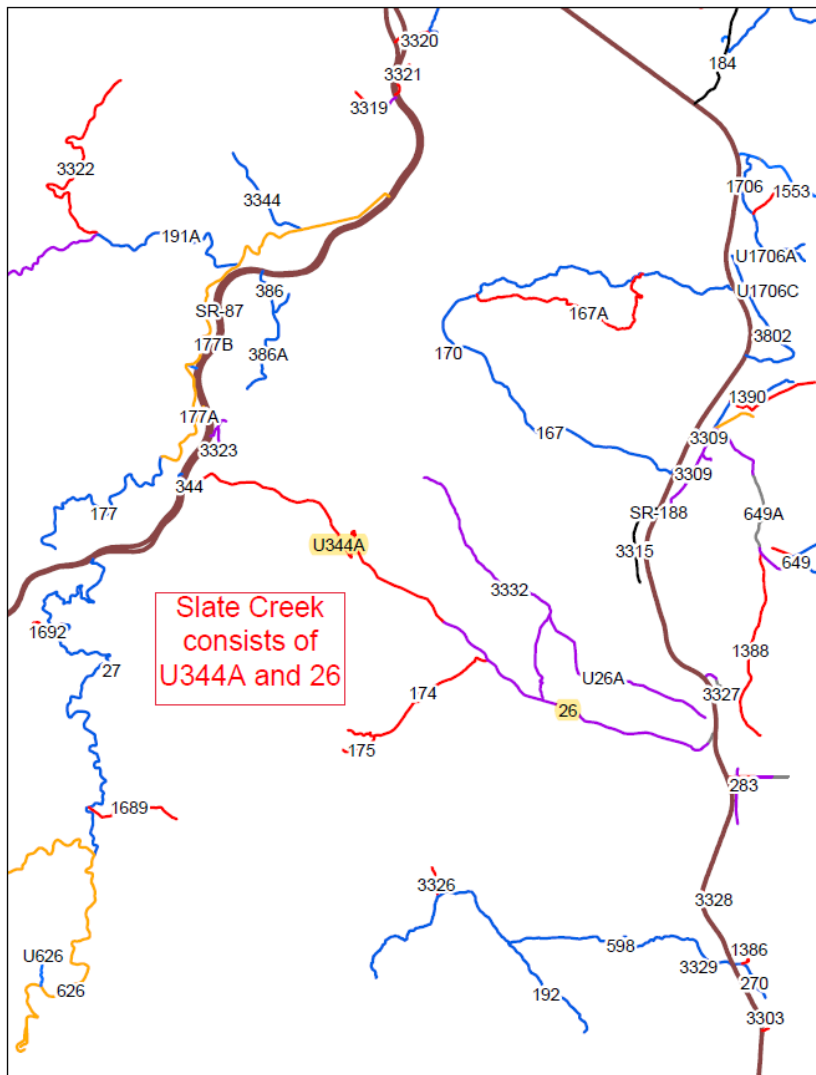


Section 2 – Objections for the Tonto Basin Ranger District

The following objection was a comment originally submitted in TRĀL's comments dated September 17, 2014 that has not been addressed in the travel management process to date.

Slate Creek – Route

First, we believe that the numbering of Slate Creek may be incorrect. From the history of the Slate Creek route it seems almost certain that the combination of what is being called U344A and 26 should be 26 for its entire length. This stretch was part of the original Bush Highway connecting the Phoenix area to Payson. TRÅL has started working with the Tonto National forest on a set of projects that, in addition to enhancing the OHV recreation experience, would help to preserve more of the forest and state's history. The fascinating history of Slate Creek is a big part of why TRÅL would like to see this route left open for motorized travel.



Map showing the routing of the Bush Highway through Slate Creek.

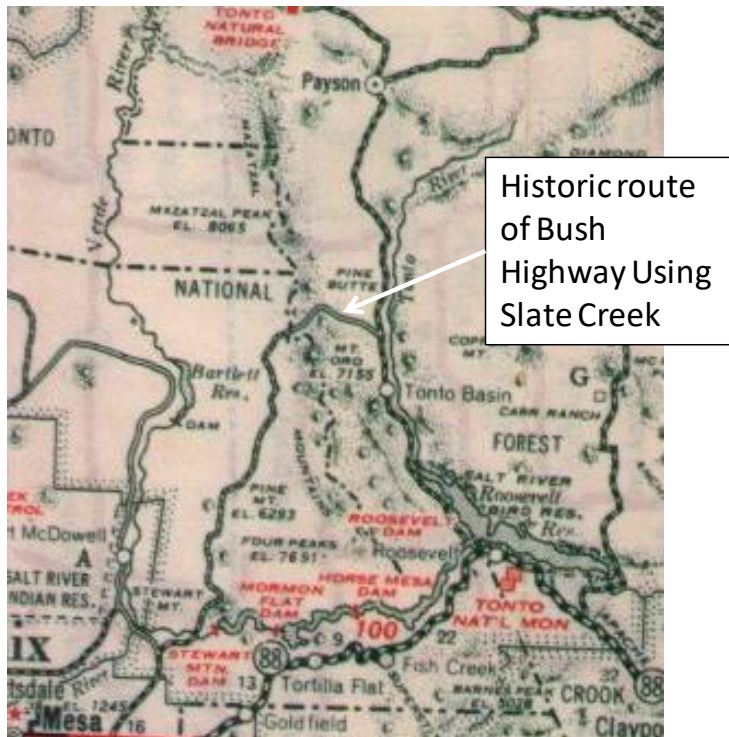


Photo below shows work being done on the Slate Creek section of the Bush Highway.



Equipment used in 1937 to build a road through wash during the construction of the Slate Creek portion of Bush Highway was not much different than that being used today. The photo was taken by Charles Cunningham, April 29, 1937. – Source Payson Roundup article – Tim Ehrhardt – January 23, 2013.

Slate Creek composed of U344A and 26 is also completes an interesting loop including Log Corral Wash (3456), Powerline Road (393), Mt Ord (626), back side Mt Ord (27), Slate Creek (U344A & 26), SR-188 to Punkin Center and 143 over Four Peaks.

Specific Request – Change U344A and 26 from Decommission to Motorized Trail. Evaluate changing U344A to 26.

Section 3 – Objections for the Cave Creek Ranger District

TRĀL's comments for Cave Creek are limited to a specific list of route issues that have a material impact to the quality of the route system, its impact on the Forest or "implementation" issues. In general the issues can be grouped into three types:

- 1) Changes that were agreed to in the DSEIS but not implemented into the DROD GIS data layer / Story Map.
- 2) Changes to correct vehicle use coding or use designation. We appreciate the Forest's efforts to make sure the vehicle use coding and use designation matches the District Ranger's decision and the actual ground truth in the field. We have found a small number of issues remain. While these issues may eventually be corrected through annual review/update to the MVUM, it makes best sense to get the coding as accurate as possible in the baseline/DROD MVUM. TRĀL stands ready to assist in the process using our ARC GIS Collector Data Base and the full system route inspection that has been completed by TRĀL volunteers over the last several years.
- 3) While we have collectively worked to insure all routes subject of the objection process have been properly resolved and incorporated to the GIS database, there are several issues that still remain. These can be generally grouped into three categories:
 - a. Routes designated as decommission which leave gaps in other connecting trails making them practically unusable to the rider.
 - b. Routes that are an important part of the trail system that were designated as open in the DSEIS but changed to decommission in the DROD/FSEIS
 - c. Route decisions that do not match or make sense considering field based data or how the routes are actually intended to be used by riders. In at least one case the route decision is expected to lead to rapid new trail creation in the area adjacent to a decommissioned trail.

We are providing details of these changes and the proposed remedy for each issue in attached table and accompanying reference maps.

- Table – FSEIS - Table 11 - Cave Creek Route Table
- Reference Maps (4): U3075, U3035, U3090 and U2256 & U2256A

Sincerely,



Richard Smith

President, Tonto Recreation Alliance

Attachments:

Attachment 1: FSEIS - Table 11 - Cave Creek Route Table

Attachment 2: Map U2256 – U2256A

Attachment 3: Map U3035

Attachment 4: Map U3075

Attachment 5: Map U3090

Cave Creek District
DROD/FEIS Route Designation (FSEIS, Table 11) Versus Forest Supervisor Decision in DSEIS 9 (DSEIS Table 9)*

Route Number	Area	DROD/FSEIS Designation	Agreed Upon Change in DSEIS (Table 9)	TRĀL Review, Objection and Requested Resolution Note: Route number comments in RED were included in TRĀL's DSEIS Objection Dated May 20, 2019 but were not addressed or implemented in the FSEIS/DROD
U3085	Wildcat	Decommission	60-inch Trail	Confirmed
U3089	Wildcat	Single Track Trail	Decommission	Confirmed
U3088	Wildcat	Single Track Trail	60-inch Trail	Confirmed
U3089	Wildcat	Single Track Trail	60-inch Trail	Confirmed
U3088	Wildcat	Decommission	60-inch Trail	Confirmed
U3053	Wildcat	Full Size Trail	Single Track Trail	Confirmed
U3052	Wildcat	Full Size Trail	Single Track Trail	Confirmed
U3051	Wildcat	Decommission	Single Track Trail	Confirmed
U2268	Wildcat	Decommission	Single Track Trail	Confirmed
FR513	Wildcat	Full Size Trail	60-inch Trail	Confirmed
FR2090	Wildcat	Full Size Trail	60-inch Trail	Confirmed
U3073	Wildcat	Decommission	Single Track Trail	Confirmed
U3075	Wildcat	Decommission	Single Track Trail	Agreed change in DSEIS not made in DROD/FSEIS story map. No rational provided for changing this route back to decommission from open – ST so it is assumed that this is an error translating the DR decision into the GIS data (see U3075 map detail)
T619	Wildcat	Unauthorized	Single Track Trail	Incorrectly coded as full size route in DROD story map
U3035	Wildcat	Decommission	Open – single track, TRĀL Objection #19	DROD/FSEIS shows as decommission but decision in DSEIS was to designate open-single track. Closing this trail leaves a highly popular route with a gap between segments. (see U3035 map detail)
U3090	Wildcat	Decommission	Requested Open-single track, TRĀL Objection #5	It appears that this was missed in the objection review as it was part 2 (of 2) items listed for Objection #5. (see U3090 map detail). Request that a full review of TRĀL's objection be completed.
U2256A/U2256	Wildcat	Decommission	Open - single track TRĀL Objection #24	Agreed change in DSEIS not made in DROD/FSEIS story map. Please note that this decision leaves several routes dead-ending into U2256 with no outlet. U2256 provides an outlet to FR413 and U2256A (Ref TRĀL Objection #24 DSEIS)
U2259 & U3024	Wildcat	Decommission	Open – single track, TRĀL Objection #28	Agreed change in DSEIS not made in DROD/FSEIS story map. No rational provided for changing this route back to decommission from open – ST so it is assumed that this is an error translating the DR decision into the GIS data. (Ref TRĀL Objection #28)
T221/ID2154	Wildcat	Open – full size	Open – single track	FSEIS story map still shows this route as full-size,

*Please reference TRĀL Objection Comments for Cave Creek District submitted May 20, 2019

Cave Creek District
DROD/FEIS Route Designation (FSEIS, Table 11) Versus Forest Supervisor Decision in DSEIS 9 (DSEIS Table 9)*

U2115	144 th Street	Decommission	Single Track Trail	Unable to locate on Story Map
FR2115	144 th Street	Full Size Trail	Decommission	Note District Ranger is actively studying route access from the Rio Verde Area. Suggest reconfirming with the District Ranger his plans for this route.
2124	144 th Street	Open-full Size Trail	Change to open 60"	This trail was recently evaluated by field visit and is currently single track width. It only connects to single track trails so there is <u>no reason to designate this as a full-size trail.</u> (Trail Objection #31). <u>Please revise decision to open – ST.</u>
2124A	144 th Street	Decommission	Designate as open until a suitable alternative route can be constructed or these trails can be repaired.	<p>This short connector trail is heavily used to connect the upper plateau (2123) with the lower camp creek wash area (414, 2124, etc.). The trail has significant erosion but is readily rideable by SxS and dirt bikes. Closing this connector will force riders to make a long detour either to 144th street/2123 or down the wash to 413 and up U2219 (which is also has experienced significant erosion).</p> <p>It is expected that rather than taking one of the less preferred / longer routes riders will create new trails in the vicinity of 2124A. This is highly likely for dirt bike riders wishing to access 2124 since 2124A connect directly to 2124.</p> <p><u>During previous route discussions the DR agreed to leave both the 2124A and U2219 connectors open until a better solution could be developed or these trails could be repaired with increased sustainability.</u> To protect from additional resource damage we request leaving 2124A route open until a holistic solution to access connections between the upper plateau and lower Camp Creek Wash area can be developed.</p>
T1088	144 th Street	Open – full size trail	Single track trail	This appears to be an error. While T1088 is a ~60" wide trail there is no way for a 60" or larger vehicle to access this trail. All connections are to single track trails. <u>It makes best sense to classify this as a single track trail for this reason.</u>
T4227	144 th Street	Open – full size trail	Single track trail	This appears to be an error. There is no way for a 60" or larger vehicle to access this trail as all connections are to single track trails. <u>It makes best sense to classify this as a single track trail for this reason.</u>
U2215 (ID4482)/U2215 A (ID) &U2215B (ID5260)	144 th Street	Decommission	All three route segments were designated as open-single track in the DSEIS but not changed in the DSEIS GIS data.	No rational provided for changing this route from open to closed so it is assumed that this is an error translating the DR decision into the GIS data. (Ref TRĀL Objection #34). These route segments are considered technical challenge sections for single track users and provide connection to 413.
U2218 (ID4455)	144 th Street	Decommission	Designate as open-full-size and change route number to 2123	No rational provided for changing this route from open to decommission so it is assumed that this is an error translating the DR decision into the GIS data. This recommendation reflects the real/ground-truth route for FR2123 and directing traffic to the proposed route will be difficult/impossible. See next item (Ref TRĀL Objection #32)
2123 (ID1180)	144 th Street	Open-full size	Open-single track (but it should be open-60")	This is not the current routing of FR2123 as noted on the story map. It is actually a 60" route that provides connection to several north/south routes. The route was left in the system because it has a totally different character than the main 2123 route (much higher difficulty and more technical challenge due to being very rocky) and it provides connectivity to multiple north/south trails without. It would be difficult for stock full-size vehicles to travel this route which is best suited for 60" or less SxS/ATV and dirt bikes. (Ref TRĀL objection #33).

*Please reference TRĀL Objection Comments for Cave Creek District submitted May 20, 2019

Cave Creek District
DROD/FEIS Route Designation (FSEIS, Table 11) Versus Forest Supervisor Decision in DSEIS 9 (DSEIS Table 9)*

FR388	St. Clair	Administrative Trail	Decommission	Confirmed
FR2064	St. Clair	Single Track	Full Size Trail	Confirmed
Unauthorized	St. Clair	Decommission	Administrative Trail	Cannot confirm – don't know which route this refers to
2200/2201	St. Clair	Decommission	60-inch Trail	Confirmed
FR1064	St. Clair	Decommission	Administrative Trail	Confirmed
1117	St. Clair	Did not authorized south leg of 1117 loop constructed with AZSP grant	Open-full size	<p>The proposed resolution of this issue (specifically creating a loop connecting with FR19) is very problematic in that it requires the installation and maintenance of a "permit area quality" gate, lock and additional signage because St. Clair is a designated permit zone with tightly controlled access. There are no current plans for this cost in any Cave Creek OHV Planning activity that I am aware of. The reason the original trail back to Indian Springs Wash (FR532) was constructed was to avoid these issues and avoid creating an access gate on Bartlett Dam Road which has a high traffic level at times.</p> <p>Since the work was performed under an Arizona State Parks grant there had to be a NEPA analysis that authorized the work that created the route. Without that Forest would not have allowed the work nor would AZSP have provided any funding. The route does in fact exist on the ground. It is visible in google earth (GPS track has been sent to Forest multiple times) and it has been inspected by TRÄL's ADAT Team multiple times.</p> <p>If additional analysis is required TRÄL recommends that the best decision here is to defer any decision on the FR19 gate access until further analysis is completed.</p>

*Please reference TRÄL Objection Comments for Cave Creek District submitted May 20, 2019

U2256A and U2256 Route Issue (TRAL Objection #24)

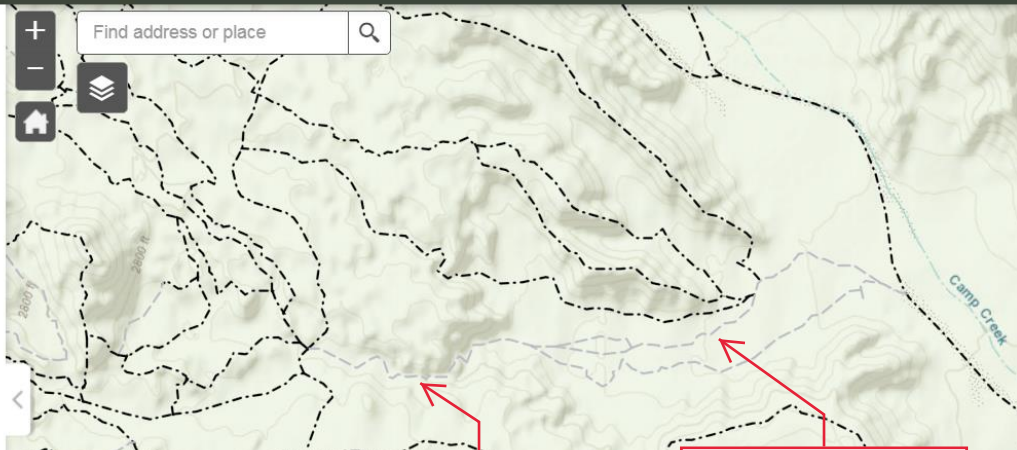
Surface Ownership Parcels

 Non-FS Land

National Wild and Scenic Rivers

National Wild and Scenic Rivers

 Scenic
 Wild
 Recreational



U2256A - Was designated as open in the DSEIS but changed to decommission in the DROD. This is a higher difficulty single track trail that provides technical challenge for advanced skill single track riders. It is an important connector between 2097 and 413 since the actual 2097 route will be terminated before dropping down into the 413 wash.

U2256A connects to U2256 which provides connection to four routes (T571, T273, T 325 & T472). Without U2256 these routes dead-end with no outlet

U2256 connects four single track routes to 413 and to 2097

**U3035 Issue - TRAL
Obj. #19**

— Non-Forest Service Roads
--- Decommissioned/Closed Routes

Surface Ownership Parcels

 Non-FS Land

National Wild and Scenic Rivers

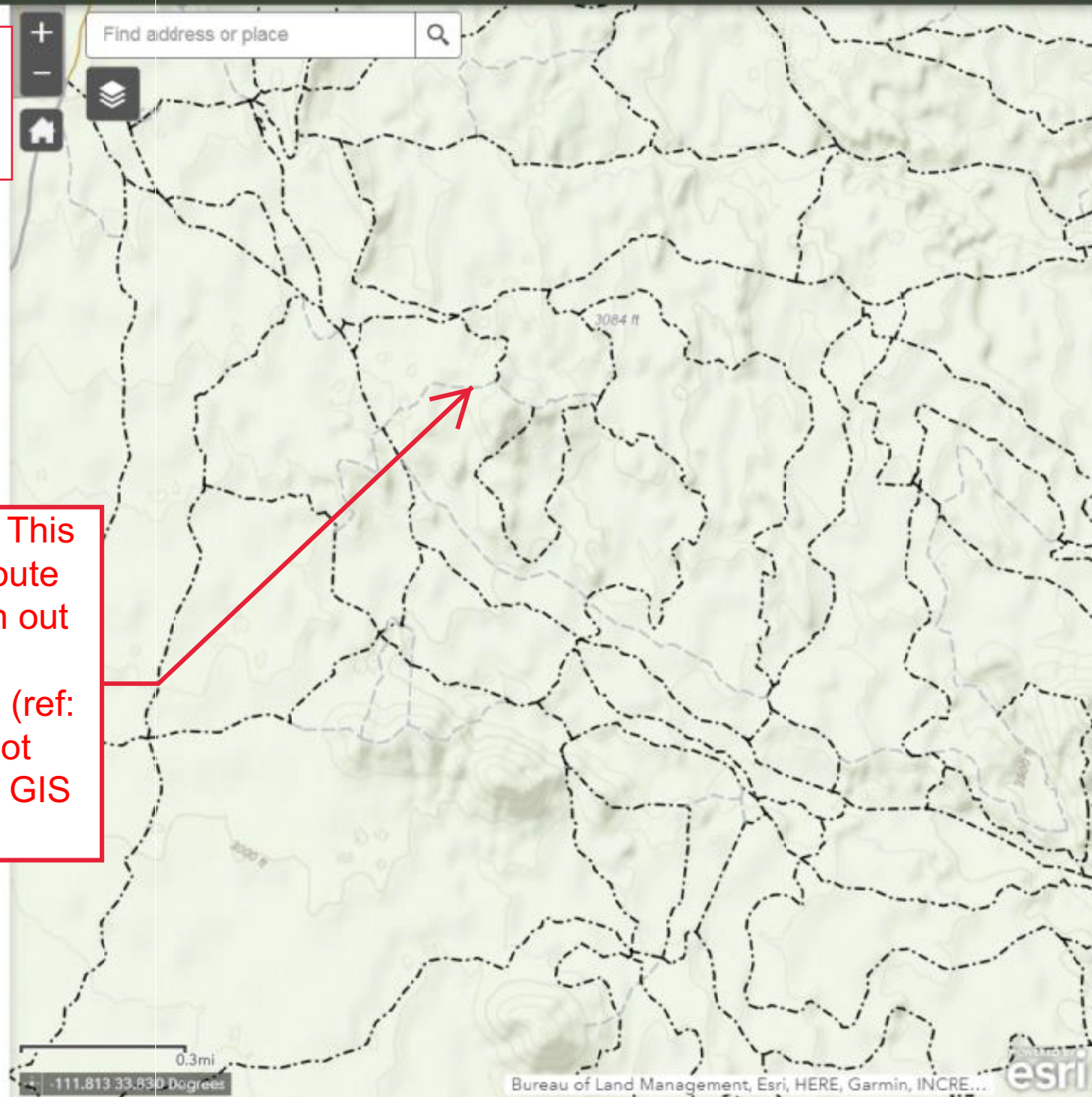
National Wild and Scenic Rivers

 Scenic

 V

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U3035 shows as decom. This designation leaves two route segments "stranded" with out a connection. This was approved as open by DR (ref: TRAL Obj #19) but has not been changed to open in GIS data



U3075 Issue

Administrative Access Only Roads

Non-Forest Service Roads

Decommissioned/Closed Routes

Surface Ownership Parcels

Non-FS Land

National Wild and Scenic Rivers

National Wild and Scenic Rivers

Scenic

Wild

Recreational

FSEIS table 11 shows U3075 changed from decommission to open-single track. The story map does not reflect this change.

Also U3075

0.3mi

-111.811 33.841 Degrees

Bureau of Land Management, Esri, HERE, Garmin, INCRE...

POWERED BY
esri

Route Status

U3090 Issue /
TRAL Obj #5

— Non-Forest Service Roads
- - - Decommissioned/Closed Routes

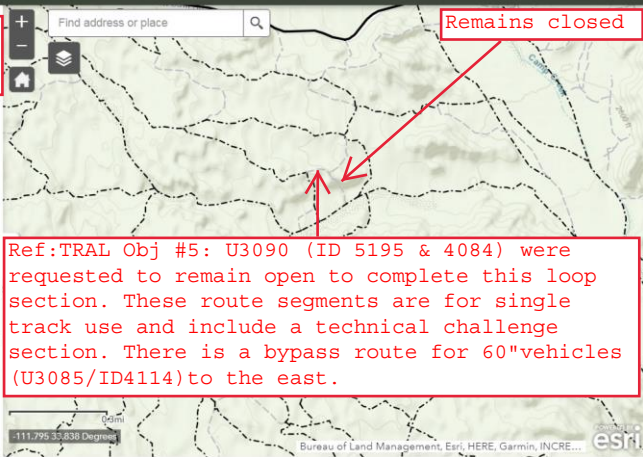
Surface Ownership Parcels

 Non-FS Land

National Wild and Scenic Rivers

National Wild and Scenic Rivers

 Scenic
 Wild
 Recreational



Remains closed