#### Submitted via email

November 17, 2019 rev. 0 Calvin Joyner Regional Forester Tonto National Forest All Units 333 BroadwayAve. SE, Albuquerque, NM, 87102





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# Comments for Tonto National Forest TMP Final Supplemental Environmental Impact Statement #28967

The following are Arizona Off Highway Vehicle Coalition, Arizona Trail Riders comments to the Supplemental Environmental Impact Statement for the Tonto National Forest Travel Management. The above Organization's have provided the Tonto National Forest with substantive comments for multiple previous EA/EIS starting in 2005 and the 2014, 2016 Draft EIS 2018 SEIS and now the 2019 **Tonto National Forest TMP Draft Supplemental Environmental Impact Statement**.

Formal notice of the objection period began Nov 4<sup>th</sup>,2019 with formal objection period ending 45 days later on Nov. 19.2019.

For the purposes of these comments, and in accordance with applicable CFR, The lead Commenter should be identified as Jeffrey Gursh, on behalf of Arizona Off Highway Vehicle Coalition and Arizona Trial Riders. Should Mr. Gursh not be available, Don Hood with Arizona Off Highway Vehicle Coalition will act as our second.

#### **Commenting Organizations:**

**Arizona Off Highway Vehicle Coalition** is a Federally recognized 501c3 Non Profit organization based in Phoenix, dedicated to improving and preserving recreational opportunities in Arizona. Our primary goal is to provide Public education on responsible recreation and develop a State Wide managed trail system that will allow for ALL recreations and at the same time, protect the natural resources for future generations.

AZOHVC has been directly involved as partners with the Tonto National Forest for over 12 years.

**Arizona Trail Riders is a non- profit organization based in Phoenix Arizona**. Our primary goal is to provide Public education for responsible OHV recreation on public lands and work with Land managers to develop sustainable OHV trail systems.

ATR has been directly involved partners with the Tonto National Forest for over 20 years

# <u>Name of proposed project:</u> 2019 Tonto National Forest Final Draft Supplemental Environmental Impact Statement

<u>Names and Title of Responsible Officials:</u> Neil Bosworth Forest Supervisor, Greg Schuster, Calvin Joyner regional Superviser.

Implementation area: Arizona, Tonto National Forest

#### **Reasons for comments**

**1. Designation of route size/type.** Final SEIS continues issue with miss-coded, miss-identified route width and inconsistent or lack of identifying OHV routes by type of use/ width and lack of understanding how your trails are used and by who.

**Resource damage is STILL the big issue**. New OHV trails can damage riparian areas or sensitive habitat. Widening of existing narrow routes by larger vehicles increase foot print, increasing resource damage. Coding must be fixed.

**Reasons to consider:** A 24 inch dirt bike trail maybe an acceptable route thru area where a 10 foot Jeep road will do damage.

Miss-labeling a single track route as a jeep road or a 50 inch ATV route as a jeep road or a 60 inch UTV road as a Jeep road will increase any one of these smaller routes to a 10 to 15 foot wide road. In most cases, these smaller /narrower routes go thru terrain that will not allow the Jeep to go thru on same path. This creates trail braiding that adds to the resource damage. You also show existing Jeep road as now being designated as single track 24 inch dirt bike trails. This allows a dirt bike to connect to true single track that is 24 inches wide but also encourages Jeeps that have always driven on this road to continue to use and eventually try to drive down the 24 inch trails that connect to Jeep road.

#### Please see TRAL comments for the CCRD and Mesa district for details

\*\*\* Possible solutions: Follow inventory and use data shown for type and width of trails to determine what use can be sustained. Fix coding issues.

Note that there are far too many of these coding issues to list in this Final SEIS comment letter. Our general comment and accompanying maps will show more detail.

\*\*\*\*Please note that only the Mesa and Cave Creek districts show any significant or any single track routes, that only the Cave Creek acknowledges that there are routes up to 60 inches wide other than single track and that no other district references a route size other than Full size motorized trail or High clearance vehicles. We know this is not correct from past EA work.

2019 what would be helpful for future TMP/EA/EIS/SEIS work, each type of OHV usually will look for "their" type trail first to make comments. The ability to "turn on" a specific type of OHV trail, say single track, would have been a huge help to commenting on this plan.

2) CCRD T4227, U2248, T4079: Problem: Mis-coded routes, Full size access and exit from single track and admin.

**Reason to consider:**T4227 is designated on the maps as a full size route.

Additionally, T4079 is shown as Full size but is actually Single track on the ground and has always been single track.

T1088 Shows as a Full size route but starts from single track and ends on single track U2244.

Please connect the section of U2244 that would allow T4227 Single track to connect rather than be a dead end trail.......

Keep U2244 from 144 st South to intersection of T4277 as admin access only. Fire suppression and FS access.

These are the kind of problems we have dealt with for more than 20 years of forest service planning.

**Possible solution:** Fix coding , work with TRAL and AZOHVC to understand the Master Plan created with CCRD staff. Make changes to route system to reflect actual use and connectivity.

See Map 1 SEIS screen shot below.

#### 3) CCRD in 2091 area single track U3049, U3043, T1057, U3051,:

**Problem:** Mis-coded routes, wrongly Decommissioned routes

The Decommissioned Single track coded as U3049 and U3043, is critical to the "looped trail system" developed in the CCRD Desert Vista plans(1998) and later incorporated into the CCRD master plan system.

ATR, AZOHVC and TRAL have, for years, shown these "looped" single track runs with directional arrows on our comment maps for 20 years worth of Planning, EA's, EIS and SEIS.

(See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

T1057 designated as Full size, currently ends at a decommissioned Single track (U3049 Should be open Single track) and ends at single track U3051.

**Possible solution:** Please fix the obvious miscoding on these routes and open decommissioned Single track

See Map 2 SEIS screen shot below.

#### <u>4) CCRD in 398/1109 area</u>: T4210,T1371, T4397, T1351, T1614, T2216, T2732, T1898, T1315,

T1406 See Map 3 SEIS screen shot below.

**Problem:** Mis-coded designations of routes.....question motorized west of 1109 this area.

The following routes are actually single track trails:

T4210 (includes segments:T4210,T1371, T4397, T1351, T1614, T2216) is a single track that runs parallel to 1109 full size route. It at one time had a wire fence separating the 2 routes. This route is important in that it allows dirt bikes or mountain bike or horse to run south from 2123 to the 398 are and avoid full size on the narrow 1109 route. Safety All these are coded as full size but exist as Single track on the ground.

Other routes in this area that show as full size that are questioned:

T2002 was single track, T2732, T1898, T1315, T1406.............all these I believe are still single track. Though there have been old jeep roads from rancher in area west of 1109, most have been eliminated with the Planning for this area as equestrian.

See "Map 7 144<sup>th</sup> street 1109 area horse trails" for what area routes on the ground actually look like. The inventory was done for CCRD by AZOHVC in 2014 and has grown with the delays in EIS and SEIS.

Possible solution: Fix coding problems, follow CCRD/TRAL/AZOHVC master plan.

#### 5) CCRD in 144st./2123 area: See Map 4 SEIS screen shot below.

**Problem:** decommissioning and designations of routes...

A New route U2225 full size is shown as new 2124 route. This **is** the alignment for 2124. U2224 has been shown as decommissioned since the 2000 Desert Vista plans.

The U2224 was done, repaired and rebuilt (and signed 2124) under a AZ State Parks grant (571112) By AZOHVC under supervision from CCRD District ranger and staff. 571112 grant.

**2124** is popular with motorized and non motorized users and not unusual to have problems with High Speed motorized users and non motorized users.

**Possible Solution:** Rather than decommissioning the *U2224/2124A*, *Suggest keeping U2224/2124A open for non motorized users*. This will separate the users and make a better safety solution in this area.

#### 6) CCRD 388/404/FR19 area: See Map 5 SEIS screen shot below.

**Problem:** decommissioning of the connector between 388 and 404. *(U2164)* Safety issues:

The 388(60 inch) route runs to FR 19 Bartlett Dam Road. It does have a connector U2201 (60 inch) That allows 388 traffic, if under 60 inch, to loop back to the U2163 (full size Vehicles) route.

The safety issue is that without a connector all the way to the 404 route or at least to the 2063 route entrance to permit zone ......any traffic that want to access these routes or the permit zone, will have to run the FR 19 paved 50 mph, boat and camper hauling traffic road.

Since 2000 Desert Vista, this connector from 388 to the 404 route and the intersection of the 205, was considered an important safety route. Now with the permit zone in the north, there are only 2 ways in from FR 19, one from 205 and 1 from 1058.

**Possible solution:** Please reconsider this important connector (U2164) and open to Full size traffic from U2163 to the 404.

#### 5/9/19 draft SEIS comments: Worth giving a second time:

Connector needed as in CCRD Master plan

On the Cave Creek Ranger district, South Master planning area, the 388 and 404 routes dead end at Bartlett Dam road FR19, a 50 MPH transportation corridor for Lake Boat traffic.

Currently, any OHV traffic that would connect to the 404 from the 388 enter the Bartlett Dam road traffic and turn back on to these two OHV routes. This is a huge safety issue for all traffic and OHV.

**Reason to consider:** The connector that has been in the CCRD OHV plans since Desert Vista in 2000, allows OHV traffic to stay off of Bartlett dam road and connect these two popular routes in a safe manner.

Additionally, the connector allows all north bound OHV traffic to use the FR 404/Bartlett dam Rd existing traffic control area to safely cross and continue north into the St Claire Peak trails and on to Horseshoe dam routes. (excellent line of sight for all traffic)

**Possible solutions:** Include routes in Final ROD, include in GIS. Recommend this segment from FR 388 to the FR 404 be designated as Full size Motorized trail to match the FR 388 designation and allow all OHV traffic access to the FR 404/Bartlett dam road intersection for safe north bound travel. Note that this route was included in Grant 551202, but Arch surveys were inadequate to allow construction at that time.

#### 7) CCRD Saint Claire peak Permit zone 1117: See Map 6 SEIS screen shot below.

Problem: 1117 missing section back to 532 staging area

Missing /Closed route 1117 and 2034: Thank you for fixing the DROD issues as to open or closed.

Open ALL of the built/repaired 1117 that is part of CCRD master plan for a family trail area that is part of a multiphase Plan for OHV use. Keep open as approved in Grant 571111.

Reason to consider: 1117 and 2034 are part of a 2013 grant to rebuild a large portion of RATM routes in the closed fire area in preparation of opening the area for public as a permit zone. This route loop(loop is not shown SEIS map) is the easy, close in family ride from the proposed and approved State Parks new grant to build a staging area in the Indian springs wash area. State parks OHV grant monies were used to rebuild the majority of RATM routes in this area. This is the 2<sup>nd</sup> time these routes have been left off of plan. There rebuild was approved in 2011 when grant and SHPO docs were completed and awarded. **Possible solutions:** Include in plan as has been in works for 6 years. KEEP OPEN, show on SEIS map as

approved on the ground. Note TRAL and master plan both show this as a loop trail.

\*\*\*Please note that the section of 1117 from FR 19 to intersection of 1117 going west to 532, is admin access only from Gate at FR 19. This is for Access for Fire Suppression and SAR. 1117 is signed at intersection turn west, showing locked gate ahead and admin only access.

#### 8) CCRD Camp Creek wash 513 permit zone : See Map 7 SEIS screen shot below.

**Problem:** 2060 mis-coded and 2063 permit zone access point

2060 route was part of the big ASP grant 571111 to repair the RATM routes in the Bart Fire area in preparation for the TMP and development of the CCRD OHV master plan.

Though SxS were just coming into popularity, the 2060 was originally looked at as a narrow Jeep route and smaller OHV ATV, MC. Whe project actually started, the 2060 was built for 60 inch to Jeep size OHV. Narrow washeds at the south west end would be difficlut for full size OHV.

Mis coded again.....shows as single track.

**Possible solution:** Keep open to minimum 60 inch OHV or Jeep size OHV.

Built, Signed and approved by CCRD/TNF SO staff as a Jeep size route. AZOHVC grant 571111.

NOTE: shown as a route access point to the Permit zone north of FR 19, there was to be an access point /gate in Camp Creek Wash and 1058 east and west points. These would be locked gates with a code gotten from Ranger station for access. 2063 is now shown going to FR 19. Is this another access point and gate? It was determined by FS LEO that poor line of site would be an issue for the 2063 access point.

#### 9) Mesa 393 connector to 627 : See Map 8 SEIS screen shot below.

Log Corral Road and Powerline 393 road Mesa District: Thank you for Changing Log Corral Road back to Full size from Single track.

**Problem: Dead end at Wilderness** 

Please consider opening Power line road from north all the way thru to Log Corral road.

**Reason to consider**: Log Corral road is just that, a road. Is access for rancher and 4x4. Important 4x4 connector and access for FS admin access to RIVER SIDE. Also access to Power Line road.

Power line road is great long distance trail from pavement to pavement. Access for APS for line inspection and repairs.

Great 4x4 and OHV route. It is shown closed at north end near wilderness. And open again to Pavement. APS can only access from north.

WAS shown open in DROD but each end is blocked to other than Single track or closed. Blocks access to now open from the south but still a dead end at wilderness area..

**Possible solutions:** Open north end of power line road to allow access to wilderness trails (possible trail head) and connect 393 to section of 393 that connects to 627.

Even if you may not build the connector for years, please consider noting that you want to connect this route in the future.

#### 10) Mesa NF 627 and Baseline Hwy: See Map 9 SEIS screen shot below.

**Problem:** Not as familiar with the Mesa district as should be. TRAL is our partner in Mesa. With all the other mis-coded and errors on designating routes.....just question that there is an administrative only closure between these 2 routes.

North Baseline Hwy is shown open to passenger cars in the south from SR87 and NF 627 is shown open to Passenger cars coming in from the North. AZ87 is shown closed to public use as Admin only. Is this correct? Would be nice to be able to drive in from south to access trails.

#### 11) TNF north Strawberry area : See Map 10 SEIS screen shot below.

Problem: FR 708 administrative Access only sections.

The routes in the Fossil creek area have been open in TMP plans from 2006 thru 2009, 2012,2014. We have worked with the Strawberry Fire department on the issues of safety and access on both the 708 and the upper creek trail.

The 708 is a connector between the Coconino and TNF and was utilized by locals and public users to make long distance and Coconino access.

The 708 is also a utilities corridor and has in the last year had vital fiber optic lines damaged from flooding on the 708. Access to make repairs is crucial.

Recently the Strawberry Fire Chief Gary Morris met with Niel Bosworth, and state representatives and Sen. McSally on the 708 issue. Please see the most recent developments in managing the 708 route.

Our issue is the same as other areas of mis-coding and "how do you access that road" problems.

SEIS maps shows admin. From Upper Springs parking area to the section in the wild and scenic corridor that shows open to full size. We assume that the 708 route on the Coconino is open to full size but SEIS maps give no information on what is going on in the Coconino side.

This is typical everywhere you connect to another forest or BLM or ASLD lands. Would be helpful for commenters to know if the other side is open to OHV or closed ......this would make a difference in how we commented!!!

PLEASE contact Strawberry Fire Chief Gary Morris at 602-803-7366, Email at <gmorris@psfd.az.gov>

#### 12) TNF far East section Cherry Creek: See Map 11 SEIS screen shot below.

**Problem:** 203B decommissioning

**Cherry Creek Road.** Object to closure of road.\*\*\* Reopen.

Sierra Ancha Wilderness boundary road 203B. This road has been open for more than 20 years to motorized access and was shown open in the Draft EIS as a High Clearance vehicles ML2 road.

AZOHVC nor our other organization partners made comment on this route because you showed open in your preferred alternative. Your Draft ROD now shows it as a closed route to Motorized.

**Reasons to consider:** This is an important route to all that use this area. Access to Wilderness trails for hikers and horseback riders need this route to get close enough to trail heads to make day rides. OHV use this route to view the beauty of the wilderness that they cannot access by OHV.

NOTE: not everyone can hike or have horses to access these area, OHV also give public that have limited mobility the opportunity to visit the edges of these Beautiful wilderness areas. Though the site seeing is limited from fringes of wilderness areas such as this, this route still offers OHV a taste of the wilderness beauty and a respect for preserved public land. *This was the only road to Young in the past*.

\*\*\*Possible solution: Keep route open until a request to Congress can be presented to grandfather this route in as a motorized access corridor or changes to the Boundary to allow the whole road open and outside of wilderness boundary can be presented. See jeep 401 road in Four Peaks Wilderness as example.

#### 13) TNF Payson area 1194: See Map 12 SEIS screen shot below.

**Problem:** Shown as a Full Size route, 1194 has been a single track trail as noted by Arizona Trail Riders comments to EA and EIS, since 2009. Please keep as single track.

**Reason**: Other that the CCRD and Mesa districts, there is little to no single track on the other TNF districts.

**Possible Solution:** Keep as single track. Please note that since the 2009 EA comments that this was single track, west end has become UTV size from NON FOREST PARCEL.

\*\*\*NOTE: issue with figuring out where you are and referencing locations in comments and where your favorite trail is located. Would be helpful if rather than tell me that this is a NON FOREST OWNED PARCEL.......you told me what it was, town city, ranch???? It is hard enough to figure out

#### 14) TNF Mesa 3456 and 160 single track area: See Map 13 SEIS screen shot below.

**Problem:** P6012 and P4048A and 1096 routes are decommissioned.

The "Dagger "trail (P6012) has been open in the last 3 EA/EIS/SEIS cycles.

Over the years, this route has been a work project for both TRAL and ATR clubs for single track maintenance and up keep. Since TRAL started working on the Mesa District, this and the south route noted (P4048A and 1096) have been considered part of the Mesa Single track system.

The south single track noted is also shown as decommissioned. Both of these routes are important in that there is very little single track left on the TNF and Mesa And CCRD are the places that have single track.

**Reason:** The Dagger trail starts on the 3456 route (full size) and runs north and east to the 1333(Full size) With the 1333(Full Size) dead ending, connecting the P6012 (Single track) trail allows a great flowing single track thru beautiful, changing terrain, to connect and make a great loop trail back to log corral road.

The second South route is made up of P4048A (Starts in north from 160B) and connects to 1096C which connects to the 1852 (full size route. P4049 and 1096 D would be decommissioned as commented in past EA, EIS, and SEIS. This route has a great diversity of terrain and views not found together elsewhere in the MESA district for single track.

**Possible solution:** Please consider keeping these 2 special trails open.

### 15) TNF CCRD Full size and decommissioned routes in the 2091 area: See Map 14 SEIS screen shot below.

**Problem:** The decommissioned routes U3035 (we will call them section A1 And A2) have been part of one of the most popular loops for single track in this area of CCRD single track. (See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

This route is part of the Master plan for CCRD. Please note Dead ends don't work! The south section of U3035 from intersection of U3027 and running to the 2091 in the north is a tough A ride that is an alternative to the easy U3035 to MT513. Challenging sections like this Allow more advanced rider a chance to test themselves on tougher trails and less experience riders to still have the easier route back to the 2091 as a loop.

The continuation of the U3035 north of the 2091 is a Mid level difficulty trail and is also access to Trials bike areas that have popped up since 2015. Very popular with the trials bikes these routes are not accessible without this route and the popular loop that U3035 is a big part of is not possible without this section.

#### multiple issues with miscoded routes also are in this area.

T4417 is shown/designated as a Full Size route......it is accessed from U3052(less than 60") and either dead ends at a decom. U3035 or a Open U3035 Single track.

T149 designated full size route, starts on PST011(single track) and either dead ends at a Decom U3035 single track or a open U3035 open single track.

Either way, you cant have a full size route accessed from a small designated route from both ends.

Possible Solution: Please fix coding. Follow the CCRD master plan and look at attached Map 5, "2014 Wildcat staging area\_Desert Vista single track" that shows the way system is used.

### 16) TNF CCRD Full size and decommissioned routes in the 2091 area: See Map 15 SEIS screen shot below.

**Problem:** T752 is show as a dead end 4x4/Full size that is accessed from a Single track trail (PST015). U2326 decom should finish Loop PST015 to U3051 AS single track.

T1057 is full size accessed only from Single track and dead ends.

**Reason:** It is not a full size route (T752). U2326 is a single track and part of the Master plan trail system.

**Possible solution:** fix mis-code route T752 to show single track. Keep open U2326 as single track connected to U3051 in south end and to T752 in the north to complete the loop. (See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

#### **Additional comments:**

## <u>CCRD Routes repaired in Grants, existing routes, past EIS/ TMP misscoded since 2011 not reflected in GIS map:</u> Miss labeled, miss coded or closed routes.

Hundreds of hours of time have been spent by AZOHVC, ATR and TRAL commenting on the CCRD master plan and past TMP/EA/EIS/SEIS plans. We have given data on existing routes , new routes RATM routes and how routes are used . We have comment on each route for type of OHV use , how each section is part of a system of routes and why closing one section affects all other sections as reasons to keep open.

The time it takes to go Evaluate section by section is tedious and time consuming. Some of us have been commenting on the same routes since 2000. There are still dozens of miss coded routes on the GIS maps and quite honestly, there simply is not enough time to review every single segment in 5000 miles of GIS map to catch them all.

We appreciate the efforts to work with the public and know this is a daunting task for the Forest as well as those of us that have to comment.

Also, On the Cave Creek Ranger district, CCRD and AZOHVC have partnered on OHV and recreation projects for almost 20 years. The latest grants have been route maintenance work on existing RATM routes in both the north St. Claire Peak area and the Desert Vista areas. These projects started in 2011 and ended in early 2016. The prep work for the master plan has been going on since 1999 with Delvin Lopez.

**Reason to consider:** These routes are the first phases of projects that were developed in the new partnership between AZOHVC, TRAL and CCRD, to have a master plan trail system for responsible managed OHV recreation on the CCRD. Each phase repaired routes that were the base route system for each area on the CCRD. Each phase allowed additional future grants to continue the development. The next phase is parking and staging areas. Without the work done in these grants included in the SEIS inventory as they were built and designated, future grants will be affected.

**NOTE:** These grant projects were funded by State Parks OHV funds using both OHV Decal and RTP funds. Worst case scenario, In most cases, closing or changing the use of infrastructure, or routes and materials from these grants requires the return of the funds.......

**Possible solutions:** We ask that the ALL the routes, as approved by TNF CCRD District Ranger Louise Congdon and acting District Ranger Jason Scow, be included in the SEIS inventory "as built" and designated.

### **SEIS Comment Period not long enough for meaningful whole forest comments:** Extend comment period. 45 days may seem like a long time to comment

Issues: this is the largest forest in Arizona. It has some of , if not the most popular, OHV trails in the state.

Huge numbers of users not only visit District trails close to their home but visit All Districts trails. This means that those users should have the time to comment on the Whole Tonto National forest Plan. It has taken almost 1 year for the forest to complete the Final SEIS and present to the public for comment. Yet you are giving the public only 45 days to comment on the entire Forest Plan.

To make matters worse, you have chosen to make changes to the SEIS that were not on the Draft SEIS ROD

#### Example:

For the last 3 weeks, AZOHVC and ATR have left messages and or called and got no answer at the Tonto State Office. We we retrying to get additional information on the Final SEIS, a PDF version of the route map......as we did last year for the Draft SEIS 5/9/19 comment period.

No left messages request information were returned and we were never able to get the State Office to answer the phone..

*Example:* We still had to go segment by segment on the entire CCRD to find error and changes to how the route use coding was in error. All this takes TIME.

Most if not all of us work that are commenting.....NOT on a favorite, but a whole district or the whole forest. The current GIS web map is great for a favorite trail or to find a existing road, but very difficult to find the social single track they ride that has no number, especially when that route maybe made of 6 or more segments.

*Example:* Finding the coding errors means going back 3 TMP cycles ago to compare type of route to type now shown. In some cases we had to re-read the whole EA/EIS/DROD to find what had changed..

Most of us that bother to comment are now trying to refer to what we showed on DEIS maps and FS EA maps all the way back to 2009 and are now going line by line to match up and compare each line as what it is now versus what was shown on SEIS.

Reason to consider: After 18 years of public comments, the public sees commenting on Forest plans as a waste of their time...... which defeats the purpose of the public comment section of NEPA. This skews any data that you do get. DON'T alienate the public.

The NEPA process was meant to get meaningful comments, not comments from last man standing. Additional problems occur as knowledgeable Forest Service employees that worked on the original plans 18 years ago....retire and Forest service does not allow those retiring employees to train their replacements......This creates a disconnect with the past plans and no ties to your existing partners with new employees ....in many cases, the new employee has no Plan history of why routes were open or closed or who Forest partner organization helping with project and planning are.

- \*\*\*Possible solutions: \* Extend the comment period at minimum 30 days. This is what was done for the 2014 Draft EIS. There simply is not enough time to review all the changes and data in this plan.
- \*Remember the public works for a living. They cant and wont spend dozens of hours looking at maps that don't even have the existing FS trail numbers listed on the trails to find there favorite trail
- \*Organize the SEIS format so public can easily compare draft EIS to Draft ROD. Map data should match all the way thru process.
- \*List at minimum, the existing trail numbers that can be found on trails in the field on the maps.
- \*have a plan for OHV, not just a bunch of trails. Look at proposed master plan TRAL and AZOHVC have been working on with CCRD staff.

) No cohesive OHV plan in SEIS: you need a Master Plan. OHV routes are only existing routes on ground. There is no TRAIL system for public to understand.

Note: Without some type of master plan for the SEIS, you are not asking the public to comment on a travel management plan, you are asking the public to create a travel management plan for you. Your current "plan" lumps all users trails together, does not even hint at parking, staging, camping or

system connectors between districts or even from one section of a district to another. Or other land owners such as BLM or ASLD.

\*Without a Master plan...... you can designate the routes to be open, but have not planned where staging or parking areas are needed. With a flexible cohesive plan that follows year after year despite changes in Forest staff, long range plans for trail repairs, future mitigation for PM 10 dust issues or expanding urban interface or more public users can be addressed......

**Example:** you planned your trail system and close routes as needed today. You were not allowed to designate parking and staging areas because they were not considered trails IN the DROD. Now you want to do staging and parking areas......but the areas you want don't have roads to them .......

**Example:** connectivity to other districts or other land agency lands. No plan may mean that you did not look at adjacent land owner for allowing traffic from both agency's trails to connect......reducing traffic on both trail systems. From the CCRD to the Mesa district.....FR 160, in past was a popular connect to visit both forests trail systems......now seasonally closed.......limited connection to Mesa in SEIS. Note you did change from closed to seasonal thank you.

**Possible solutions:** Look at work being done with the CCRD and TRAL/AZOHVC master plan draft. This plan has allowed plans to develop OHV recreation in phases that rebuild the trails, identify the need and locations of staging areas and future use areas. Plan for uses that need to have a specific area to be sustainably allowed......(rock crawlers and trials bikes) as well as identify location that OHV use should not be allowed.

These Master plans help get both Forest service staff and public involved and give the public a sense of ownership and stewardship in the lands that they will play on.

Note master plans have to be coordinated with Forest Supervisor staff to keep forest wide plan coordination between districts working and an overall forest wide vision of OHV recreation use.

Please note the amount of comments on the CCRD are (master plan in place) versus the rest of the tonto forest districts.

There is not enough Single Track Trail on this Forest: Lack of any single track outside of CCRD and Mesa Districts. Public and Forest know it exists on other districts but not designated in DROD as such. Reason to consider: Single track is a very popular OHV use. Dirt bikes have been around since the 60's and are still very popular. Small foot print when managed responsibly. Routes shared with Mountain bikers and horse and hike recreation. See BLM and Prescott FS for examples. Giving any user group routes they enjoy will keep them on designated routes.......if they are already in the system, keep the routes.

**Possible solutions:** Single track does not have to be continuous, can be sections connected by jeep roads or small OHV trails. Consider keeping existing inventoried and suggested connectors on both the CCRD and Mesa districts. Consider designating the existing Single track in other districts currently lumped in with full size OHV routes. Create long distance connector s for Single track between FS districts and adjoining BLM areas.

AZOHVC and its members would like to thank Steve Speak and the TRAL organization for their work and their partnership in developing the Draft Master Plan for the CCRD OHV trail system and these comments.

We would also like to thank Neil Bosworth, Forest Supervisor and former District Ranger Louise Congdon and the Tonto Forest Service staff for all the time and effort put into this undertaking.

We understand that not all our comments are directly considered part of the objections to Final SEIS ROD.

We ask that you consider the merit of the comments and how they affect the SEIS and the DROD and ask that you include these issues/solutions, in the final plan

Sincerely Jeff Gursh and Don Hood Arizona Off Highway Vehicle Coalition and Arizona Trail Riders

# These comments are submitted by the following individuals; on behave of their respective organizations:

Don Hood President Arizona Off Highway Vehicle Coalition 5402 East Grovers Ave Scottsdale AZ 85254 602-692-9382 The1phxman@gmail.com



Jeff Gursh
Executive director
Arizona Off Highway Vehicle Coalition
5402 East Grovers Ave
Scottsdale AZ 85254
602-290-6449



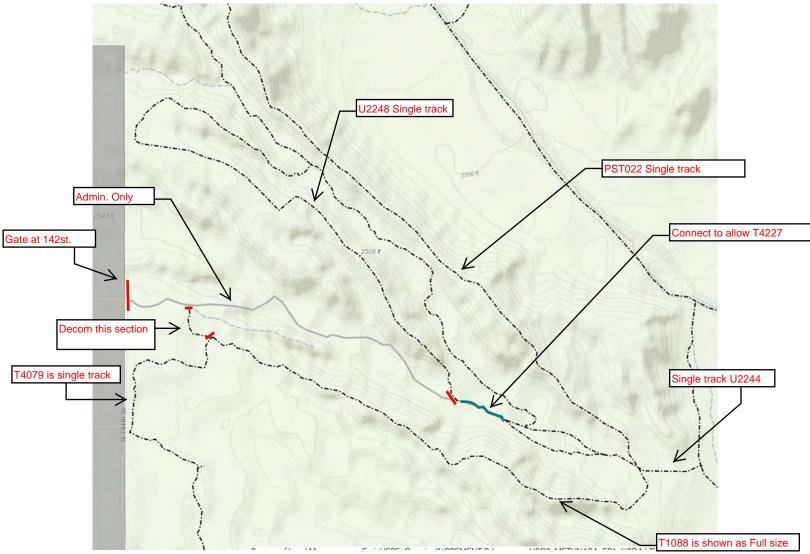
tablemesaranger@gmail.com

Jeff Gursh Land access officer

Arizona Trail Riders PO box 31877 Phoenix AZ 85046 602-692-9382

Tablemesaranger@gmail.com





Mis-Coded routes CCRD.

T4227 is designated on the maps as a full size route.

This route starts on U2248 Single track route and ends At U2244 Admin access only route. HOW does a full size get in ??

Cant use single track and cant use Admin.

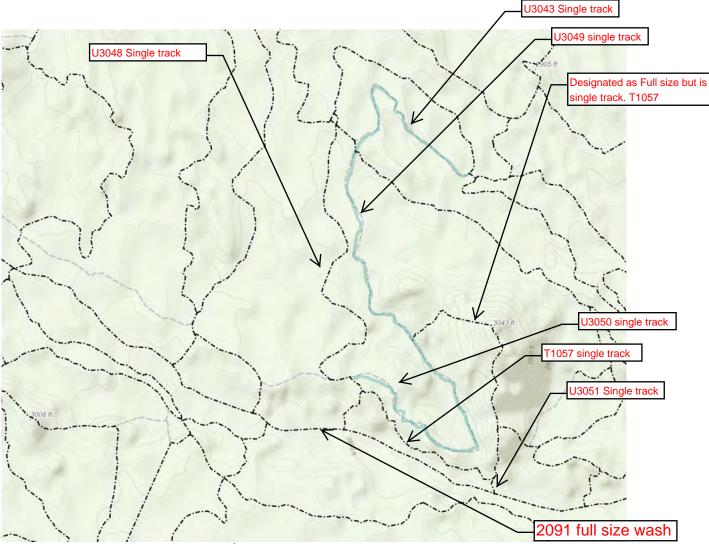
Additionally, T4079 is shown as Full size but is actually Single track on the ground and has always been single track.

T1088 Shows as a Full size route but starts from single track and ends on single track U2244.

Please connect the section of U2244 that would allow T4227 Single track to connect rather than be a dead end trail........

Keep U2244 from 144 st South to intersection of T4277 as admin access only. Fire suppression and FS access.

These are the kind of problems we have dealt with for more than 20 years of forest service planning.



CCRD single track off of 2091 near 136<sup>th</sup> street entrance 2097.

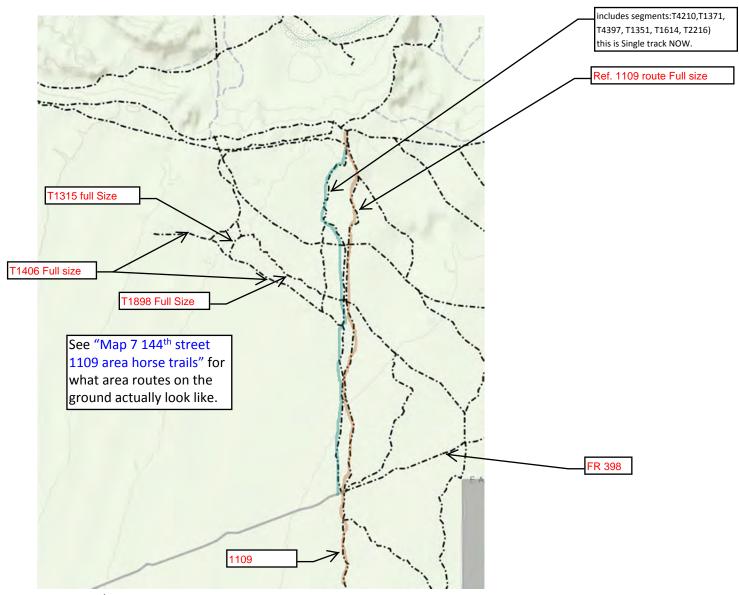
The Decommissioned Single track coded as U3049 and U3043, is critical to the "looped trail system" developed in the CCRD Desert Vista plans(1998) and later incorporated into the CCRD master plan system.

ATR, AZOHVC and TRAL have , for years, shown these "looped" single track runs with directional arrows on our comment maps for 20 years worth of Planning, EA's , EIS and SEIS.

(See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

T1057 designated as Full size, currently ends at a decommissioned Single track (U3049 Should be open Single track) and ends at single track U3051. Please fix the obvious miscoding on this route.

Why would you EVER end a trail at a closed route with no way out? It goes against everything your Rec planners, Trails unlimited teachings and NOHVCC hand books......



CCRD 398 /1109 area

Mis-coded designations of routes.....question motorized west of 1109 this area.

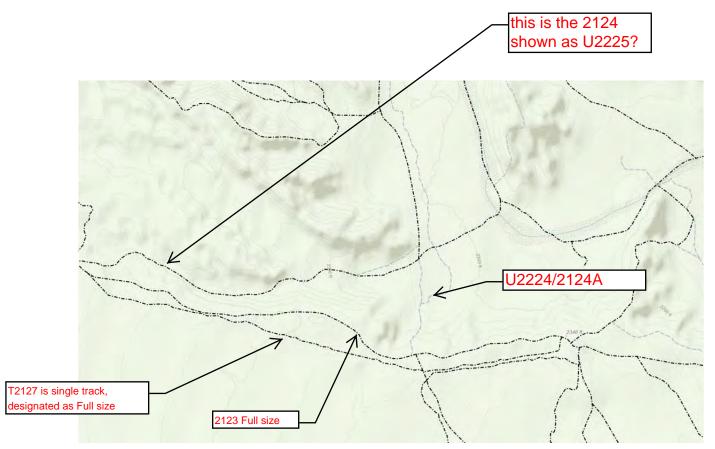
The following routes are actually single track trails:

T4210 (includes segments:T4210,T1371, T4397, T1351, T1614, T2216) is a single track that runs parallel to 1109 full size route. It at one time had a wire fence separating the 2 routes. This route is important in that it allows dirt bikes or mountain bike or horse to run south from 2123 to the 398 are and avoid full size on the narrow 1109 route. Safety All these are coded as full size but exist as Single track on the ground.

Other routes in this area that show as full size that are questioned:

T2002 was single track, T2732, T1898, T1315, T1406......all these I believe are still single track. Though there have been old jeep roads from rancher in area west of 1109, most have been eliminated with the Planning for this area as equestrian.

See "Map 7 144<sup>th</sup> street 1109 area horse trails" for what area routes on the ground actually look like. The inventory was done for CCRD by AZOHVC in 2014 and has grown with the delays in EIS and SEIS.



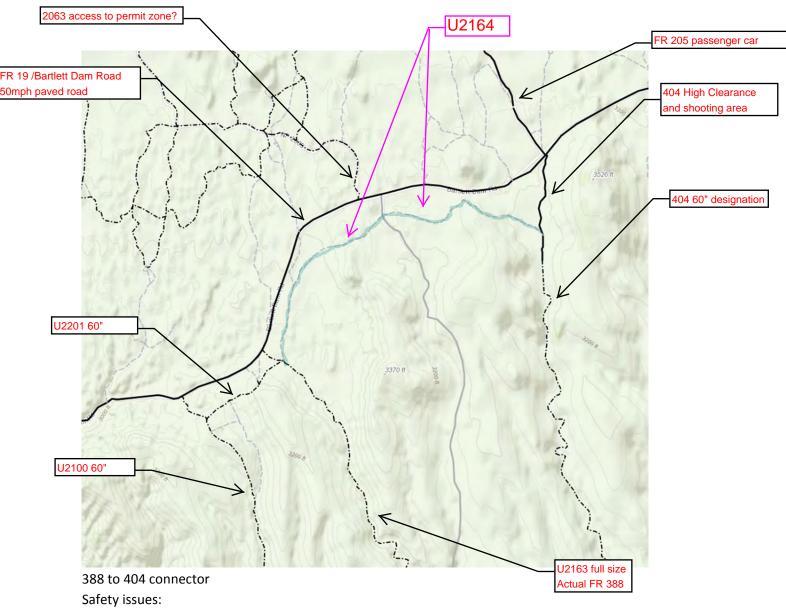
144st area CCRD 2124 route and new access point?

A New route U2225 full size is shown as 2124 route. This is the alignment for 2124. U2224 has been shown as decommissioned since the 2000 Desert Vista plans.

The U2224 was done, repaired and rebuilt under a AZ State Parks grant (571112) By AZOHVC under supervision from CCRD District ranger and staff. 571112 grant.

2124 is popular with motorized and non motorized users and not unusual to have problems with High Speed motorized users and non motorized users.

Suggest keeping U2224/2124A open for non motorized users.

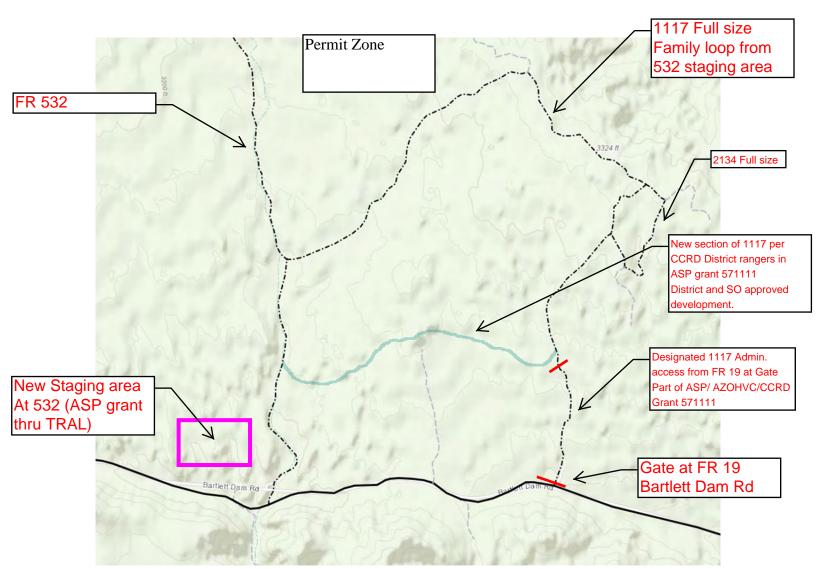


The 388(60 inch) route runs to FR 19 Bartlett Dam Road. It does have a connector U2201 (60 inch) That allows 388 traffic, if under 60 inch, to loop back to the U2163 (full size Vehicles) route.

The safety issue is that without a connector all the way to the 404 route or at least to the 2063 route entrance to permit zone ......any traffic that want to access these routes or the permit zone, will have to run the FR 19 paved 50 mph, boat and camper hauling traffic road.

Since 2000 Desert Vista, this connector from 388 to the 404 route and the intersection of the 205, was considered an important safety route. Now with the permit zone in the north, there are only 2 ways in from FR 19, one from 205 and 1 from 1058.

Please reconsider this important connector (U2164) and open to Full size traffic from U2163 to the 404.



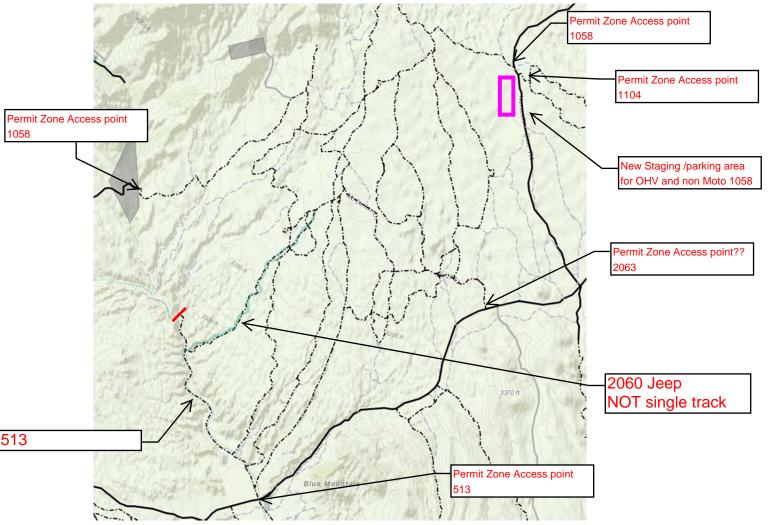
1117 missing section back to 532 staging area family loop 2014 ASP grant project approved and surveyed by CCRD staff, work approved by District ranger and SO. Part of ASP Grant 571111.

**Missing /Closed route 1117 and 2034:** CCRD, these RATM routes are open and part of a family trail area that is part of a multiphase Plan for OHV use. Keep open as approved in Grant 571111. **Reason to consider:** 1117 and 2034 are part of a 2013 grant to rebuild a large portion of RATM route

**Reason to consider:** 1117 and 2034 are part of a 2013 grant to rebuild a large portion of RATM routes in the closed fire area in preparation of opening the area for public as a permit zone. This route loop(loop is not shown SEIS map) is the easy, close in family ride from the proposed and approved State Parks new grant to build a staging area in the Indian springs wash area. State parks OHV grant monies were used to rebuild the majority of RATM routes in this area. This is the 2<sup>nd</sup> time these routes have been left off of plan. There rebuild was approved in 2011 when grant and SHPO docs were completed and awarded. **Possible solutions:** Include in plan as has been in works for 6 years. KEEP OPEN, show on SEIS map as approved the ground. Note TRAL and master plan both show this as a loop trail.

\*\*\*Please note that the section of 1117 from FR 19 to intersection of 1117 going west to 532, is admin access only from Gate at FR 19. This is for Access for Fire Suppression and SAR. 1117 is signed at intersection turn west, showing locked gate ahead and admin only access.

Please see "TNF azohvc-south CCRD pdf" for details on grants 571111 and 571112 projects and routes below.



CCRD North of FR 19 Camp Creek wash 2060 Single track issue

2060 route was part of the big ASP grant 571111 to repair the RATM routes in the Bart Fire area in preperation for the TMP and development of the CCRD OHV master plan.

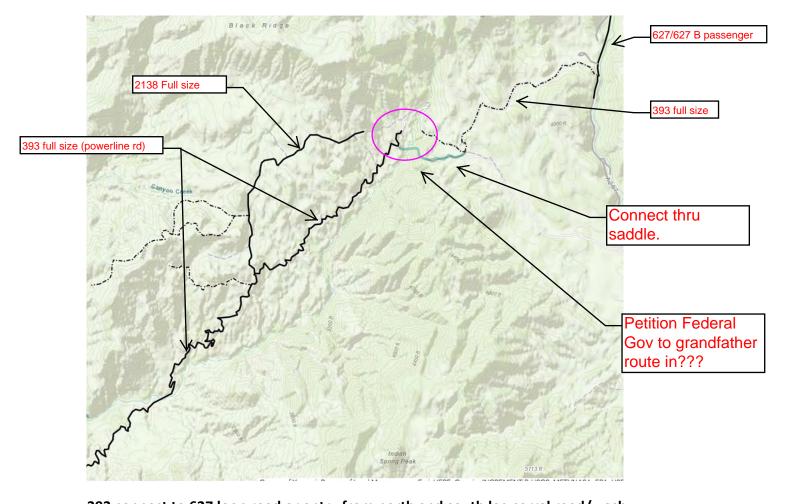
Though SxS were just coming into popularity, the 2060 was originally looked at as a narrow Jeep route and smaller OHV ATV, MC. Whe nproject actually started, the 2060 was built for 60 inch to Jeep size OHV. Narrow washeds at the south west end would be difficlut for full size OHV.

Mis coded again.....shows as single track.

Keep open to minimum 60 inch OHV or Jeep size OHV.

Built, Signed and approved by CCRD/TNF SO staff as a Jeep size route. AZOHVC grant 571111.

NOTE: shown as a route access point to the Permit zone north of FR 19, there was to be an access point /gate in Camp Creek Wash and1058 east and west points. These would be locked gates with a code gotten from Ranger station for access. 2063 is now shown going to FR 19. Is this another access point and gate? It was determined by FS LEO that poor line of site would be an issue for the 2063 access point.



393 connect to 627 loop road or entry from north and south log corral road/wash

**Log Corral Road and Powerline 393 road Mesa District:** Thank you for Changing Log Corral Road back to Full size from Single track.

Please consider opening Power line road from north all the way thru to Log Corral road.

**Reason to consider**: Log Corral road is just that, a road. Is access for rancher and 4x4. Important 4x4 connector and access for FS admin access to RIVER SIDE. Also access to Power Line road.

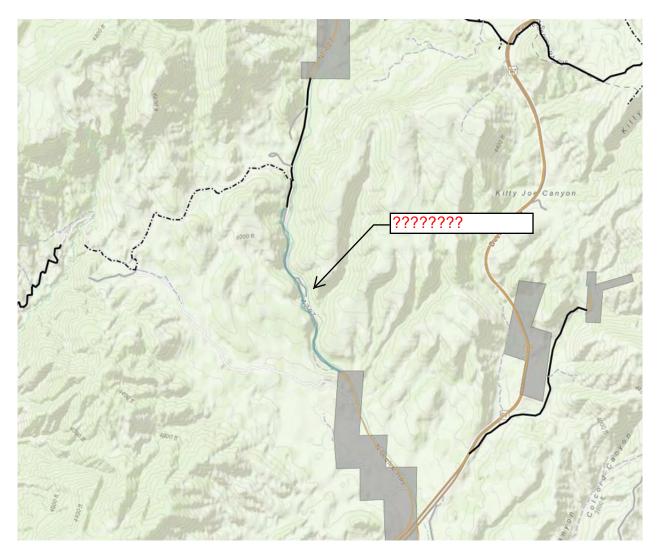
Power line road is great long distance trail from pavement to pavement. Access for APS for line inspection and repairs.

Great 4x4 and OHV route. It is shown closed at north end near wilderness. And open again to Pavement. APS can only access from north.

WAS shown open in DROD but each end is blocked to other than Single track or closed. Blocks access to now open from the south but still a dead end at wilderness area..

**Possible solutions:** Open north end of power line road to allow access to wilderness trails (possible trail head) and connect 393 to section of 393 that connects to 627.

Even if you may not build the connector for years, please consider noting that you want to connect this route in the future.

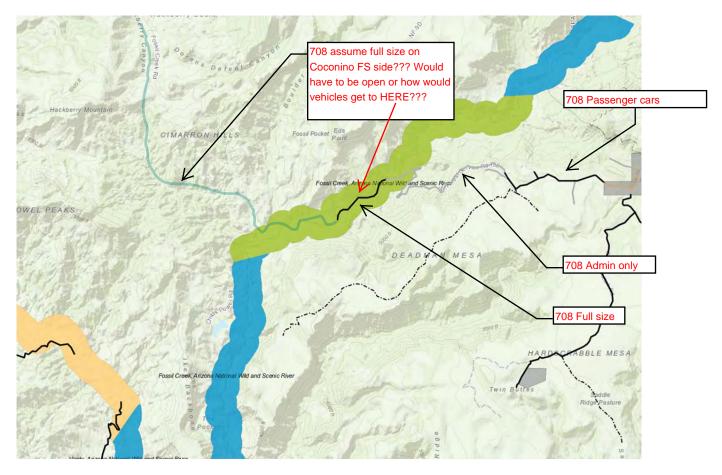


Admin only access ?? NF 627 and N baseline hwy?

Not Familiar with this area but question the Admin closure after all the other miscoded routes.

North Baseline Hwy is shown as open to passenger cars in the south, NF 627 is shown as open to passenger cars in the north and AZ87 is shown close to all but Admin. IS that correct???

Would be nice to keep open to allow access from sout h to



#### Fossil Creek 708 road

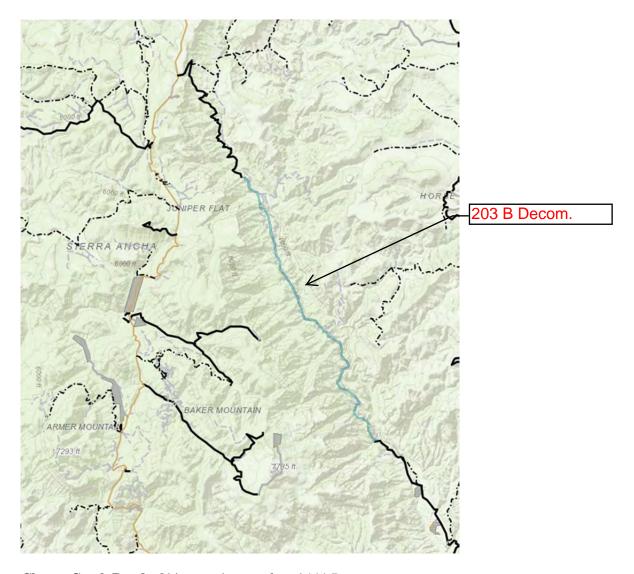
Fossil creek 708 is a major connector from the Strawberry area and has important Fiber optic lines and utilities that at time (flooding) can be exposed in the flooding. These lines must be protected and have access to work on them.

Additionally, Strawberry FD rescues in the Fossil creek area are made more difficult and time consuming with the closure of the 708. (Recently, After multiple meetings with TNF staff and Sen. McSally and other state representatives......the 708 was repaired).

Issue: SEIS maps show the 708 closed from upper springs trail head (admin only) Open in the Wild and scenic area and no information on the Coconino FS side.....assume it is open to the wild and scenic OPEN TO FULL size section from Coconino side.

Please see attached fossil creek data from Chief Morris Strawberry FD.

Please talk to Neil Bosworth FS Super. on latest meetings and decisions on fossil Creek.



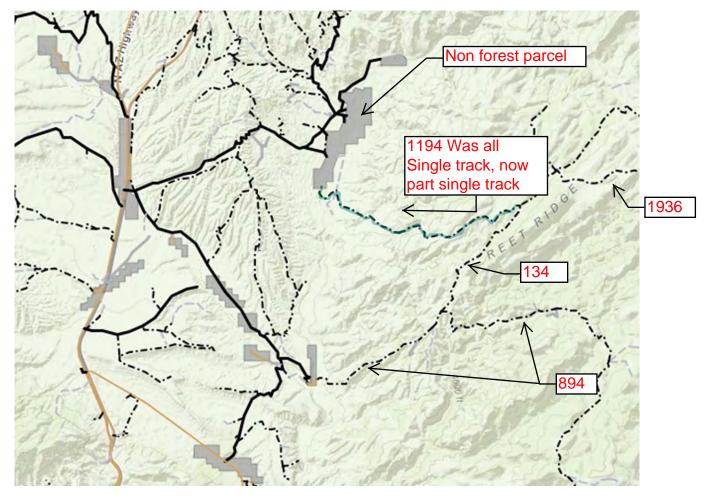
Cherry Creek Road. Object to closure of road.\*\*\* Reopen.

Sierra Ancha Wilderness boundary road 203B. This road has been open for more than 20 years to motorized access and was shown open in the Draft EIS as a High Clearance vehicles ML2 road. AZOHVC nor our other organization partners made comment on this route because you showed open in your preferred alternative. Your Draft SEIS ROD now shows it as a closed route to Motorized.

**Reasons to consider:** This is an important route to all that use this area. Access to Wilderness trails for hikers and horseback riders need this route to get close enough to trail heads to make day rides. OHV use this route to view the beauty of the wilderness that they cannot access by OHV.

NOTE: not everyone can hike or have horses to access these area, OHV also give public that have limited mobility the opportunity to visit the edges of these Beautiful wilderness areas. Though the site seeing is limited from fringes of wilderness areas such as this, this route still offers OHV a taste of the wilderness beauty and a respect for preserved public land. *This was the only road to Young in the past.* 

\*\*\*Possible solution: Keep route open until a request to Congress can be presented to grandfather this route in as a motorized access corridor or changes to the Boundary to allow the whole road open and outside of wilderness boundary can be presented. See jeep 401 road in Four Peaks Wilderness as example.



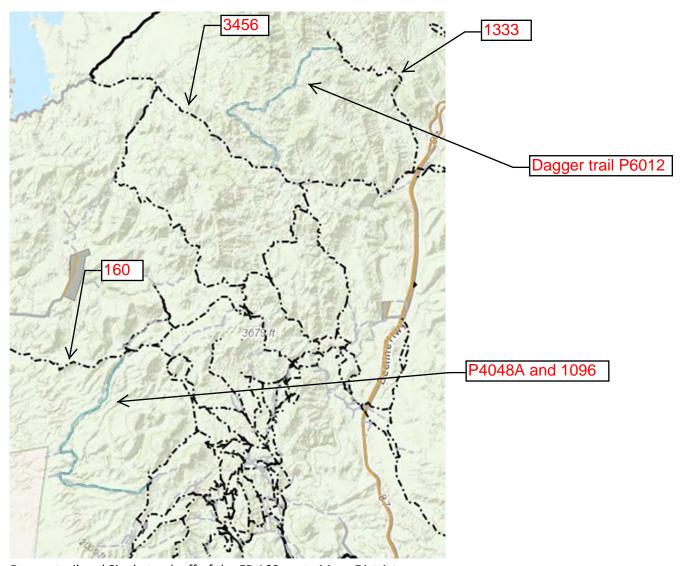
#### Mail Trail

Shown as a Full Size route, 1194 has been a Single track as noted by Arizona Trail Riders comments since 2009. Please keep as single track.

Reason: other than the CCRD, there is little to no Single track on the Tonto.

Issue on figuring out where you are when making comments...........Would have been nice if Non Forest Service Owned parcels actually had names ......Like what town is this? Or Similar name such a what ranch.....would allow public some type of land mark to find their location or favorite trail.

Additionally, RATM number routes would be nice if all had that noted in description......some of us navigate by your old maps.



Dagger trail and Single track off of the FR 160 route Mesa District

Dagger trail P6012 single track. This route has been a work project for Single track OHV thru both ATR and TRAL over the years. Since TRAL started working with the Mesa District.....this and the south single track route have been considered part of the Mesa Single track System.

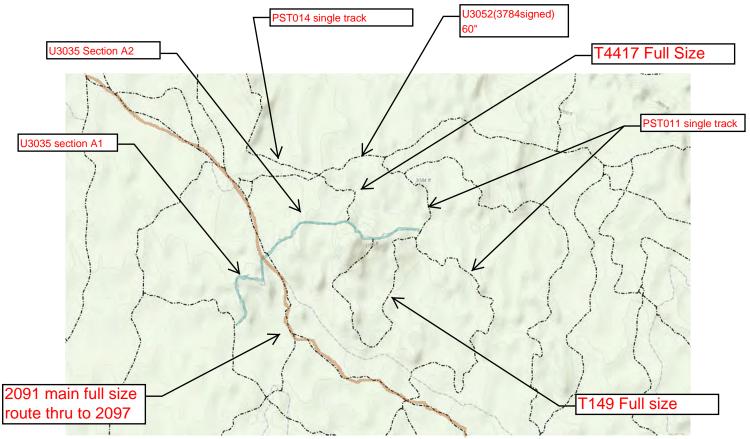
Please consider keeping these 2 routes open for an awesome single track experience.

Dagger trail starts On the 3456 route (full size) and runs north and east to 1333(full size).

With the 1333(full size) route as a dead end, connecting the P6012(Single track) trail allows a great flowing single track thru beautiful terrain to connect to a dead end route and make a great loop trail back to Log corral Road(3456).

The second southern route is made up of P4048A(Starts in north from 160B) and connects to 1096 C Which connects to the 1852 (full size ) route. P4049 and 1096 D would be decommissioned. This has a diversity of terrain and views not found together elsewhere on the Mesa district.

Please consider keeping these 2 special trail open.



Decom. and full size from single track to single track CCRD 2091 area west end

The decommissioned routes U3035 (we will call them section A1 And A2) have been part of one of the most popular loops for single track in this area of CCRD single track.

(See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

This route is part of the Master plan for CCRD.

The south section of U3035 from intersection of U3027 and running to the 2091 in the north is a tough A ride that is an alternative to the easy U3035 to MT513. Challenging sections like this Allow more advanced rider a chance to test themselves on tougher trails and less experience riders to still have the easier route back to the 2091 as a loop.

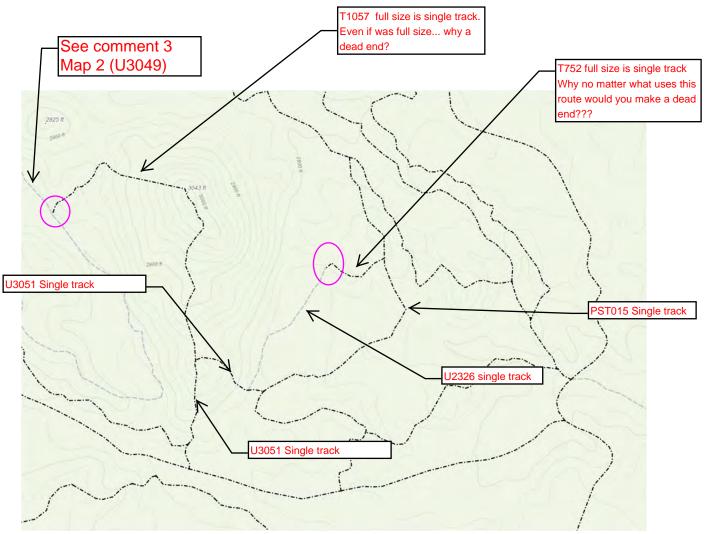
The continuation of the U3035 north of the 2091 is a Mid level difficulty trail and is also access to Trials bike areas that have popped up since 2015. Very popular with the trials bikes these routes are not accessible without this route and the popular loop that U3035 is a big part of is not possible without this section.

#### multiple issues with miscoded routes also are in this area.

T4417 is shown/designated as a Full Size route......it is accessed from U3052(less than 60") and either dead ends at a decom. U3035 or a Open U3035 Single track.

T149 designated full size route, starts on PST011(single track) and either dead ends at a Decom U3035 single track or a open U3035 open single track.

Either way, you cant have a full size route accessed from a small designated route from both ends. Please fix coding.

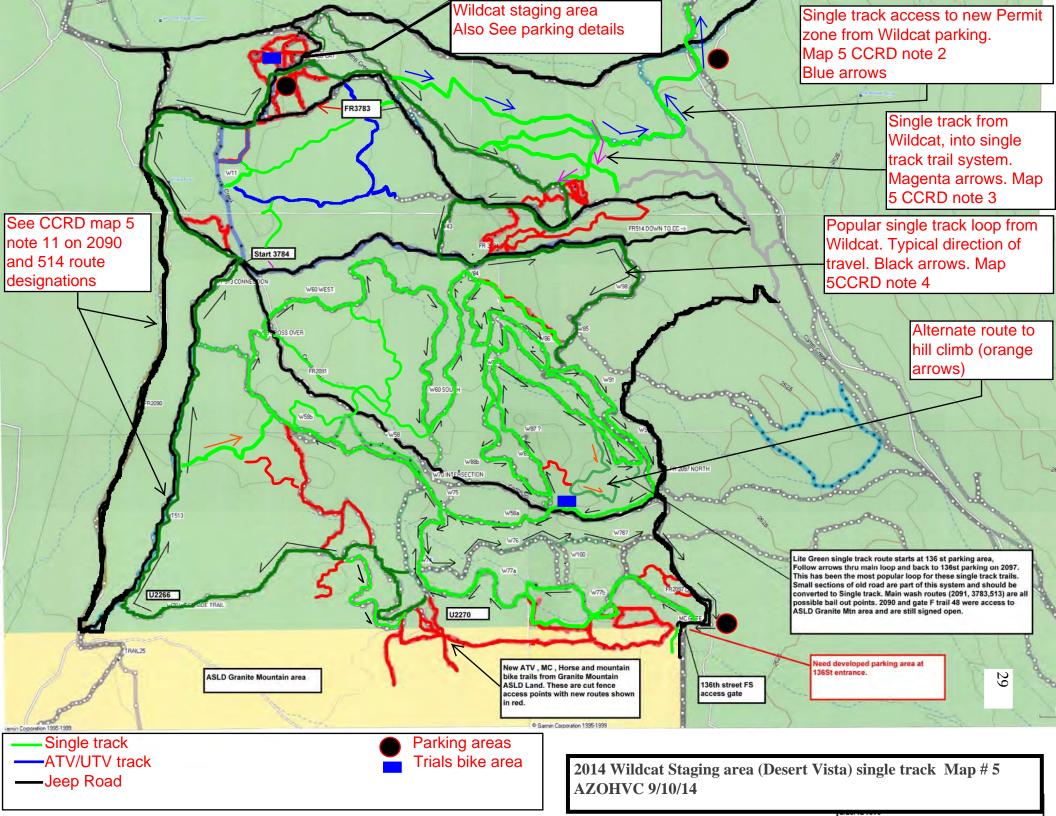


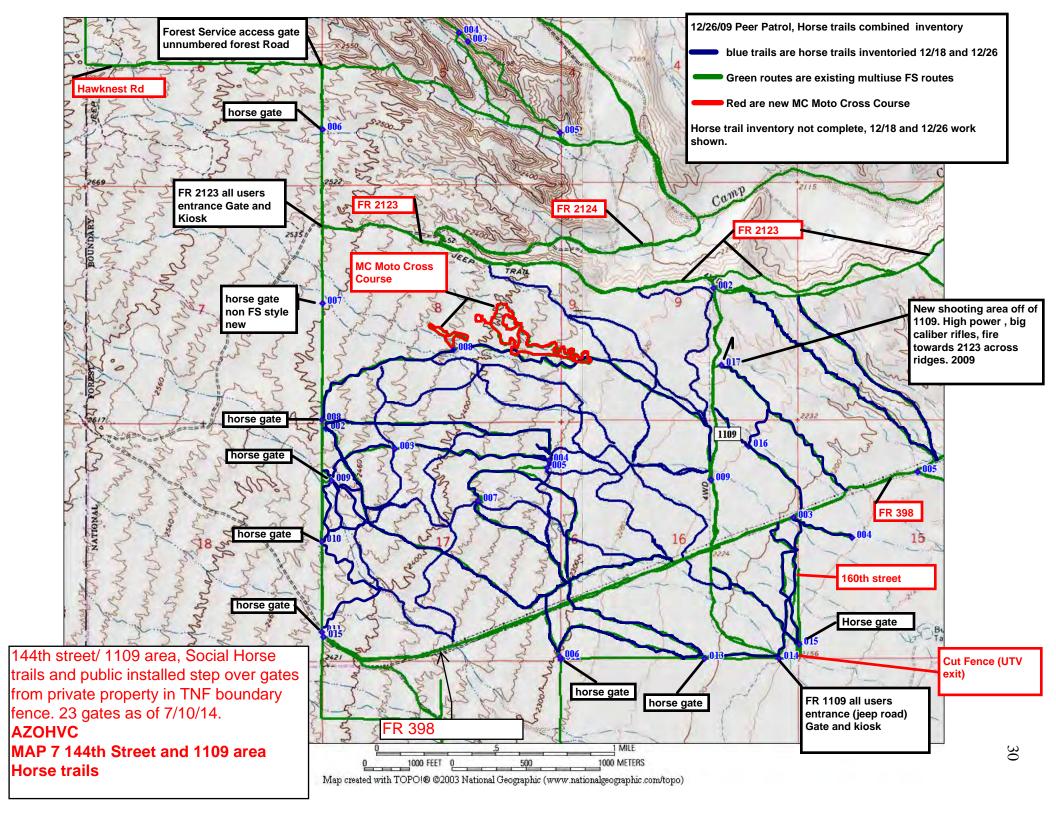
T752 is show as a dead end 4x4 that is accessed from a Single track trail (PST015). U2326 decom should finish Loop PST015 to U3051 AS st.

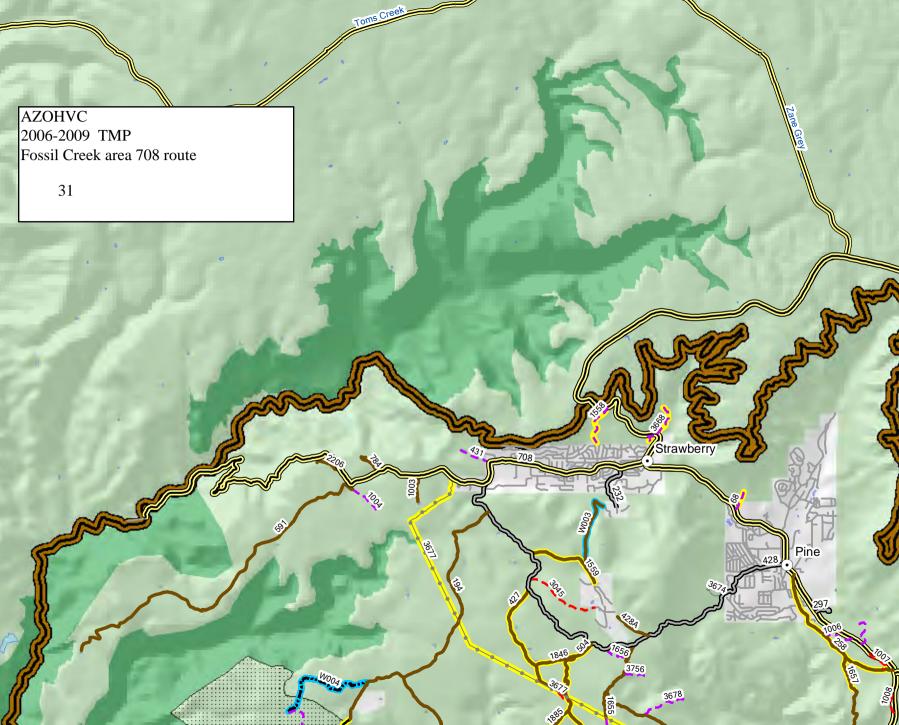
T1057 is full size accessed only from Single track and dead ends

(See accompanying Map 5, "2014 Wildcat staging area\_Desert Vista single track" for details on How the trails are connected and used.)

Keep U2326 open as single track

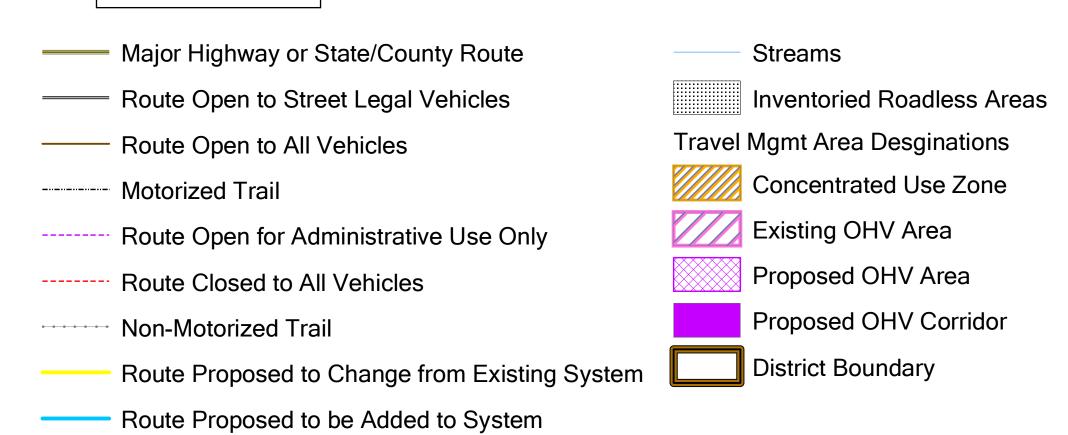


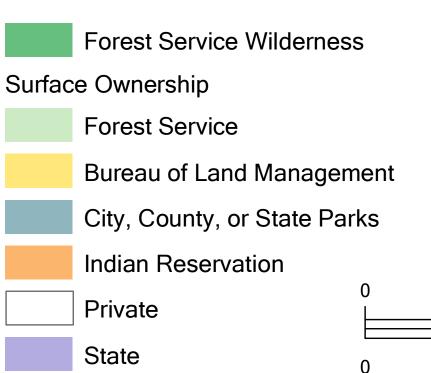


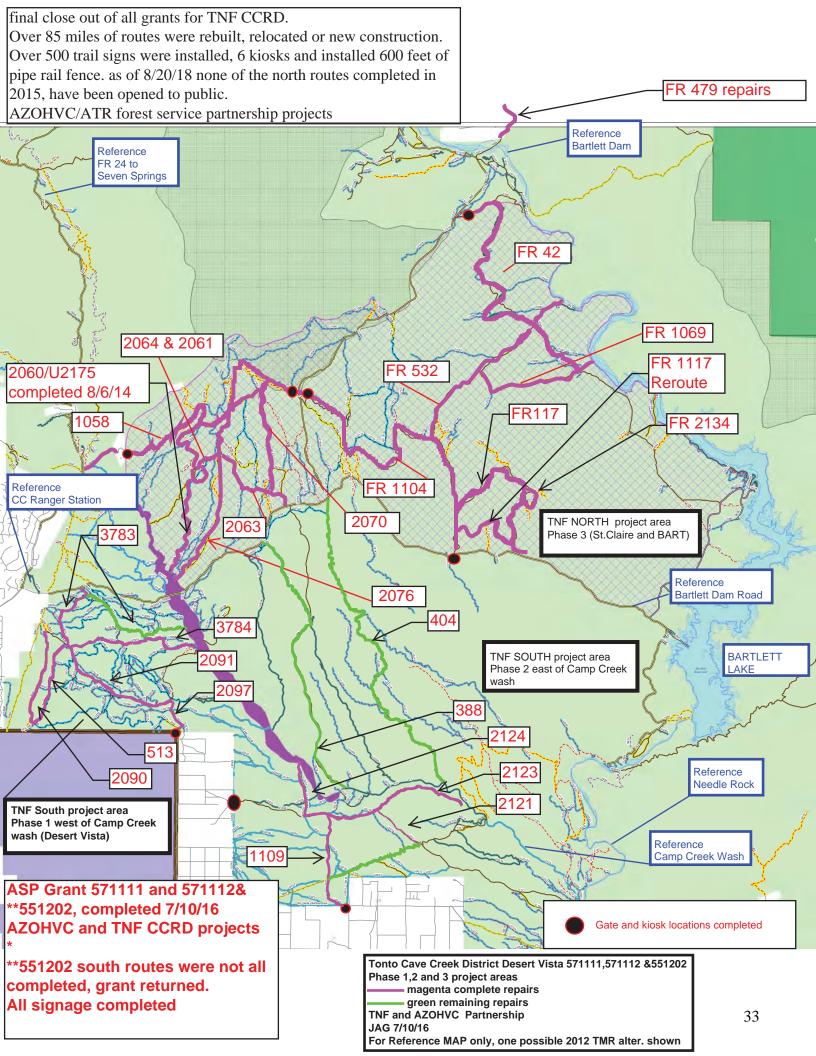


Legend for 708 Fossil creek map

# Cave Creek Ranger District, Tonto









Forest Service Cave Creek Ranger District

40202 N. Cave Creek Rd. Scottsdale, AZ 85262 Phone: 480.595.3300 Fax: 480.595.3346

File Code: 1580

Date: February 13, 2015

Mickey Rodgers Recreation Arizona State Parks 1300 W. Washington Street Phoenix, AZ 85007

Final close out for north routes projects AZOHVC wrote the grants, implemented the projects, wrote the reports and provided the required matches to the grant.

Re: Close-out letter for Grants 571111 and 571112

Dear Mr. Mickey Rodgers,

This letter represents the final close out and completion of the Arizona State Parks OHV Grant 571111 and 571112, which includes invoices 080614 1a and 123014 1a.

These projects were a very important first step in creating a first class OHV /multi-use recreation system on the Cave Creek Ranger District of the Tonto National Forest. This project created the frame work for some of our future routes and trails once the Forest Travel Management planning is completed. Future reopening of this area would have been significantly delayed if not for the work completed in these project grants.

Additionally, these projects and the grants themselves would not have been possible if not for the Forest Service partnership with Arizona Off Highway Vehicle Coalition. From identifying the need, to writing the grants, to construction and signage, AZOHVC has made this project possible and successful.

More than 70 miles of Forest roads were reconstructed in the Bart/St. Clair area, north of Bartlett Dam Road. This area has been closed since the Bart and Cave Creek Complex Fires in 2007 and 2005, respectively. Months of field time by AZOHVC's Jeff Gursh and Paul Blomberg went into GPS work to identify and flag routes in this area. Many of the routes were only located from old maps and previous GPS track logs of area due to the amount of erosion.

AZOHVC worked directly with Tonto staff to solve field problems and make changes to both grants to allow maximum use of grant funds while still keeping within the approved scope items and grant timelines. All work was done within budget, including the additional repairs to routes that were damaged by the unprecedented storms in September and October of 2014. The ability of AZOHVC to develop and implement solutions to route problems is one of the reasons the Forest Service works with AZOHVC on large projects such as this.

AZOHVC willingly donated time and materials to complete the approved grant project and additional work needed to make this project a success. Mr. Gursh worked directly with two private property owners with mining claims to find solutions to gate access issues and worked with both Forest Service and MCSO Law Enforcement Officers to create an emergency access



map of this area, which included the type of vehicle access for various routes and the location of gates and what was required for gate access.

Finally, the Cave Creek Ranger District would like to thank State Parks Grant Coordinator Bob Baldwin for his time and knowledge of the grant process and his willingness to work directly with me, our recreation staff, and the AZOHVC partners. Partnerships like this will allow the Tonto National Forest to continue to improve our trail systems and create responsible OHV/multi-use recreation areas that are enjoyable to the public and sustainable for Forest health.

I look forward to working with you and continuing our partnership with Arizona State Parks in the future.

Sincerely,

Sincerely,

LOUISE D. CONGDON

District Ranger



Forest Service Cave Creek Ranger District 40202 N. Cave Creek Rd. Scottsdale, AZ 85262 Phone: 480.595.3300 Fax: 480.595.3346

File Code: 1580

Date: June 25, 2015

Mickey Rogers
Recreation Grants Coordinator
Arizona State Parks
1300 W Washington Street
Phoenix, AZ 85007

Typical issue is late payment from ASP.

Note that this payment was not made until late September 2015 Start of Project 551202 was 11/8/15. Delayed new project work.

Re: Payment and Closeout of AZ State Parks Grants 571111 and 571112

Dear Mr. Rogers,

I am enquiring about the current disposition of final payment for two Arizona State Parks grants that were completed on the Cave Creek Ranger District. Our Partner, Arizona Off Highway Vehicle Coalition (AZOHVC) submitted the required final paperwork and work history documents to your office on January 18, 2015. Two separate letters were sent to you from my office dated February 10, 2015 for Invoices 123014 1a and 080414 1a. I followed these letters up with our closeout letter dated February 13, 2015. I inspected much of this work myself, and my recreation staff inspected it all. I was very satisfied with the final product; I had seen its original condition. To date, our project partner, AZOHVC, has not been paid for the work they accomplished. These two outstanding invoices come to a total of \$13,245.03. The breakdown is as follows:

- Invoice # 080614 1a for \$5770.20
- Invoice # 123014 1a for \$7474.83
  - o This invoice is split between 571111 at \$5376.97 and 571112 at \$2097.86

I am concerned with the delay in payment for our grant work. Payments in the past have generally been fairly timely. Unfortunately, this is the second payment in a row that has required calls or letters. The 4th payment for these grants was 3 months behind. This closeout/final payment is over 4 months outstanding. I am asking for your assistance in checking into these grants and expediting their payment.

Until these payments can be settled, I have asked my partner to not move forward with our third State Parks grant (551202). I do not wish to accrue further debt in their name. This third grant is Phase 1 of the Desert Vista OHV Trail System. I would also like to request a 6-month extension on the completion due date for this third grant from the date that payment is sent for the above completed grants.

Closure of these first two grants is needed so my staff can apply for additional OHV funding



(50% completion of outstanding grants required). There is a great deal of work that still needs to be completed in the Bart/St. Claire OHV and the Desert Vista OHV permit zones on the Cave Creek District in preparation of the Tonto National Forest Travel Management decision. This critical work is not possible without funding from your program and the assistance from our OHV partners.

I consider the AZOHVC to be a critical partner for accomplishing OHV related work on my district. Without their support and partnership, the proposed Bart/St. Clair OHV zone would be nowhere near ready for opening shortly after the Travel Management decision is signed. They have accomplish all of the most difficult work so far, including repair of Bart/St. Claire roads damaged after our record-breaking rain events in August and September 2014 that had been repaired prior to these events. Despite months of hot weather (which limits the time of year road work can be affectively accomplished), fire restrictions and the government shutdown for three weeks in 2014, these projects were completed on schedule. AZOHVC has remained my constant, hardworking, and cooperative partner for the last five years. I have not found another partner to have as much knowledge of how to maintain/use heavy equipment or the knowledge base for correcting the severe erosion issues that existed within the Bart/St. Claire zone so a sustainable road system could be re-established. I depend on them. Your funding makes that possible.

I have enjoyed an open and positive working relationship with AZ State Parks for the last five years. I look forward to continuing and building on that relationship with you. If there is a time for you and Susan Black to come out this fall to see the good work that has been accomplished, I would love to host you on a tour. Until then, I am available to visit with you at your office and show you via power point what your funding has allowed me to accomplish with my OHV program on Cave Creek. Your support has been priceless.

Sincerely,

Louise D. Congdon District Ranger

Enclosure: February 10, 2015 Invoice Letters, February 13, 2015 Close-Out Letter

Cc: Susan Black, State Parks Director