



Neil Bosworth and Reviewing Officer – Tonto Forest Plan Revision
2324 E. McDowell Road
Phoenix, AZ 85006

Uploaded to CARA on August 26, 2022

Subject: Objections to The Final Revised Land Management Plan (LMP), Final Environmental Impact Statement (FEIS), and Draft Record of Decision (Draft ROD) for the Tonto plan revision

These objections are being submitted on behalf of Tonto Recreation Alliance by:

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Comments were filed by Tonto Recreation Alliance during the comment period for the Tonto Forest Draft Forest Plan (DFP) and Draft Environmental Impact Statement (DEIS) on March 11, 2020 and these objections relate to comments previously submitted. The document containing these comments is attached to this objection document.

Please see the following pages for a description of objections.

Thanks for the opportunity to comment and object during the development process of the Tonto Forest Plan.

A handwritten signature in black ink, appearing to read 'Rich Smith', is written over a white background.

Rich Smith

President

Tonto Recreation Alliance

These objections relate to the Recommended Wilderness Areas (RWMA) section of the Tonto National Forest Land Management Plan.

We previously commented on this section of the draft plan with the following from Attachment 2 of our comment document:

6. Recommended Wilderness Areas (RWMA): Page 133: Recommended Wilderness Areas (RWMA): Page 133: The commenters do not support any recommended wilderness management areas that would impact motorized recreation on existing routes approved in the travel management decision. Specifically, we do not support any RWMA's that create an envelope around routes designated as open in the Travel Management Plan even if the route has a protecting corridor buffer zone. This type of action effectively prioritizes wilderness over the established motorized recreation route system that was 10+ years in the making and creates potential conflicts even when an open motorized route is protected by a corridor

We still stand by the comment that wilderness areas should not be designated in areas where motorized routes have been designated by the Tonto Travel Management Decision. Several of the recommended wilderness areas in the plan contain roads and trails that have been designated as open. This approach is in direct conflict with the fundamental character that makes a wilderness area desirable. We request that wilderness areas containing designated motorized routes be eliminated from the plan.

Corridors in Recommended Wilderness Areas Not Drawn Correctly

Notwithstanding the above objection, there are issues with the location of corridors drawn around designated motorized routes in the recommended wilderness areas.

Tonto Recreation Alliance has done extensive inspection and monitoring of motorized routes in the Tonto National Forest. We have captured tracks representing the actual locations of most routes designated as open through the Travel Management Process. A comparison of the actual location of motorized routes vs. Tonto National Forest GIS data and the related recommended wilderness area corridors shows issues with the drawing of these corridors.

This objection does not list all of the issues with these corridors but only shows a few illustrative examples. TRĀL's GPS data is available upon request to the Tonto for use in correcting the locations of the corridors.

We request that the Tonto use TRĀL's data representing actual locations of motorized routes to check and correct the locations of corridors drawn around motorized routes in the Recommended Wilderness Areas.

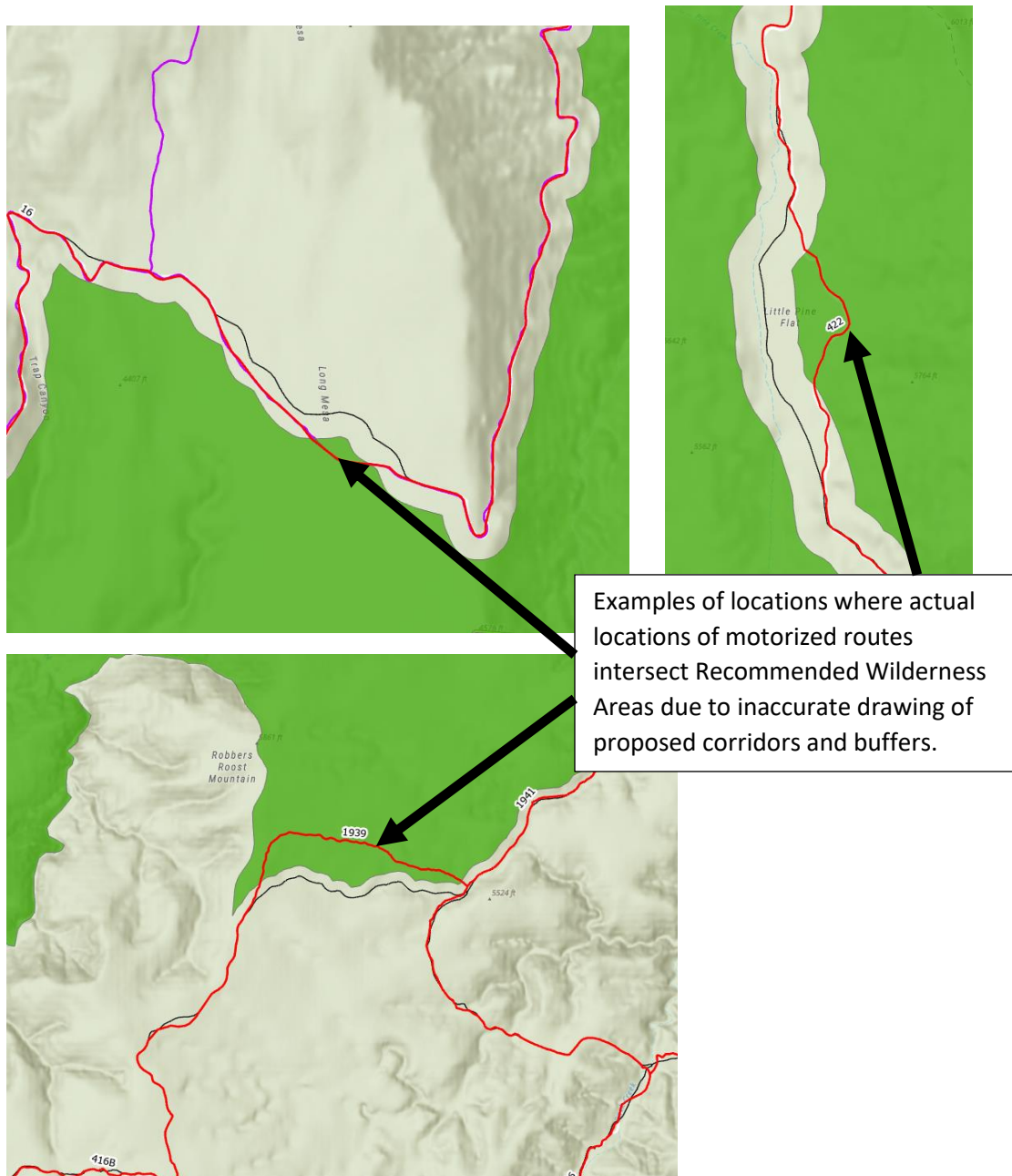
See examples of Recommended Wilderness Area motorized route corridor issues on the following page.

Examples of Issues with the Recommended Wilderness Area Buffers Drawn to Exclude Motorized Routes

The examples below show issues with the drawing of corridors and buffers around the GIS data representing motorized routes in or near Recommended Wilderness Areas.

The green shaded areas are the Recommended Wilderness Areas from the Tonto's data. The gray lines are the Tonto's GIS data representing the assumed locations of motorized trails designated through the Travel Management Process. The red lines are TRĀL's data showing actual locations of these motorized routes on the ground. TRĀL's GPS captured route locations are also supported by satellite imagery.

It can be clearly seen that the corridors and buffer areas meant to exclude the motorized routes are not in the correct locations based on actual location of the routes. The green Recommended Wilderness Areas overlap several sections of the actual route locations.





Reviewing Officer – Tonto Plan Revision

March 11, 2020

2324 E. McDowell Road

Phoenix, AZ, 85006

Uploaded to CARA on March 11, 2020

Subject: Comments to Tonto Forest Draft Forest Plan (DFP) and Draft Environmental Impact Statement (DEIS)

The following comments to the Tonto DFP and DEIS are submitted on behalf of the nearly 5000 volunteers and members of the Tonto Recreation Alliance, Arizona Trail Riders and Arizona Off-Highway Vehicle Coalition (collectively referred to as the “commenters”)

The Tonto Recreation Alliance (TRĀL) is a non-profit volunteer group which has been working with the Tonto National Forest since 2009 logging more than 37,000 volunteer hours in support of the Tonto Forest. The TRĀL volunteer organization has over 500 registered volunteers who are multi-use recreational enthusiasts participating in activities including 4WD, UTV, ATV, off-road, adventure and trials motorcycles, hunting, fishing, hiking, camping, mountain biking, and others. Points of contacts are:

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The Arizona Trail Riders (ATR) are the largest off-road motorcycle Club in the state of Arizona with over 250 members who are multi-use recreational enthusiasts participating in 4WD, UTV, ATV, off-road, adventure and trials motorcycles, hunting, fishing, hiking, camping, mountain biking, and others. The club is a leader in promoting responsible OHV recreation locally and across the nation. ATR members are encouraged to get involved volunteerism and active support of their sport with land managers and legislators. Point of contact is:

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The Arizona Off-Highway Vehicle Coalition (AZOHVC) is a non-profit organization dedicated to developing working relationships with land managers and legislators in order to preserve recreational trails and recreation access to public lands. The AZOHVC supports responsible OHV recreation and represents more than 4000



recreational enthusiasts who enjoy all aspects of motorized recreation along with hunting, fishing, hiking, camping and others. Members organizations include: Arizona State Association of 4 Wheel Drives (ASA4WD), Family Motor Coach Association of 4-Wheelers (FMCA 4 wheelers), Arizona State 4 Wheel Drive Foundation and County Line Riders Horseback clubs.

Point of contact are:

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On behalf of these commenters please find enclosed the following:

- 1) Attachment 1: Comments on the Draft Environmental Impact Statement
- 2) Attachment 2: Comments on the Tonto Forest Draft Forest Plan

Thank you for the opportunity to provide comments.

Rich Smith

President

Tonto Recreation Alliance





Attachment 1:

Comments on the Draft Environmental Impact Statement – Supporting a “Modified Alternative B”

In general the commenters support the concepts of adaptive recreation management, increasing public recreation access to the forest, multiple use strategies (i.e. share the trails), greater emphasis on recreation (all types) as a forest priority, sustainable recreation practices and protection/restoration of riparian areas. Alternative B emphasizes many of these concepts by balancing demands for recreation access with desired natural resource conditions. However, we believe that a better alternative is a Modified Alternative B.

During the time of the previous forest plan recreation was not a top Forest priority. Fee-for-use programs generated funding to maintain and improve developed recreation opportunities but a lack of funding/staffing for dispersed recreation resulted in significant deterioration of the user experience and unmanaged impact to forest health. Motorized recreation was perhaps impacted the most when this lack of priority and funding was combined with repeated delays in the Travel Management Plan. Essentially, motorized recreation has remained unattended and unmanaged for more than a decade. The results on both users and the forest are many and significant. Given that motorized recreation users make up the largest percentage of recreational users on the Tonto National Forest (23% - ref Tonto Forest Plan DEIS, page 87) we believe that this deserves a higher priority and specific objectives in the forest plan.

Quoting from several sources:

- During the past ten years, off-highway vehicle use has increased dramatically across the nation and on millions of acres of public land in the Western United States. In Arizona, off-highway vehicle use has increased by 347 percent since 1998 (Arizona Game and Fish Department, 2013), outpacing existing funding to manage that growth, protect natural resources, and maintain safe and reasonable recreational access.
- In 2005, the Chief of the Forest Service declared unmanaged recreation (and specifically unmanaged motor vehicle use) one of the four threats to the National Forest System. Managing motorized recreation is particularly challenging on the southern districts of the Tonto National Forest with their fragile desert ecosystems and high demands for motorized access. (Ref: Tonto Forest Proposed Forest Plan)
- Recreation continues to be one of the top three priorities for Southwestern Region 3. (Regional Office RHWR – Briefing Paper on the Sustainable Recreation Strategy, dated 2-5-20)
- “Increasing priority placed on motorized recreation in the Tonto will have a big pay-off in terms of forest health and responsible forest use by the off-highway vehicle (OHV) community and this should be incorporated into the proposed plan as both a management approach and a specific objective in the motorized recreation section.” – Tonto Recreational Alliance (Ref: Tonto Forest Proposed Forest Plan)

Recommended Changes for Modified Alternative B

The commenters recommend that Alternative B be modified to reflect significantly increased priority and resourcing for motorized recreation projects during at least the first five years following Forest Plan approval. This recommendation is aligned with stated agency priorities. The benefits to forest health and the user experience would be significant and perhaps some of the most impactful actions the agency could invest in. Further, these benefits would also impact the largest group of users who recreate on the forest.



Forest Plan Changes that would reflect this direction and priority could include:

- Desired Condition:
 - A pro-actively managed, consistently funded motorized recreation program built upon responsible and sustainable OHV recreation principles.
 - A continuously improving motorized route system that is sustainable, provides a great user experience and that is embraced, maintained and supported by users (stewardship).
- Management Approach:
 - Prioritize motorized recreation funding, staffing, initiatives and projects for at least the first five years of the Forest Plan to begin reversing the effects of prior lack of management.
 - Proactively access Arizona State OHV Program Funds as well as other funding sources (such as the Recreational Trail Program) specifically established to support motorized recreation projects.
 - Build stewardship in the motorized recreation user community through pro-active collaboration and engagement with volunteer groups and partners.
- Objective: Complete six - eight motorized recreation projects that could include rapid implementation of the travel management plan, repair/re-routing of unsustainable trails, restoration of previously impacted areas, improving user facilities such as staging areas and addressing user needs that were not addressed in the travel management decision (e.g. motorcycle single track, rock-crawler routes, long loop trail systems).

The commenters stand ready to collaborate with the Forest to develop desired conditions, management approaches and objectives that would benefit both Forest Health and the Motorized Recreation User Experience going forward. We would also be happy to spearhead the effort to engage other motorized recreation groups in this process.

Attachment 2 - Comments to the Draft Land Management Plan

1.0) Partnerships and Volunteers (PV)

- 1.1) Page 20: Management Approaches for Partnerships and Volunteers: The Commenters believe that the proposed language does not go far enough in committing Forest Resources to not only enable but to make sure their partners are successful. The Forest makes a strong case that partners and volunteers are a critical part of delivering their mission. Such a critical component of success warrants a stronger commitment of resources, willingness to adjust processes and procedures plus organizational and/or cultural change where needed to capture the value of partners.

2.0) Recreation (REC)

- 2.1) Page 21: (REC) Paragraph 3, line 4: Change four-wheeling to “Off-Highway Vehicle Recreation”
- 2.2) Page 22: (Rec-O-05): This objective is to “develop or modify 2 to 8 systems of sustainable designated motorized and non-motorized trails (e.g., mountain biking, equestrian, motorcycle, jeep, and all-terrain vehicle trails) to adequately provide for these user groups and reduce user conflicts. We believe that a definition of “system” should be provided in the plan. We also suggest that the reference to “jeep” be replaced with “full-sized off-highway vehicle”.
- 2.2) Page 23: (Rec-G-03): The proposed language prioritizes minimizing resource damage over all other considerations for recreation developments and improvements. While this is a “guideline” the wording is not consistent with REC- Page 21, paragraph 4 which emphasizes the consideration and balancing of other factors (e.g. economic and social factors). We recommend that this section be changed to “Recreation developments and improvements should be planned, designed, and managed for long-term sustainability considering all effects and benefits using the best available sustainable recreation practices”

3.0) Dispersed Recreation (REC-DIS)

- 3.1) Page 26: (REC-DIS-G-06), Line 4: Even though this is a “guideline” the wording “Fall-line trails should be avoided” is un-necessarily prescriptive and could limit trail builders trail design options. There are cases where fall-line trails are actually more sustainable than non-fall-line trails (e.g. machine-made non-fall-line trail versus a hardened decomposed granite type surface on a fall-line).

4.0) Motorized Recreation (REC-DIS-MO)

- 4.1) Page 27: (REC-DIS-MO), Paragraph 1: This paragraph appropriately defines “motorized recreation” however it does not address the fact that other forest users utilize motorized vehicles and the motorized route system to access their particular recreation preference such as hunting, fishing, hiking, rock climbing, etc. The commenters suggest that the definition of motorized recreation be expanded to include this important forest use of the motorized route system for other recreation uses.

- 4.3 Page 27 Desired Conditions (REC-DIS-MO-DC-02): The wording for this desired condition reflects that staging areas and access points should be “dust free and in convenient locations”. The commenters believe that “dust free” is an unobtainable condition and this should be revised to say “should be located in convenient locations and use dust management best practices”. Additionally, no mention is made about providing facilities and services that are necessary or valuable to users. The commenters request that wording be included to capture this intent.
- 4.2) Page 28: Motorized Recreation (REC-DIS-MO-S-02): Including the examples provided in this section (e.g. avoiding hilltops, ridges, any route alignments with greater than 10% surface grade, etc.) as a standard is overly prescriptive and in many cases this guidance may not be consistent with the most sustainable trail building practices. Please delete these prescriptive examples leaving the standard as “current sustainable construction and design standards for motorized trail building principles”
- 5.0) Recreational Shooting (REC-DIS-RS): Page 31” REC-DIS-RS-G-03: There are several areas in the forest where recreational shooting takes place in close proximity to motorized and non-motorized trails creating very high safety hazard for trail users. We request this section be modified to reflect a higher standard for protecting trail users. One possible way to do this would be to modify item “a” to read “within a minimum of one quarter mile from developed recreation sites and approved recreation roads and trails” or alternatively “current and future target shooting areas must have an established adequate safety buffer zone”.
- 6.0) Recommended Wilderness Areas (RWMA): Page 133: Recommended Wilderness Areas (RWMA): Page 133: The commenters do not support any recommended wilderness management areas that would impact motorized recreation on existing routes approved in the travel management decision. Specifically, we do not support any RWMA’s that create an envelope around routes designated as open in the Travel Management Plan even if the route has a protecting corridor buffer zone. This type of action effectively prioritizes wilderness over the established motorized recreation route system that was 10+ years in the making and creates potential conflicts even when an open motorized route is protected by a corridor.