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Organization:

Title:

Comments: Dear USDA Forest Service,

Thank you for the opportunity to comment on the Arizona National Scenic Trail Comprehensive Plan.

My comments are based upon my involvement with the ANST as follows: Learned about the project in 1988, began volunteering in 1990 with assisting founder in on-the-ground route feasibility, served as the paid coordinator for the project in the 1990s (i.e., based out of Arizona State Parks and paid by all Federal and State Partners), and became heavily involved with Arizona Trail Association from 1997 to 2012, and still continue my membership today.

First and foremost, it is apparent much work has gone into this document, and I commend the authors.

Secondly, while it contains all the needed components for a national scenic trail, it is missing a few items of importance as follows:

In Chapter One with the mention of Arizona Trail Association (ATA) being formed in 1994, please add the following (and ATA will have additional comments): As the 1990s drew to a close, and Arizona State Parks could no longer serve as the lead for coordination of the monumental endeavor, Arizona Trail Association began to shoulder the day-to-day coordination of the project with an emphasis of having a completed border-to-border continuous corridor by the State's centennial - 2012. While working closely with all partners, ATA secured millions of dollars of private monies, coordinated paid trail crews, maintaining excellent relationships with all land managing agencies, and developed a comprehensive volunteer undertaking for the entire corridor. To this day, ATA continues the large day-to-day coordination of the ANST, to include much success in replacing road mileage with single-track sustainable trail. Since the late 1990s, ATA has been the driving force of the ANST.

In Chapter Four, a section needs to be added titled Threats to the ANST. Within this section, new narrative is needed on the proposed copper mines on State Trust and BLM lands that will not only affect significant miles of ANST, but the viewshed protection that is recommended within this Plan. These proposed copper mines are major threats to the ANST. Other threats that deserve narrative are the large wildfires affecting the ANST, and interface/safety issues with rapidly developing areas such as Flagstaff.

Since Chapter Six - Implementation is really the "teeth" of the Plan, there really needs to be some language for USDA Forest Service - Regional Office actions that only the Forest Service has the authority to do (i.e., thus one of the whole reasons for ATA to pursue National Scenic Trail Status), and items that a non-profit organization does not have the authority to do. Samples of these should include the following:

1. The Regional Office shall ensure that the Coronado, Tonto, Coconino, and Kaibab National Forests always make it a priority to ensure the highest quality experience using all recommendations within this Plan, to include replacing road mileage with new single-track sustainable trail.
2. The Regional Office shall ensure trail closures and hazardous conditions do not occur during forthcoming forest thinning operations.
3. The Regional Office shall stay abreast of all threats to ANST identified in Chapter Four on all land designations, and use Federal authority to influence the best possible scenarios and protection for the ANST.

4. The Regional Office, working closely with ATA, shall work closely with Arizona State Land Department to ensure trail alignments are not subject to being moved or expired.
5. The Regional Office and affected National Forests, working closely with ATA, shall ensure close coordination with Arizona Department of Transportation for safe ANST trail underpasses at all highway interface locations.
6. The Regional Office, working closely with ATA, will work closely with Department of Homeland Security on border issues that may affect the ANST.
7. The Regional Office shall employ a full-time ANST coordinator position, to be located in Arizona.

And finally, a few other items in the document need correction:

Page 158 states "128 miles of the ANST is on roads" - this figure is very outdated. Page 159 incorrectly states that one-third of the ANST is on roads. The same errors are on page 187.

Page 184 does not really address the complexities and vulnerabilities of ensuring protection for the ANST on Arizona State Trust Lands, as these are not public lands.

In the document, there are mentions of converting roads to trails where feasible. In my experience, closed roads are a poor substitute to designing and building sustainable single-track trails. Roads frequently have too steep of grades and erosion problems, and closing roads angers the Sportsman's and OHV communities.

Again, thank you again for the opportunity to comment on this Plan.

Eric Smith, Chino Valley, AZ