



July 28, 2022

Todd Willard, District Ranger
Prescott National Forest
300 East Highway 260
Camp Verde, AZ 86322

Submitted electronically to:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=61156>

Re: Draft Environmental Assessment for Verde Recreation Action Plan

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on the recently released draft Environmental Assessment (EA) for the Verde Recreation Action Plan (VRAP) on the Prescott National Forest (PNF). Areas included in the plan are visited and utilized by a number of our members, as well as others pursuing wildlife-associated recreational activities.

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, youth orientated groups, outdoor recreation groups and businesses from across Arizona, representing more than 25,000 people.

AZSFWC submitted scoping comments in January of 2022 (copy attached), supporting action to address resource and public safety issues associated with members of the public using the forest for non-recreational purposes. Included in those comments were three issues we asked PNF to consider.

1. We recommended the EA analyze the degree to which these issues could be addressed by increased enforcement rather than closure of existing dispersed camping areas.

The EA did not present any formal analysis of this recommendation but did note that under the no-action alternative: *"It is anticipated that enforcement of the 14-day stay policy would be ineffective and problematic and unsafe as it has been in the past. The ability to manage the large numbers of non-recreation related camps within these areas is not feasible. The resource impacts associated with these activities would resume."* (EA p.49).

AZSFWC Comments on Draft EA for Verde Recreation Action Plan – 7-28-22

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087

This begs the larger question; how can the PNF enforce extensive new closures when it cannot adequately police irresponsible public behavior on areas currently open to dispersed camping?

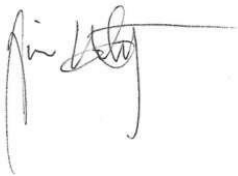
2. We recommended the PNF consider a “no net loss” approach to dispersed camping opportunities on the Verde Ranger District, adding additional camping opportunities (in appropriate areas) to replace those that would be closed under the proposed plan.

The proposed action eliminates 43 miles of existing dispersed camping corridors, increases management on 10 miles of corridors, but does not add any new camping corridors.

AZSFWC is concerned that concentrating recreationists on a smaller area will only exacerbate resource impacts, setting the stage for future closures and lost opportunity for the recreating public. We are reiterating our request that the PNF replace the lost corridor miles with new, appropriately sited dispersed camping corridors.

3. Finally, we requested that the plan provide appropriate access to wildlife water developments maintained by the Arizona Game and Fish Department (AZGFD). AZSFWC notes that this provision has been added to the draft EA and we appreciate the PNF’s coordination with AZGFD to maintain water sources critical to a variety of wildlife species.

Thank you for considering our input and comments!

A handwritten signature in dark ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director