



October 1, 2017

via email: [tontoplan@fs.fed.us](mailto:tontoplan@fs.fed.us)

Tonto National Forest  
Tonto Plan Revision  
2324 E. McDowell Road  
Phoenix, Arizona 85006

Re: Tonto National Forest's Wilderness Recommendation Process

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. We have 34 member organizations and 7 affiliate members representing over 10,000 individuals that reach across the spectrum of wildlife conservation, hunting, angling and shooting groups, youth orientated groups and outdoor recreation groups and businesses from all across Arizona.

We are a strong proponent of sustainable multi-use on our Federal lands including the Tonto National Forest (TNF).

- Access to the land is one of those critical components that we need to ensure remains in place, because all too frequently by dictum, rule or by some administrative declaration, access becomes restricted. We have way too much of that happening across all our Federal lands!
- Your Wilderness Recommendation Process has many of the attributes that subtly could allow implementation or imposition upon us the very thing that eliminates access for the public.
- We are also concerned about the need to maintain access for the Arizona Game and Fish Department (Department), for both administrative purposes as well as active wildlife management. Too often in the past wilderness designations have been an impediment to their statutory responsibilities, and this has been true on the TNF lands with sheep management in particular.

The Multiple-Use Sustained-Yield Act of 1960 and the Federal Land and Policy Management Act of 1976 (FLPMA) prohibit federal land management agencies from affecting the State's jurisdiction and responsibilities, and managers of public lands are mandated to provide multiple-use recreational opportunities on public lands to both present and future generations. We believe conversion of public lands to a special use status is a breach of the FLPMA mandate.

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Arizona Sportsmen for Wildlife Conservation  
PO Box 12590 Glendale, AZ 85318

Most sportsmen and women support public land use that provides Arizona's public and resources with a net benefit, and do not support the conversion of public lands from multiple-use to land use designations that will result in a net loss of wildlife resources, wildlife related recreational opportunities and wildlife dependent economic benefit. Multiple-use is lost forever once any land is designated as wilderness. Therefore, consider the loss of wildlife resources, related recreational opportunities and lost economic benefits.

Arizona currently has 4.5 million acres of designated wilderness and only three states have more than us. We also have an additional 5.8 million acres of land carrying special land use designations, which include; National Monuments, Parks, Wildlife Refuges, Conservation Areas, Areas of Critical Environmental Concern, Wild and Scenic Rivers, and Wilderness Characteristic Areas.

- Special land use designations, such as wilderness, impede access to our public lands, diminish recreational opportunities on the land and also have an adverse effect on the management of wildlife and the effectiveness and efficiency of conservation efforts on behalf of those wildlife resources. The latter occurs with extensive and widespread project delays, elevated costs, increased man-hours and legal challenges.

As you already know, the TNF has over 600,000 acres (21% of TNF) designated as wilderness, with an additional 9% of TNF designated as roadless areas. With nearly one third of the TNF closed to motorized access,

- There is ample opportunity for primitive forms of recreation. Please consider this before creating more acres with wilderness restrictions.
- Accordingly, we request you provide clear and consistent guidance on what activities would and would not be allowed in the areas identified as having wilderness characteristics, prior to completing your analysis.
- Forests must adequately establish a purpose and need for special land use allocations and designations as required by Council on Environmental Quality (CEQ) regulations and Forest Service (FS) guidelines.

Please refer to our AZSFWC Resolution on Special Land Use Designations from March 2, 2015.

[http://www.arizonasportsmenforwildlifeconservation.org/AZSFWC\\_Resolution\\_on\\_Special\\_Land\\_Use\\_Designations\\_Updated.pdf](http://www.arizonasportsmenforwildlifeconservation.org/AZSFWC_Resolution_on_Special_Land_Use_Designations_Updated.pdf)

We request that the following significant issues also be considered in your analysis:

1. AZSFWC supports the Arizona Game and Fish Commission's (Commission) position concerning the loss of multiple-use public lands due to special land-use designations. Analyze the State's concerns on this issue and coordinate with the Commission to ensure you have complete understanding of their concerns.
2. The conservation of wildlife resources is the trust responsibility of the Department and Commission, and this trust extends to all lands within Arizona, to ensure abundant wildlife resources for current and future generations.
3. Special land use designations have caused the commensurate erosion of the Department's ability to proactively manage wildlife on more than 10.3 million acres; any proposed special land use designation on federal lands must analyze the

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impact to the Department's ability to fulfill its trust responsibility to manage the state's wildlife resources.

One of our primary concerns with your Process is the resolution of the Sierra Ancha Wilderness (SAW) boundaries intersecting Workman Creek Road (487 Road) and Cherry Creek Road (203 Road). The errors in drawing the boundary lines from the 1960's should be an easy fix.

1. First and foremost both roads should remain open in their entirety. These two roads were established as motorized routes prior to the wilderness designation, and were in use as travel routes before any primitive area designations were considered based on historical maps. Consider the social and economic impacts to the local communities, livestock grazing permittees, recreationists, county and State, if public motorized access is removed on critical sections of these two established roads that have been managed as open for decades and utilized by thousands.
2. Workman Creek Road (487 Road) should not have any section closed, as it is the only motorized access roadway
  - a. to the fire lookout tower at the top of Aztec Peak; and
  - b. the private land Murphy Ranch.
  - c. It also provides the only public motorized access to thousands of acres on the central and upper mountain range of the SAW for thousands of recreationists, grazing permit management, State wildlife management, law enforcement, search and rescue, Forest management, and many other land and wildlife management needs.
  - d. Further, fire lookout towers such as the Aztec Peak tower are critical to retain, even if in temporary nonuse, with the unexpected loss of many in recent years to wildfires.
3. Cherry Creek Road (203 Road) should not have any section closed. It provides critical motorized access in a remote rugged area. It is the only motorized access roadway
  - a. to several private land inholdings south and east of the SAW;
  - b. that provides access to the entire east side of the SAW, connecting at the north and south with State Highway 288;
  - c. providing motorized access to thousands of Forest acres between the SAW and the White Mountain Apache Tribal lands;
  - d. that provides critical access for law enforcement, search and rescue; thousands of recreationists, grazing permit management, State wildlife management, Forest management, and many other land and wildlife management needs.
4. We are in favor of a 300 foot buffer for motorized or mechanical maintenance along the roads for both public and private access, which would create a new SAW boundary in these areas.
5. Where those new boundaries take away from a wilderness segment that had existed before, we are in favor of a commensurate acreage adjustment. This may include use of a portion of the contiguous Inventoried Roadless Area lands either

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- on the north, west, or south side of the SAW boundary that contain similar wilderness like characteristics, or other contiguous acres that are commensurate to those removed to adjust the boundary for the 487 and 203 Roads.
6. We believe this matter can be resolved with an administrative “fix” prior to new legislation, but it is not an opportunity to add thousands of acres of wilderness to a landscape that already has limited access. By this, we ask that you consider the congressionally delegated authority provided to the Forest Service Chief and Secretary of Agriculture to remedy issues in Wilderness areas, as specified in law, regulations and Forest Service directives (e.g., the Wilderness Act, 36 CFR 251, 36 CFR 261, 36 CFR 293, and FSH 1909.12, 70).
  7. We also appreciate the desire to protect watersheds and riparian areas from off road abuse; however, we see this as a non-issue on both the 487 and 203 Roads. The adjacent Forest system land is simply too rugged to lend itself to abusive off-road activity.
  8. We support continued access for the Livestock grazing permittees (ranchers) in the SAW area for their ongoing maintenance, management and operations on their allotments. Some of these ranchers and their families have been working allotments in that country for decades. An administrative wilderness boundary error or oversight from the 1960’s that affects the status of these established motorized roadways, should not eliminate the ranchers from their livelihood. Consider the social and economic impacts to the ranchers if motorized access on the 203 and 487 roads was discontinued.
  9. Ensure that you comply with current edicts regarding the size of areas considered to be managed as a wilderness.
  10. Do not use arbitrary or subjective inferences when evaluating naturalness (e.g. appearance). Use the best available science.
  11. In your analysis, clearly define the laws, regulations, and policies specific to multiple-use public lands that would not be disregarded or violated (defining the sections within those edicts) in your effort to analyze “apparent naturalness” or areas with “potential wilderness character” without subjectivity and not -
    - a. affect the ability of the Recreation Program to fulfill their mandates to provide for recreational opportunities and structures, including for individuals with disabilities, allow and provide for campsites, watering facilities for horseback recreationists, or potable water for families camping;
    - b. affect the ability of the Department to fulfill their legal obligations, including building structures and using mechanized equipment and established motorized roadways to assist in the management of wildlife;
    - c. delay the ability of our law enforcement officers or search and rescue teams to access and respond to the needs of the public;

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- d. affect the ability of our university researchers and scientists to use mechanized equipment to collect data or motorized equipment to access an area of study within these public lands.

Please clearly demonstrate why the multiple-use public lands within the Tonto National Forest that have been managed by the Forest for that purpose for over 100 years, benefitting the State and local communities and millions of visitors every year, would now need to have that land designation changed to something completely different (e.g., special land use areas with extensive restrictions) with less opportunities for “all” to benefit from or enjoy.

Further, we ask that you clearly demonstrate based on the Forest’s annual reports for each program area that state the overall good condition of the Forest and its management successes, in addition to all Forest existing management documentation and data, what significant issue was not addressed in the analyses for those documents that would support changing land use status on the Tonto National Forest.

Thank you.

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

Jim Unmacht  
Executive Director