



January 11, 2017

Mr. Neil Bosworth, Supervisor  
Tonto National Forest  
2324 E McDowell Rd  
Phoenix, AZ 85006

**Subject:** Comments on the Tonto National Forest Draft Needs to Change Management Direction of its Existing 1985 Forest Plan (December 2016)

Dear Supervisor Bosworth:

We appreciate the opportunity to participate in the Tonto National Forest (TNF) planning process and the efforts of the TNF Planning Team to address the concerns and recommendations of the sportsmen community. The TNF provides excellent hunting and fishing opportunities for deer, elk, bighorn sheep, javelina, quail, and warm and cold water fish. These species are economically and socially important to local and neighboring communities and the many sportsmen who depend on the TNF for a quality hunting and fishing experience. The quality of the hunting and fishing experience depends on a number of factors including the availability of quality fish and wildlife habitat, reasonable access, and dispersed camping opportunities. Please consider the following comments and recommendations related to *Tonto National Forest Draft Needs to Change Management Direction of its Existing 1985 Forest Plan (December 2016)*.

Generally, we found the draft document was responsive to many of the key issues and challenges facing the Tonto National Forest. However the document does not capture all of the changes to the existing 1985 TNF Plan that are needed to ensure that the Forest continues to provide quality hunting and fishing opportunities in the future.

We recommend the inclusion of the following Need for Change (NFC) statements which were not included or clearly stated in the review draft:

1. **There is a need to manage the TNF to provide quality fish and wildlife habitat for species of economic and recreational importance such as elk, deer, sheep, turkey, quail, native and non-native sportfish.**
2. **There is a need to maintain access to highly valued hunting and fishing areas in the TNF (see the [Arizona Sportsmen's Values Map database](#)).**

3. **There is a need to manage the Forest and adjoining lands in a manner that maintains/enhances wildlife connectivity, movement, and migratory corridors for game species and other wildlife, including “at risk” species.** NFC statement 13 identifies the need for landscape level restoration but does not relate that need to maintaining/enhancing wildlife linkage, movement, and migratory corridors. NFC statement 24 discusses habitat connectivity and species migration for “at risk” species but does not mention migratory game species such as elk and deer.
4. **There is a need to develop strategies for managing Wilderness Areas that maintains and protects wilderness values while providing flexibility to protect and manage fish and wildlife.** Examples of the needed flexibility include but are not limited to the following: allowing for aquatic resource management (e.g., physical removal of noxious weeds, application of chemicals for weed or fish removal), allowing for construction or reconstruction and maintenance of habitat structures both aquatic and terrestrial, allowing for wildlife water development/maintenance sometimes by limited use of motorized vehicle or helicopter, and allowing the Arizona Game and Fish Department to utilize aircraft in managing wildlife as necessary for wildlife surveys, captures and releases as necessary and appropriate.
5. **There is a need to provide direction on the use of motorized big game retrieval (MBGR) and dispersed camping on the TNF that is consistent with national forests throughout Arizona.** Inconsistent rules on MBGR and dispersed camping on national forests and other public lands in Arizona create confusion among forest users and complicate enforcement activities.
6. **There is a need to align the new TNF Plan with relevant strategies in the [AGFD State Wildlife Action Plan](#) and the Four Forest Restoration Initiative Rim Country EIS.**
7. **There is a need to provide direction on the level of coordinated, multi-agency law enforcement support that is needed to address irresponsible target shooting, OHV damage, unauthorized trails and similar problems.** Inadequate law enforcement is a problem today that will continue to get worse as recreation use on the TNF increases in the future.
8. **There is a need to identify priority watersheds and management activities for restoration of threatened/endangered native trout (e.g., Gila trout).**

We understand from speaking with your staff that some of the recommendations above may be outside the scope of the NFC exercise. Nevertheless, we felt it was important to include all these recommendations in our comments because they represent significant issues that need to be addressed in the planning effort.

We recommend that the following NFC statement be changed to read:

**16. There is a need for management approaches to address current and foreseeable stressors in desert ecosystems (e.g., fire, exotic species, and other disturbances) AND to better understand post-disturbance recovery of desert species.**

In the coming months, our organizations intend to develop a sportsmen “vision” for the new TNF plan that protects backcountry lands, provides reasonable access, restores streams and native trout populations, enhances fish and wildlife habitat, provides and protects functioning wildlife corridors, etc. We would welcome Forest Service participation and guidance in the effort.

We look forward to working cooperatively with the Forest Service as the TNF planning effort moves forward. We would welcome the opportunity to discuss these recommendations in more detail. If you have questions or need more information, please contact John Hamill at 928-606-4234.

Sincerely,

Jim Unmacht, President, Arizona Sportsmen for Wildlife Conservation

Rich Williams, President, Arizona Elk Society

Steve Sams, President, Arizona Chapter, National Wild Turkey Federation

Timothy Brass, Backcountry Hunter and Anglers

John Hamill, Arizona Field Representative, Theodore Roosevelt Conservation Partnership

cc Kenna Belsky, Forest Planner, Tonto National Forest

Jay Cook, Regional Supervisor, Arizona Game and Fish Department, Mesa