



May 23, 2022

USDA-Forest Service Southwest Region
Neil Bosworth, Tonto National Forest, Forest Supervisor
ATTN: Objection Reviewing Officer
333 Broadway Blvd SE
Albuquerque, NM 87102.

RE: Tonto National Forest (TNF) Plan Revision Objection on the TNF Final Land Management Plan and Record of Decision

Thank you for the opportunity to provide comment. Arizona Sportsmen for Wildlife Conservation (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 20,000 people.

AZSFWC submits the following comments on the TNF Final Land Management Plan (LMP), Record of Decision (ROD) and related analyses. Our comments identify issues we have concerns about with respect to the interests of sportsmen and women who participate in outdoor recreational activities, as well as the conservation of habitat, stream, and riparian areas. This also includes concerns regarding the TNF's level of analysis and hard look as is required by the 1970 National Environmental Policy Act (NEPA) specifically for:

- ecological sustainability,
- social, cultural, and economic sustainability, and
- forest wide management.

We support many of your final changes to the LMP, including replacing some of the 1985 goals for management and translating them to management approaches, desired conditions, guidelines, or standards and clarifying objectives.

The LMP includes emphasis on ecosystem maintenance, improvement, or restoration. The LMP directs there to be management approaches for revegetation, restoration, and rehabilitation to provide for the conservation of ecosystem diversity and maintain healthy ecosystem functions. Where issues may occur, LMP standards and guidelines direction is to minimize negative impacts such as remove or replace what is causing the issue of concern or implement maintenance, management changes, design element changes, and improve or restore ecosystems. This is particularly important where on-going impacts are unknown and need to be assessed.

AZSFWC Objection to Tonto NF FLMP and ROD – 5-23-22

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

The LMP also emphasizes landscape scale restoration efforts and appropriate vegetation function and species composition. Improving and maintaining sufficient ground cover is a must for increased ecosystem resiliency to changing current and foreseeable environmental conditions and stressors. Terrestrial and aquatic habitat linkages and connectivity for species migration and movement across the landscape, as well conservation and recovery of federally recognized species, and maintaining viable populations of species of conservation concern are underscored.

Infrastructure must be maintained at a sustainable level for multiple use activities (this includes rangeland infrastructure and wildlife habitat improvements or developed waters). Forest management also includes the protection of existing public access and evaluating the acquisition of new public access opportunities.

A forest monitoring strategy that provides information for rapid responses to changing conditions is critical not only for permitted livestock grazing management, but also for management of wildlife habitat and fisheries post-fire.

Based on records and observations, the over 1 million acres of burned landscapes on the TNF during recent years from forest fires including intentional burning, and including expanding human caused wildland fires, without NEPA analysis that includes the potential and now realized detrimental impacts,

- 1) the TNF now has new conditions and information
 - a) that must be and has not been appropriately considered or analyzed
 - i) for the direction provided in LMP standards, guidelines, management approaches, objectives, and desired conditions such as where
 - (1) forest fires have resulted in significant damage to soils and soil cover (causing mass wasting and hydrophobic soils or similar impact),
 - (2) long term damage or permanent loss of vegetative cover for wildlife or fisheries habitat, watershed protection, and forage,
 - (3) long term damage or permanent loss to available surface waters and the landscape that preserves those waters' quality, availability, and safe recreational use (lakes, ponds, natural seeps, developed surface waters such as dirt tanks or springs, or similar sources) from damaged soils, soil cover, or plant communities,
 - b) specific to the Forest lands now needing significant restoration or special long-term management for severely or extensively damaged
 - i) wildlife habitat, fisheries habitat, or rangelands,
 - ii) water developments and rangeland infrastructure important for management or protection of endemic, native, indigenous, or migrant wildlife or domestic animals.

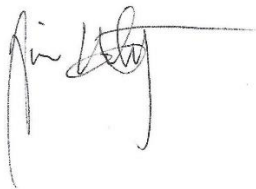
Within these expansive fire damaged areas, there were thousands of acres of protected and managed wildlife habitat, wildlife improvements that wildlife and domestic animals depended on, such as long-established water developments and fisheries habitat that are now destroyed. There are now thousands of acres burned that were analyzed with different watershed, habitat, soil, and rangeland conditions for various ecological units, with a burn severity that changed the soil and plant communities.

This is an important substantive issue for the TNF LMP of changed conditions that significantly impact soil, water, plant community, and riparian conditions that must be

appropriately analyzed. This is in line with the purpose of the revised LMP. Further, this complies with the 1976 National Forest Management Act that requires the Forest to maintain appropriate forest cover, provide for diversity of plant and animal communities, and maintain a natural resource conservation posture that will meet the requirements of our people in perpetuity.

Recent broadscale forest fires intentionally burned based on a wildland fire strategy with no known appropriate level of NEPA analysis, significantly changing the forest landscape, also rendered ineffective the years of efforts by the Four Forest Restoration Initiative (4FRI) planned activities in some areas of significant size. Thus, a need for additional analysis in the development of LMP direction.

We are committed to conserving, restoring, and protecting the unique fish, wildlife, and habitat values of the TNF. We appreciate the opportunity to participate in the review and comment opportunities for the LMP and would like to work cooperatively with the TNF staff to address the issues and concerns outlined above.

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

Jim Unmacht
Executive Director