



March 10, 2023

ATTN: Objection Reviewing Officer
Michiko Martin, Regional Forester, Southwest Region
333 Broadway Blvd SE
Albuquerque, NM 87102

RE: Tonto National Forest (TNF) Plan Revision #51592 Objection on the Tonto National Forest Final Land Management Plan (LMP) and Record of Decision

Thank you for the opportunity to participate in the Microsoft Teams online meeting February 21-22, 2023, to discuss some of our objections and begin work towards resolution. We appreciate you providing the opportunity to submit this follow-up letter for clarification specific to our objections and remedies.

As was shared during the Teams meeting, a key statement within our August 17, 2022, objection letter highlights-

- a. recent significantly altered landscapes over hundreds of thousands of acres on the TNF that have caused landscape scale loss of vegetation and soils, causing greater concerns; and**
- b. a need for the direction in the LMP to ensure available and quality water and forage or browse for wildlife, as well as crossings and corridors in many areas.**

This emphasizes how each of our concerns addressed in the requested remedies, through additions to LMP direction and updated analysis, are interrelated and establish significant or substantive issues.

- We detailed eight (8) specific remedies we again respectfully request be added to the LMP within the Wildlife, Fish and Plants (WFP) component described within each - the Desired Conditions, Guidelines, and Management Approaches.
- These eight remedies are connected to our many prior substantive formal comments, *as well as the issues that arose after those opportunities for formal comments.*

One set of our requested remedies includes ensuring available and quality water and forage for wildlife:

- 1) The LMP **ensures** 39 actions or outcomes specific to water, forage, or plant uses.
- 2) However, the LMP does not include *focused plan direction within the WFP component to **ensure** available and quality water and forage for wildlife, maintained at a sustainable level, including developed water.*

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Hence, we requested the LMP ensure direction be placed within the WFP component to address this, thereby avoiding administrative action injury to wildlife or its habitat.

The final planning rule includes a requirement to ensure that plans provide for the sustainability of ecosystems and resources, watershed protection, wildlife conservation and species diversity.

We appreciate your recognition of the importance of our requested additions (remedies) to the WFP component LMP direction and your consideration of the purpose for each direction statement to meet the intent of the LMP, forest planning regulations and related law. We again respectfully submit this set of four (of eight) requested additions to the WFP component below for your reference.

Desired Conditions (WFP-DC)

09 Wildlife habitats are resilient to disturbances, fluctuations, and extremes in the natural environment (e.g., fire, flooding, drought, climate variability).

Guidelines (WFP-G)

09 Work with partners, Federal and State agencies, and local governments to develop protocols to address the restoration and sustainability of important wildlife forage and cover plants to ensure that healthy sustainable plant populations are available for wildlife use and habitat.

Management Approaches for Wildlife, Fish, and Plants (WFP-MA)

09 Work with partners, Federal and State agencies, and local governments to monitor forage and water quality and ensure forage and water quality and availability.

10 Encourage the development of water sources in uplands where possible to create available quality water when riparian areas or other natural waterways do not provide sufficient water.

- ***Our objections and remedies requested are interrelated components for which the degree and nature of their relationships is well established with constituent elements (water, physical habitat, and a biological environment).***

A second set of our requested remedies focuses on connectivity – crossings and corridors. We appreciate the time you provided to further introduce our related issues and remedies during the first online objection resolution meeting. We offer additional clarification of our rationale for the need to further address connectivity specific to wildlife crossings and corridors:

- 1) Connectivity is key for wildlife and biodiversity. Crossings and corridors are a part of connectivity. The LMP addresses infrastructure for most management areas and components but does not include WFP component direction for the evaluation of needs to construct, define, or maintain wildlife crossings or corridors.
- 2) The 2012 Planning Rule requires wildlife habitat connectivity be addressed in plan revisions as an important part of achieving ecological integrity, ecological sustainability and NFMA's plant and animal diversity.

- 3) Based on the 2012 Planning Rule - A wildlife crossing would be unique to a specific forest or location and could be properly addressed in the Forest Plan.
- 4) Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors was also addressed in an order by former Interior Secretary Ryan Zinke to conserve big-game migration corridors and winter range (Order No. 3362).
- 5) The dangers of wildlife-vehicle collisions have been witnessed across the TNF by many visitors and locals, particularly since the broadscale landscape burning across the forest and loss of established quality and available waters, forage, and habitat.
- 6) Within Public Law 117-58, Nov. 15, 2021, § 171. Wildlife crossings pilot program, 135 STAT. 499, Congress finds wildlife-vehicle collisions present a danger to human safety and wildlife survival – are a major threat to the survival of species, including birds, reptiles, mammals, and amphibians. Funding is provided for Federal land management agencies and not less than 60 percent of the amounts made available for grants each fiscal year are for projects located in rural areas.
<https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>
- 7) There are established efforts to demonstrate the importance of including LMP direction regarding wildlife crossings and corridors, including TNF involvement as part of *The Arizona Wildlife Linkages public and private sector organizations Workgroup* (2006). The National Fish and Wildlife Foundation have records of efforts in Arizona forests to address migration corridors.
- 8) The LMP emphasizes the NEED to develop plan components FOR WILDLIFE that address or provide for terrestrial and aquatic habitat linkages and connectivity for species migration and movement across the landscape. This includes crossings or corridors.
- 9) We believe the Forest Plan does not properly address these requirements and substantive issues directly in the Wildlife, Fish and Plants Plan (WFP) direction components, but rather limits inclusion of certain wildlife and habitat needs through other plan direction components that we believe should be included directly in the WFP section.

A review of the TNF LMP language specific to connectivity, crossings, or corridors:

Examples of LMP guidelines or desired conditions, outside of those specifically for WILDLIFE, that only ***partially*** address connectivity, crossings, and corridors, including wildlife habitat but are NOT a direct Desired Condition, Standard, Guideline or Management Approach for Wildlife.

- a. **Page 35, Guidelines (REC-WR-G) at 03 states:** "Wildlife connectivity for economically important and other species should be maintained and/or enhanced.
– THIS IS FOCUSED ON RECREATION AND ECONOMICAL VALUES.
- b. **Page 61, Guidelines (RD-G) at 04 states:** "When designing or maintaining bridges, design elements that reduce mortality and are beneficial to wildlife (e.g., habitat connectivity, roost sites) should be incorporated."
– THIS IS FOCUSED ON ROADS.
- c. **Page 65, Desired Conditions (LA-DC) at 01 states:** "Land ownership adjustments (e.g., purchase, donation, exchange, or other authority) improve management activities (e.g., consolidating ownership, reducing wildlife-human

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conflicts, providing for wildlife habitat connectivity, improving public access, protection of cultural resources, and retaining or acquiring key lands for fish, wildlife, and rare plants).”

- THIS IS FOCUSED ON LAND OWNERSHIP AND ACCESS

- d. **Page 71, Desired Conditions (ERU-DC) at 11 states:** “Upland vegetation and riparian zones are ecologically connected based on natural patterns that are consistent with landforms and topography and provide for upland and aquatic species movements and genetic exchange.”

- THIS IS FOCUSED ON UPLAND ECOLOGICAL RESPONSE UNITS (which does provide for habitat, but not a direct standard for wildlife)

- e. **Page 72, Desired Conditions (ERU-DC) at 16 h. states:** “In the wildland-urban interface, or where private lands or infrastructure are adjacent to National Forest System lands: When wildland-urban interface intersects vegetation types with a mixed or high-severity fire regime, characteristic ecosystem function is modified to promote low intensity / low severity fire, but with sufficient cover to meet the needs of a variety of wildlife species.”

- THIS IS FOCUSED ON URBAN INTERFACE MANAGEMENT AND WILDLIFE COVER

- f. **There are other sections of the LMP where connectivity for wildlife including crossings and corridors occurs,** but the focus is on the following, not specifically for wildlife:

Watersheds	Classification and recreation use
Design relative to obstructing the flow and allowing passage of aquatic species	Salt River Horses protection along highways

10) Primary and established seasonal wildlife migration routes (potential corridors or crossings) were not included in the LMP analysis – even though connectivity was given a high profile in the 2012 Planning rule.

- a. *Therefore, we believe it is critical to include our recommended additions to Plan components – to assist in achieving and determining condition assessments for connectivity, including crossings and corridors.*

We again appreciate your recognition and consideration of the importance of our requested additions (remedies) to the WFP component LMP direction, and respectfully submit this second set of four requested additions for your reference:

Guidelines (WFP-G)

Within the guideline below add crossings or corridors as follows:

- 07** New infrastructure or constructed features (e.g., fences, roads, recreation sites, facilities, drinkers, **crossings or corridors**, and culverts) should be designed and maintained to minimize negative impacts to the movement and dispersal of wildlife, fish, and rare plants. Infrastructure and constructed features already present that negatively impact movement and dispersal should be modified or removed when no longer in use to improve connectivity. Barriers may be used to protect native species or prevent movement of nonnative species.

Management Approaches for Wildlife, Fish, and Plants (WFP-MA) requested additions:

- 11 Develop and use action plans to: (1) determine wildlife dispersal due to wildland fire or other landscape scale disturbances, (2) map and inventory primary wildlife migration corridors and (3) assess infrastructure alternatives for wildlife crossings where wildlife-vehicle collisions occur affecting human safety and wildlife survival.
 - 12 Collaborate with State and Federal agencies, universities, non-profit organizations, and volunteers to research, inventory, monitor, map, and record data on wildlife corridor or crossing needs. Work to develop educational materials for the public.
 - 13 Work with partners and researchers to identify where alternative approaches to wildlife crossing or corridor management will help meet forest desired conditions and objectives.
- ***Our concerns are judicious and imperative, as was presented, also due to recently significantly altered landscapes on the TNF from hundreds of thousands of acres of broadscale burning and wildfire use, resulting in landscape scale loss of vegetation and soils.***

The final issue of our objections and remedies is specific to recent major federal actions. It is imperative to note the LMP analysis is based on limited to no information specific to recent actions causing landscape scale changed conditions. The limited analysis information is noted below, and includes-

- 1) "Fire regimes" and "patch size" as described in Table 3 (p. 67); and
- 2) that "*most of the vegetation on the forest is adapted to recurrent wildland fires started by lightning from spring and summer thunderstorms*" (p. 103) [versus broadscale landscape burning].

As mentioned, this does not address the recent major federal actions that changed forest conditions across hundreds of thousands of acres from wildland fires that were aggressively and purposefully increased to broadscale burning causing irreversible or irretrievable damage to natural resources in many areas.

The Forests National Interagency Fire Center (NIFC) and Geographic Area Coordination Center (GACC) incident specific data for the southwest reaffirm these recent major federal actions and outcomes.

- 3) **The LMP analysis did not but must take a hard look as required by NEPA at these new conditions and resulting new data, including the losses of watershed structural components beyond normal cyclical change.**
- 4) We respectfully request you also take a second look at the details of our August 17, 2022, objection letter as the forest moves forward to address these significant issues.

We believe this must be done to provide at a minimum:

- the relevant LMP direction,
- be in line with the purpose of the revised LMP, and
- comply 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

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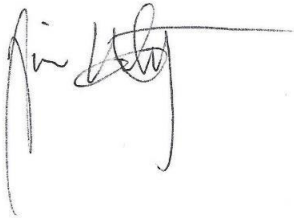
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maintain a natural resource conservation posture that will meet the requirements of our people in perpetuity.

Arizona Sportsmen for Wildlife Conservation respectfully requests inclusion of the eight remedies (additions) to the LMP as detailed in our August 17, 2022, Objection letter, and additional LMP analysis to meet the mandated hard look of landscape scale changed conditions across the forest that include:

- protected and managed wildlife areas;
- critical wildlife improvements and fisheries habitat; and
- soil, water, plant communities, and riparian areas.

We continue to be committed to conserving, restoring, and protecting the unique fish, wildlife, and habitat values of the TNF. We appreciate the opportunity to participate in the objection process and would like to work cooperatively with the TNF staff to address our issues and concerns.

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

Jim Unmacht
Executive Director
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