



February 12, 2018

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 Draft Wilderness Evaluation Map

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 outdoors passions. We have 42 Member and Affiliate organizations representing well over 10,000 individuals, reaching across the spectrum of wildlife conservation, hunting, angling, shooting, youth orientated groups, outdoor recreation groups and businesses from all across Arizona.

While AZSFWC appreciates the opportunity to offer comments on the Tonto National Forest's Draft Wilderness Evaluation Map, we have a number of concerns with the process and direction this matter is moving. Land management planning is one of the most important functions of local governments. Ensuring that federal plans are consistent with local plans and **all** other land management edicts is imperative to our communities and State, particularly in areas with significant amounts of National Forest System (NFS) lands.

As this planning process proceeds, we request that you constantly recognize that the planning rule requires the Agency provide a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contributes to the economic and social sustainability of communities.

**Multiple use and access:**

- We are strong proponents of sustainable multi-use on our Federal lands and waters including those within the Tonto National Forest (TNF).
- We have submitted prior comments over the course of the TNF planning process including in the Preliminary Proposed Plan, Wilderness Recommendation Process and your Wild & Scenic Rivers Eligibility Study.
- Access to the land and waters are some of those critical components that we need to ensure remain in place, because all too frequently by dictum, rule or by some administrative declaration, access becomes restricted.

**AZ Game and Fish Department:**

- 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

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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.

- It is critical that access is assured for the Arizona Game and Fish Department (AZGFD), for both administrative purposes as well as active wildlife management. Too often in the past special land use designations have been an impediment to their statutory responsibilities, and this has been true on the TNF lands in the past.
- This is no more evident than the restrictions on wild sheep management and use of helicopters to manage, monitor and capture animals. These restrictions are having an adverse effect and impact on the bighorn population on the TNF.

#### Special Designations:

- Most sportsmen and women support public land use that provides Arizona's public land resources with a net benefit, but do not support the conversion of public lands or waters from multiple-use to a special use designation 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.
- TNF must adequately establish a purpose and need for special land use allocations and designations as required by Council for Environmental Quality regulations, the National Environmental Policy Act (NEPA), and Forest Service guidelines.
- Federal lands comprise 42% of Arizona's lands, of which more than 43% have special land use designations, with significant restrictions relating to the public's ability to recreate and the Department's ability to fulfill its trust responsibilities for wildlife management. Arizona currently has 4.5 million acres of designated wilderness (600,000 acres on the TNF alone!) and an additional 5.8 million acres of land carrying special land use designations. These 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, like wilderness, can impede access to our public lands, diminish recreational opportunities and 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. Ensure your analysis and the outcomes consider and avoid these impacts to the social and economic stability and environmental integrity of our State. Do this by re-evaluating any recommended special designations such as for Lakes and Rivers Management Areas to safeguard multiple uses of public lands, wildlife related recreation and wildlife management.

#### Private Land:

- Recognize there is very limited private land, with little to no affect on the management of the Tonto National Forest. Respect private property rights for individuals and communities. With the nearly 3 million acres of open land on the Forest, wildlife travel or migration routes are abundant. Consider that designated corridors within already open landscapes across the forest are superfluous.
- Further, the private land within or adjacent to the forest represents a very small percentage across the landscape. With the established open space across the forest, there are no known significant impacts to wildlife movement across the forest from private inholdings or communities. There is ample access and open space surrounding private inholdings and

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communities within or adjacent to the forest, such that individuals wanting access can readily walk around and respect private land rights. Wildlife has well established travel routes around and through those private lands without any significant impediment. Do not impinge upon private property rights to create unnecessary additional public access to forest lands.

#### **Motorized Access:**

- Wildlife can be readily observed or watched across all of the nearly 3 million acres of forest. Established public motorized access should be maintained for this to continue. The TNF should also ensure motorized access is available into wilderness areas with cherry stem roads so the areas involved are accessible to all members of the public.
- Carefully evaluate effects off-highway vehicle (OHV) use with non-motorized users of the Forest, including documentation of the benefits of OHV use for recreational and sporting purposes. Continue to provide designated OHV areas for riding and recognize well managed use of OHVs on established routes, including the safety benefits of OHV use and access for disabled persons.

#### **Species of Conservation Concern:**

- The TNF's obligations in the Master Memorandum of Understanding with AZGFD must be met. Collaboration and communication with AZGFD during the Forest Planning effort is a significant factor in meeting this agreement. AZGFD has considerable data in the State Wildlife Action Plan and Heritage Data Management System (HDMS) on many species, including the Species of Greatest Conservation Need (SGCN) and Species of Economic and Recreational Importance (SERI).
- Pertinent regulation and law requires impacts to all wildlife resources be disclosed in your analysis; including the HDMS, SGCN and SERI species is critical. We also request you ensure these are included in your species of conservation concern in the Forest Plan. Ensure multiple use objectives as defined in pertinent edicts are met as you analyze all relevant information for reasonable alternatives to address impacts, to conservation and mitigation.

#### **Feral Horses:**

- It's ironic that a major portion of your planning process centers on wilderness issues, and you are undertaking an exhaustive, substantive assessment and review of those potential designations. However on the other hand, you have essentially cordoned off a section of the Salt River and will fence in feral horses to accommodate an outspoken public without any public meetings or environmental assessments on what these non-native domestic livestock will do to the riparian habitat.
- We believe it is critical to include in your analysis and discussion with AZGFD, the ecological impacts to native wildlife and fisheries and the riparian and terrestrial resources, as well as the dangers to recreationists from these unmanaged domestic animals. The presence and impact of these horses must be fully analyzed as required by NEPA, rather than ignored because uninformed groups put public pressure on the agency. They should be considered an invasive species in your assessment of the TNF lands.

#### **Evaluation for Wilderness Characteristics:**

- **(Size)** We believe the comment in the Under the Wilderness Characteristic Determination Guide stating "Areas less than 5,000 acres are sufficient size to manage as a wilderness

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based on considerations” should be removed from the assessment. This is a subjective figure that could quite easily create de facto wilderness pockets across the forest.

- **(Apparent Naturalness)** You have set forth criteria for evaluating “apparent naturalness”. This is a subjective inference and we believe the evaluation criteria should be assessed with the best available science and not solely on someone’s opinion on “appearance”.
- Under your Consideration column, it states “Consider the extent to which the following improvements cause the appearance to depart from apparent naturalness in the area as a whole”. The FS Handbook indicates involving minor structural and nonstructural improvements that are not substantially noticeable or if wilderness character can be maintained or restored through appropriate management actions. In addition, it states recreation improvements such as occupancy sites, minor hunting or outfitter camps – areas with minor or easily removable recreation developments may be included. Then, will there be measures like this for roads per square mile, developments per acre, etc?
- **(Outstanding Opportunities for Solitude)** The evaluation criteria should be written in a way that directs the Forest to make evaluations based on measurable criteria, clear definitions and the best available science, rather than written to allow for subjectivity. This is another subjective criteria left up to the individual suggesting it, as well who selects it.
- With nearly one third of the Forest closed to motorized access, there is ample opportunity for primitive forms of recreation. Additional wilderness designations or recommendations will impose unnecessary limitations on wildlife management activities, multiple-use, active habitat restoration, and the ability of the public to access these areas.
- For this reason, we request the TNF provide clear and consistent guidance on what activities would and would not be allowed in the areas identified as having wilderness characteristics or those considered opportunities for solitude.
- **(Unique and Outstanding Qualities)** We would strongly encourage the TNF to coordinate considerations in this criteria with the AZGFD as noted previously.
- Unfortunately this statement, “When evaluating unique and outstanding qualities, consider if the feature is iconic, unique at a regional or national scale, and the extent that the feature defines how people think about and value the area.”, moves the assessment back into the subjective category.
- **(Manageability)** Regarding “Considerations made during evaluation”, we believe the TNF should add the following language: “Consider state jurisdictions or authorities and their ability to carry out those management activities.”

#### Summary:

- Those who live in Arizona and anyone that travels here is amazed at the diverse landscapes, and raw beauty they see across this state. That perspective occurs throughout the TNF too. However with roughly one third of the TNF already designated as wilderness, over 600,000 acres or 21% of TNF and an additional 9% of TNF is designated as roadless, we believe that is enough.
- We appreciate plans change and evolve, but we question why in this planning process is there now a “need” for more wilderness on the landscape?

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- In the process of revising the Forest Plan, isn't the TNF required to identify and evaluate lands that may or may not be suitable for inclusion in the National Wilderness Preservation System (NWPS)?
- Presuming that is the case, why is this evaluation only identifying potentially more land with wilderness characteristics, and not also identifying wilderness lands that no longer have those characteristics, and should potentially be removed from the NWPS? That would sure seem to be a more objective analysis of the TNF.
- While you don't have the authority to designate wilderness, you are assessing wilderness characteristics and potentially recommending additional areas for wilderness consideration.
- "Recommended wilderness", while different from "Designated wilderness", exposes the public to attributes that subtly allow implementation or imposition upon us of the very thing that eliminates access and multi-use. This premise is now on the line with TNF's Wilderness Evaluation Map.
- Your recommendations will also likely have a similar management effect, short of Congressional action, on designating land with wilderness characteristics and thus changing how those lands are managed. Therefore we believe it's important to consider the loss of wildlife resources, related recreational opportunities and lost economic benefits as you evaluate and assess your recommendations.

AZSFWC has assessed your Final Evaluation Map and for the record selects "NO" for every one of the proposed areas being considered in your evaluation as "wilderness".

Thank you.

A handwritten signature in black ink, appearing to read "Jim Unmacht". The signature is stylized and somewhat cursive, with a long horizontal line extending from the top of the first letter.

Jim Unmacht  
Executive Director

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