



January 11, 2018

via email: tontoplan@fs.fed.us

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

Re: Tonto National Forest's Preliminary Proposed Plan, November 2017

We appreciate the opportunity to offer comments on the Tonto National Forest's Preliminary Proposed Land and Resource Management Plan. 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 you move forward in this process, 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.

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.

We are strong proponents of sustainable multi-use on our Federal lands and waters including those within the Tonto National Forest (TNF).

- 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.
- As we commented before in your Wilderness Recommendation Process and your Wild & Scenic Rivers Eligibility Study, there are too many attributes that subtly could allow implementation or imposition upon us the very thing that eliminates access for the public. This same premise holds true now for your Preliminary Proposed Plan (PPP).
- 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 special land use designations have been an impediment to their statutory responsibilities, and this has been true on the Tonto National Forest lands in the past.

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

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.

Special Designations and/or Management Areas and Access:

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, or any riparian area is deemed a "wild or scenic" river. Therefore, consider the loss of wildlife resources, related recreational opportunities and lost economic benefits.

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 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, such as wild and scenic rivers 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.

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 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.

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.

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.

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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.

Please refer to our AZSFWC Resolution on Special Land Use Designations from March 2, 2015.
<http://azsfwc.org/azsfwc-resolution-on-special-land-use-designations-updated/>

Wild and Scenic Rivers:

We support your recognition that existing and future management through the Forest Plan, including that of State and private partners, provides purposeful and effective management for analyzed streams that were eliminated from further study for Wild and Scenic eligibility or had a status change. With this, there is no need to re-evaluate your criteria, relative to the “area of comparison,” nor reconsider the 1993 rivers study, with the existing and planned best management practices that will be supported by the forthcoming Forest Plan.

However, we continue to request you consider future development and other potential changes along the river or stream corridors that would be beneficial to the social and economic stability of local communities and wildlife, of those streams or rivers you have chosen to recommend for Wild and Scenic designation. Ensure in your analysis for the Forest Plan that you clearly evaluated the harms or negative impacts to the landscape, the public, local communities, wildlife, members of Congress and future agency administrators that could occur from Wild and Scenic designation by adding restriction limitations.

In our comment letter specific to your Wild and Scenic Rivers analysis we submitted several critical questions and issues. We incorporate those here by reference and reiterate our desire for you to demonstrate you will continue evaluation of our concerns and issues.

Species of Conservation Concern:

The Forests obligations in the Master Memorandum of Understanding with the Arizona Game and Fish Department must be met. Collaboration and communication with the Department during the Forest Planning effort is a significant factor in meeting this agreement. The Department 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 domestic Horses at Salt River:

As you move forward in addressing the impacts from the feral horses near Salt River, consider they are not “wildlife” or “true wild horses” they are domestic livestock or feral animals run amok. Include in your analysis and discussion with the State, 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 impacts of these horses must be fully analyzed as required by NEPA, rather than ignored because uninformed groups put public pressure on the agency. Or in the alternative, they should be addressed as unauthorized trespass domestic animals and removed according to the Arizona Department of Agriculture policies. The State can offer a horse adoption process and ensure compliance with federal and state edicts regarding these horses, just as is done for all other activities on federal lands.

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Wild and prescribed fires:

Through your fire planning and analysis process ensure you evaluate fire effects based on site specific information. It is critical you have considered the impacts to wildlife, riparian areas, and sensitive ecosystems prior to any fire management ignition. Considering these impacts is also imperative prior to managing a natural ignition for resource benefits. When you design standards or guides in the Forest Plan, authorizing both prescribed and prescribed natural fires, ensure you require full analysis of potential outcomes, including the no action alternative, and require other management applications be considered.

Thank you again for the opportunity to provide our comments and concerns as you move forward in your planning efforts. Please contact us if you have questions.

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

Jim Unmacht
Executive Director