



May 20, 2019

Jessica Richardson
District NEPA Coordinator
Flagstaff Ranger District
Coconino National Forest
5075 N. Highway 89
Flagstaff, AZ 86004

RE: Coconino National Forest Service Road 128A Improvement Project

Ms. Richardson:

On behalf of Arizona Sportsmen for Wildlife Conservation (AZSFWC) we appreciate the opportunity to provide input and comment on your proposed improvement project on Forest Service (FS) Road 128A to the Northern Arizona Shooting Range.

Your District Ranger's April 19, 2019 letter pointing out that the Northern Arizona Shooting Range is experiencing an average of 3,852 user days since 2014 is a key point.

He further states, "This is far more use than what an ML2 road is intended to have, being that it is designed for high clearance vehicles and not for user comfort." In that context, the Arizona Game and Fish Department's (AZGFD) request for the opportunity to provide safer access to the range with the ability to improve FS128A making it accessible to passenger cars is both reasonable and prudent.

The stated goal of this project is to provide a simple road structure of adequate strength to support increases in vehicle traffic, while also providing drainage as necessary to prevent unacceptable environmental damage. AZSFWC agrees with your Proposed Action to meet these objectives by changing the FS128A road classification from ML2 to ML3.

Your objectives would be met by widening the road from 12 feet to 14 feet, controlling runoff with ditch lines and features to enhance crossing drainage, ie; culverts, low water crossings, and possible minor realignment.

The net effect of these modifications would include the following benefits:

1. Ensure safer access into the shooting facility,
2. Stabilize the road base with road surfacing material,
3. Better serve a broader customer base, from passenger cars to travel trailers,
4. Allow the range to remain open during wet seasons,

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5. Help protect habitat along the road during heavy rain events, and
6. Potentially lower the amount of dispersed shooting in the Forest.

AZSFWC would also urge the CNF to reauthorize and extend the road maintenance permit that AZGFD currently has for the maintenance of FS128A. This would allow AZGFD to address the necessary change in maintenance levels from the current ML2 to the proposed ML3 category.

Finally, your preliminary analysis “indicates that there are no extraordinary circumstances to resource conditions as outlined at 36 CFR 220.6(b). Based on this, we anticipate that this project will be categorically excluded using *36 CFR 220.6(e)(3)—Approval, modification, or continuation of minor special uses of National Forest System lands that require less than five contiguous acres of land.*”

AZSFWC supports your analysis and application of the categorical exclusion to proceed with the proposed action.

Thank you for your consideration!



Jim Unmacht
Executive Director

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions.

AZSFWC consists of 41 member, affiliate, and associate groups that reach across the spectrum of hunting, angling, shooting, outdoor recreation and businesses from all across Arizona. Our member groups represent in excess of 10,000 sportsmen and women from Arizona.