



October 17, 2018

Amanda Dodson, Field Manager  
Bureau of Land Management  
Kingman Field Office  
2755 Mission Boulevard  
Kingman, AZ 86401

Re: Kingman Field Office TMP EA and TMIP Drafts

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 passions. We have 42 Member, Affiliate and Associate organizations representing over 10,000 sportsmen and women that reach across the spectrum of hunting, angling, shooting, outdoor recreation groups and businesses from all across Arizona.

We are proponents of sustainable multi-use on all our Federal public lands, including those under the jurisdiction of the Bureau of Land Management (BLM). BLM lands in Arizona provide essential habitat for Arizona's diverse wildlife, but also a myriad of opportunities for public recreation in general, and wildlife dependent recreation in particular.

We understand the BLM currently manages the majority of the Travel Management Areas (TMAs) under the Kingman Resource Management Plan (RMP) and Record of Decision (ROD) 1995. We also understand the intent of this TMP is considered an action plan and will serve to adjust the implementation of the 1995 RMP allocations by shifting from an existing route network to a designated route network. The Draft Environmental Assessment (DEA) identified and evaluated 17,415 existing routes totaling 5,503 miles of proposed designations, including Open, Closed or Limited.

The "Open" category includes routes that would require management actions such as routine maintenance and improvements. The "Closed" category includes those routes that are already naturally reclaiming, redundant, traverse through sensitive

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resources or create a public health and safety issue (ie; excessive erosion, or user conflict). The “Limited” categories are defined as follows:

Limited (Administrative and Authorized Users): Includes motorized uses by BLM, permittee, private property owners and other authorized users.

Limited (Administrative and Seasonal): This category includes emergency administrative use, seasonal motorized use, temporary motorized use, administrative and permittee motorized use and temporary closure to public use.

Limited (Non-motorized): Routes designated as limited to non-motorized use.

Limited (Off Highway Vehicle – OHV Width): Routes designated as limited to four-wheel drive (4WD) modified and high clearance vehicles, all-terrain (ATV) use, and/or motorcycle use by the public.

AZSFWC knows and appreciates the fact that the BLM has worked cooperatively with the Arizona Game & Fish Department (AZGFD) for many years and on many fronts. It is critical that the trust responsibility the AZGFD has regarding Arizona’s diverse wildlife is considered and respected in the TMP and EA assessments. All too often we have seen management by restriction become a norm in the planning process with some of the Federal land management agencies. This causes us some serious concern, so we are pleased to see the BLM is working with AZGFD on these planning efforts.

AZSWFC also appreciates the challenges the BLM Kingman Field Office must deal with in reaching a fair and appropriate balance between public motorized travel, resource and wildlife protection and non-motorized uses of BLM lands. We support your continued collaborative efforts with AZGFD to make sure their statutory responsibilities are considered and respected in the planning process.

AZSFWC was pleased to see the AZGFD found your route evaluation process to be efficient and well organized. This is important to Arizona sportsmen and women since the AZGFD plays a critical role in protecting our passions with the state’s wildlife, recreation and access to same.

We’ve been advised the AZGFD found your Proposed Action Alternative C best addresses wildlife resource conservation and public safety needs while providing for both motorized and non-motorized user access to federal lands. AZSFWC also supports that alternative.

That said, we also have some of the same concerns AZGFD has on the following issues:

1. Route signage for closed roads
2. Motorized Big Game Retrieval/Prohibition against cross-country travel

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3. Dispersed camping 100" off the centerline of road
4. OHV Route Restrictions of 50" in width
5. Inventoried Lands with Wilderness Characteristics

AZSFWC suggests the following relative to the concerns expressed above.

#### Signage and Closures

AZSFWC has advocated for consistent signage across all lands managed by Federal land management agencies in Arizona. This is of particular concern because of the inconsistency between BLM land and the six U.S. forests that are in our state. Clear and uniform signage is important for the user and should include numbered open roads, and closed roads with no numbers or signed as closed. Numbered signage for only open roads would also be a benefit for law enforcement when dealing with potential violations on closed roads.

#### Motorized Big Game Retrieval/Prohibition against cross-country travel

Public hunting is the most important and effective tool for managing large herbivore populations (including elk, deer, and bear). The ability to use motorized vehicles to retrieve downed big game is essential not only for the efficacy of the population management tool, but also helps maintain appropriate wildlife recreational opportunities.

Even with abled hunters, the sheer size of these animals does not always lend themselves to packing out without motorized assistance. In addition, we would advocate for including an allowance in Alternative C for CHAMP (Challenged Hunter Access Mobility Permit) hunters to utilize motorized big game retrieval for all legally taken big game species.

AZSFWC concurs with the AZGFD outline:

- Allow MBGR of all big game within 1 mile of designated open roads during designated hunting seasons and for 24 hours after the close of the season.
- Allow one trip in and one trip out utilizing the most direct route.
- Restrict access during wet/muddy conditions or across wetland/riparian areas.
- Allow CHAMP hunters to make use of a motorized vehicle within a specified distance of routes designated as open to retrieve legally taken big game animals.

#### Dispersed Camping 100' from road centerline

AZSFWC recognizes the need to manage dispersed camping in order to minimize possible natural resource damage, but we also know the essential role camping plays on the ability for the public to enjoy and recreate within BLM lands. If the public's ability to use dispersed camping is unnecessarily limited, it will have a negative impact on those lawful public land users that want to hunt, fish and recreate.

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This is another area of inconsistency across Federal lands in Arizona. AZSFWC desires some consistency for the public when it comes to dispersed camping, be it on BLM land or Forest Service land. We believe the BLM should adopt a 300 foot width from the edge of the road for all dispersed camping corridors. This would eliminate and avoid public confusion and simplify the public's understanding on the issue across all federally managed lands in the state.

#### OHV Width 50 inches

We understand that the TMP EA has identified only a few routes for potential limitations as compared to the total number of routes identified, but absent any sound science and affirmative analysis, we don't believe these routes should be unnecessarily restricted because of a presumption of harm. We encourage the BLM to continue to work with the local OHV clubs to reach satisfactory remedies to these concerns.

#### Management of Lands with Wilderness Characteristics (LWC)

For some time now AZSFWC has been concerned with Federal land management agencies managing certain portions of their lands by restriction. With only 23% of Arizona land free of some sort of special land use designation, this is a serious concern. When the topic of "Lands with Wilderness Characteristics" (LWC) arises, so does access limitations to sportsmen and women, as well as red tape for wildlife management responsibilities and habitat conservation efforts by AZGFD.

Any time "wilderness" comes up in a conversation, most thoughts go to Congressionally designated "wilderness", however when the BLM segues to LWC, by fiat, free of Congressional action, many of those same 'rules' come into play. As AZGFD stated in their September 18, 2018 letter to you;

"No matter how carefully wilderness designation language is crafted, a wilderness designation inevitably hampers or precludes the Department from achieving its management objectives in such areas, resulting in substantive and costly compliance hurdles that must be addressed before wildlife management actions can be implemented in such areas."

If the inclusion of LWC is mandated in your TMP, we would urge the BLM to specifically address the AZGFD concerns relative to their statutory responsibilities to manage our wildlife. We would also urge you to minimize any impact on the multiple use opportunities for the public, including any wildlife related recreation.

We believe our Federal public lands should remain under control of the respective Federal agencies. However, we would implore you to seek ways to insure access to those lands is not only encouraged, but expanded; not diminished or reduced by an LWC designation!

To that end, AZSFWC and the 16 member groups listed in the attachment fully support the AZGFD comments on this plan and we are incorporating their

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September 18, 2018 letter into our comments. For the record, attached is a copy of their letter.

Thank you.

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

Jim Unmacht  
Executive Director

CC: Ty Gray, AZGFD Director  
Jim deVos, AZGFD Assistant Director, Wildlife Management Division  
Clay Crowder, AZGFD Chief, Habitat, Evaluation and Lands Branch  
Larry Phoenix, AZGFD Regional Supervisor, Kingman Office  
Dee Kephart, AZGFD Program Manager, Habitat, Evaluation and Lands

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**AZSFWC Member Organizations Supporting AZGFD  
Recommendations on the Kingman TMP and TMIP EA**

Anglers United  
AZ Big Game Super Raffle  
AZ Bowhunters Association  
AZ Chapter National Wild Turkey Federation  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Houndsmen  
AZ Outdoor Sports Inc  
AZ Shooting Sports Education Foundation  
AZ State Council Trout Unlimited  
AZ Taxidermy Association  
Coconino Sportsmen  
Mohave Sportsman Club  
Outdoor Experience 4 All  
Xtreme Predator Callers  
1.2.3.Go...

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