



February 9, 2022

The Honorable Senator Mark Kelly  
B40B Dirksen Senate Office Building  
Washington, DC 20510

**Re: Ensuring the safety of thousands of recreationists; private land access; permitted grazing access; social and economic stability of rural communities; and efficient county, state, and federally mandated management specific to continued motorized public access on Forest Roads 203 and 487 in the Tonto National Forest, Arizona.**

Dear Senator Kelly:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, youth orientated groups, outdoor recreation groups and businesses from across Arizona, representing more than 16,000 people.

We respectfully request your help through legislation to correct the errors and omissions created within several official federal documents and maps with contradictory information regarding the boundary of the Sierra Ancha *Wilderness* (formerly the Sierra Ancha *Wild Area*). The boundary discrepancies are specific to two areas that include Forest Roads 203 and 487, well-established motorized public access roads along the eastern and western boundary.

It is important to note the Sierra Ancha *Wilderness* was designated via the 1964 Wilderness Act, but on account of the pre-existing Sierra Ancha *Wild Area*. The Act directed those land areas already designated by the Chief of the Forest Service as a "*Wild Area*" shall become a "*Wilderness Area*."

Prior to the Act, the Senate Congressional Record, page 9775, June 7, 1956, and page 18083, September 5, 1961, are two of many federal documents that demonstrate the Sierra Ancha *Wild Area*, as documented in a 1951 map, is an official designation (not a mapped area used as a 'working document', as has been incorrectly stated in prior federal correspondence).

AZSFWC letter to Senator Kelly on Legislative Remedy for Tonto NF Roads 203 and 487 – 2-9-22

Arizona Sportsmen for Wildlife Conservation  
PO Box 75731 New River, AZ 85087

Working with the Congressional Research Service within the past six years, it was discovered that little to no records were found; such as maps or the letter that was required from the USDA Forest Service in 1965, the year after the Wilderness Act, which was to provide a map and legal description of the "Wild Areas" to become "Wilderness."

During this time, Senator Flake's staff requested a copy of the 1965 letter and associated map. Region 3 USDA Regional Forester Cal Joyner provided the documents in a letter dated Feb. 2, 2017. In Joyner's 2017 letter, the map he included with the requested 1965 letter did not provide full disclosure of the established motorized roads (Forest Road 203 and 487). Further, the legal description of the Sierra Ancha Wilderness is severely inconsistent with the submitted map, as well as the established prior Sierra Ancha Wild Area.

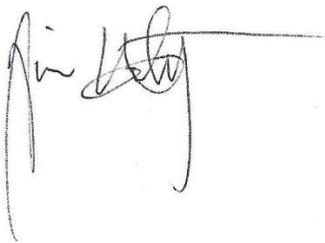
Since 2017, we have researched and secured records and documents to support our rationale and request for legislation to correctly define the boundaries of the Sierra Ancha Wilderness boundaries that, based on the Act, should have mirrored the 1951 "Wild Area" map, and the intent of the cartographer who intentionally pulled the boundary away from the established motorized public access roads (Forest Roads 203 and 487).

We have included with this letter select records for your review to assist you in moving forward on this critical issue.

On behalf of AZSFWC, the 41 organizations and business supporters (see the following list), and many concerned citizens who have volunteered their time addressing this problem, we would like to meet with you at your earliest convenience to discuss this legislative effort in more detail and answer any questions you might have.

Thank you for your consideration and your anticipated reply.

Yours in Conservation,

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

Jim Unmacht  
Executive Director

Attachments

AZSFWC letter to Senator Kelly on Legislative Remedy for Tonto NF Roads 203 and 487 – 2-9-22

Arizona Sportsmen for Wildlife Conservation  
PO Box 75731 New River, AZ 85087

**Coalition of Organizations and Businesses Supporting  
Tonto NF Sierra Ancha Wilderness Access Legislation**

AZ Sportsmen for Wildlife Conservation  
Anglers United  
AZ Antelope Foundation  
AZ Bass Nation  
AZ Big Game Super Raffle  
AZ Bowhunters Association  
AZ Chapter of Back Country Hunters & Anglers  
AZ Chapter of National Wild Turkey Federation  
AZ Chapter of Safari Club International  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Elk Society  
AZ Flycasters Club  
AZ Houndsmen  
AZ Outdoor Adventures  
AZ Outdoor Sports  
AZ Predator Callers  
AZ State Council of Trout Unlimited  
AZ Taxidermy Association  
Ben Avery Clay Busters  
Christian Hunters of America  
Conserve and Protect AZ  
FirstStrategic, LLC  
Gila County Cattlegrowers Association  
Kahuna's Kids  
Mogollon Sporting Association  
Mohave Sportsman Club  
Mule Deer Foundation  
Outdoor Experience 4 All  
Rim Country Custom Rods  
SolidMen Hunt Club  
Southern AZ Quail Forever  
Southwest Wildlife Foundation  
Sportsmen's Business Alliance  
SRT Outdoors  
The BASS Federation AZ  
Theodore Roosevelt Conservation Partnership  
Valley of the Sun Quail Forever  
Wounded Warrior Outdoors  
Yuma Valley Rod and Gun Club  
1.2.3.Go...

AZSFWC letter to Senator Kelly on Legislative Remedy for Tonto NF Roads 203 and 487 – 2-9-22

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PO Box 75731 New River, AZ 85087

**List of supporting documents and records  
Annotated  
February 9, 2022**

**Request for consideration of legislation to ensure appropriate safe public motorized access to a national Wilderness Area to meet the intent of the Wilderness Act**

**Correction of errors and omissions in official federal documents and maps  
of the boundary of the Sierra Ancha *Wilderness* (formerly the Sierra Ancha *Wild Area*)  
Specific to two areas that include Forest Roads 203 and 487  
Tonto National Forest, Gila County, Arizona**

**The following documents are available electronically.**

- 1) Honorable Congressman Gosar and Secretary Purdue.pdf**  
March 16, 2018, letter from Arizona Sportsman for Wildlife Conservation, Executive Director, Jim Unmacht and Larry and Carolyn Eppler of Action Analysis, LLC to Congressman Paul Gosar and Secretary Sonny Purdue. Contains details and supporting information regarding the critical need for continued public motorized access for the entire length of Forest Roads 203 and 487. Includes several maps. 17 pages (Note: this document is listed first for your review as it provides a significant overview of the issues and supporting maps and records).
- 2) PerddueReply5-18-mailed5-21-2018hilites.pdf**  
Letter reply from Secretary of Agriculture Sonny Perdue to Mr. and Mrs. Eppler co-signed by Jim Unmacht. Carolyn Eppler provided comments and notes within this letter to explain the flaws in the letter based on pertinent research and documentation the volunteer group evaluated. It is presumed Perdue's letter is written by a staff with limited knowledge of the issue details. 2 pages.
- 3) Sierra Ancha Wild Area\_1941\_amended-2-13-1951.pdf**  
Map. Scanned copy of the original official 1951 Sierra Ancha Wild Area Map. This map demonstrates the intent of the cartographer to pull the Wild Area boundary away from the established travel routes. Reference more detailed maps in the letter at 1).
- 4) 1937 Sierra Ancha Mountains-RouteAlongCherryCrk.jpg**  
Map. Accessed from the Arizona memory project. [Azmemory.azlibrary.gov](http://Azmemory.azlibrary.gov)  
Demonstrates the presence of the Route along the eastern side of the Sierra Ancha Wilderness (SAW) where the now named Forest Road 203 travels. Also shows the presence of several private land inholdings that use the road for access.
- 5) 1937mapAx.jpg**  
Map. Closeup section of the 1937 map referenced in 3) above. Accessed from the Arizona memory project. [Azmemory.azlibrary.gov](http://Azmemory.azlibrary.gov)  
Demonstrates the presence of the Route along the eastern side of the SAW (highlighted in yellow) where the now named Forest Road 203 travels.

**6) 1937mapBx.jpg**

Map. Closeup section of the 1937 map referenced in 3) above. Accessed from the Arizona memory project. [Azmemory.azlibrary.gov](http://azmemory.azlibrary.gov)

Demonstrates the presence of the Route along the eastern side of the SAW (highlighted in yellow) where the now named Forest Road 203 travels.

**7) 1937mapCx.jpg**

Map. Closeup section of the 1937 map referenced in 3) above. Accessed from the Arizona memory project. [Azmemory.azlibrary.gov](http://azmemory.azlibrary.gov)

Demonstrates the presence of the Route as it travels south of the SAW to State Highway 288 (highlighted in yellow) where the now named Forest Road 203 travels.

**8) SAW Forest Allotments.jpg**

Map. Active Grazing Allotments adjacent to the SAW.

**9) xxSAW-487rd-2W – Copy.jpg**

Map. Created as a part of the closeup maps for field tours of the SAW. Close-up of the section of Forest Road 487 that meanders into the SAW wilderness boundary (based on the current federal maps that have inaccuracies and omissions).

**10) SAW-map-JuniperFire\_203-288Roads\_2016\_05\_26.pdf**

Map. May 24, 2016, map of the planning area for the Juniper Fire that burned up thousands of acres in the SAW. It also burned up Mr. Nathan Ellison's cattle due to inappropriate management and communication with local families when the Forest Service made the decision to create a landscape scale burn of the area. The map is significant as it demonstrates the critical need of the entire length Forest Road 203 where it exits State Highway 288 and travels up to the eastern side of the wilderness to the north and back to 288. This particular need is for necessary administrative access to manage fires. One of many significant issues.

**11) Letter to Flake-SAW-roads.pdf**

October 12, 2016, Letter to Senator Jeff Flake from two families with private lands requiring access from Forest Road 203; Nathan Edward Ellison of the historic Ellison Ranches and Center Mountain Allotment, and John L. Johnson of the Historic Flying H and Flying V and H Allotments. These two families also have grazing allotments that would be affected by the planned decommissioning of the 10.05-mile section of Forest Road 203. Substantive issues are summarized in this letter specific to the Environmental Impact Statement for the Tonto National Forest Travel Management Plan. Also, a request for legislation to either create a motorized corridor or change the wilderness boundary to allow Forest Road 203 to remain open and to be maintained. Three maps included. 9 pages.

**12) 1.18.2017 Flake letter to USFS Region III re Tonto NF TMP (with enclosur.pdf**

Letter from Senator Jeff Flake to Region 3 Regional Forester Cal Joyner. This letter brings attention to map discrepancies for the SAW. Enclosures include several maps, memos from the Congressional Research Service, the wilderness legal description and boundary map. January 18, 2017. 17 pages.

- 13) B-Talking Points for our meeting in September with Forest Service Chief Tooke-x.pdf**  
September 19, 2017, draft talking points provided to voluntary collaborative group to assist in meeting with Forest Service Chief Tony Tooke. Addresses: Areas of concern regarding motorized public access (review of specific authorities under 36 CFR 251 in place at time of wilderness designation, review of authorities under 36 CFR 293, review of authorities under 36 CFR 261, review of Forest Service Handbook 1909.12, Chapter 70 (73 analysis), and review of the 1964 Wilderness Act); and a General Description of SAW area. Includes two maps. 9 pages.
- 14) Letter – Sierra Ancha Wilderness.pdf**  
December 11, 2017, letter from Senator Jeff Flake to Tony Tooke, Chief, USDA Forest Service. The letter documents significant concerns regarding potential decommissioning portions of Forest Roads 203 and 487. Also included, a congressional analysis of the 1965 legal description provided by the Region 3 Regional Forester of the SAW boundary. This analysis displays various errors and omissions. Also, Senator Flake provides seven close-up map sections of the SAW boundary in a newer digitized format to demonstrate the errors and omissions as found in the 1965 legal description and map. 11 pages.
- 15) SAW-otherSMAs.pdf**  
Map with description of the SAW relative to surrounding federally managed lands less than 10 miles away as the crow flies. Maps shows several parcels of private property inholdings, rural communities, the Fort Apache Indian Reservation to the east, the Salome Wilderness to the west, where the Sierra Ancha Experimental Forest adjoins the SAW, and the Salt River Canyon Wilderness. This demonstrates tens of thousands of acres with limited to no public motorized access. Nearby communities of Young/Pleasant Valley and the town of Globe are directly affected communities by any activities related to the SAW. There is limited public motorized access across the area displayed.
- 16) County Profile for Gila County.pdf**  
County Profile for Gila County. Accessed in 2017 when the volunteer group began addressing issues and researching supporting documentation. 3 pages.
- 17) Brief-SAW-203-487\_Rds\_Voyles\_Eppler\_10-30x.pdf**  
Summary regarding the efforts by a volunteer collaborative group in Arizona to address the issues of two historically important travel routes, Forest Roads 203 and 487. Tonto National Forest, Gila County, Arizona. Problem statement. Purpose of collaborative group. Background. Significant Issues identified. Local effort ongoing. Group participants (Core, Executive, Advisory). 4 pages.
- 18) CCR Draft Legislation July 2020.pdf**  
Draft legal text provided by the Arizona Game and Fish Department for the SAW area to address Forest Roads 203 and 487. Also includes text to address a small section of the Mazatzal Wilderness area. 3 pages.

**19) sierraAncha\_7-13Update.pdf**

Map. One informal alternative for adjustments shown on a map created by the Arizona Game and Fish Department based on conversation with the Arizona Wilderness Society (AWS) and the volunteer collaborative group. The addition of a potential National Conservation Area (NCA) was suggested by AWS; however, procedural, administrative, and other issues make this land change unfeasible.

This same map shows areas 1, 2, and 3 highlighted in red, of acreage selected by the volunteer collaborative group with wilderness characteristics that parallel the existing wilderness. The acreage at 1, 2, and 3 may be used to increase the acreage to more than compensate for boundary adjustments to address the issues surrounding Forest Roads 203 and 487 where they meander inside the edge of the boundary. The area highlighted in red at 4 delineates a small length of the 487 road that meanders inside the edge of the wilderness boundary (based on the currently used maps that are inconsistent and with errors and omissions). The red line below the acreage at 1, represents 10.05 miles of Forest Road 203 along the eastern boundary of the wilderness where the motorized public road meanders in and out of the edge of the boundary due to topographic features. It is important to note there are several surrounding roads that may be decommissioned by the Tonto National Forest through their Travel Management Plan. Forest Road 203 is the only continuous road that connects to State Highway 288 on the west side of the wilderness that provides access to the east side of the wilderness. It travels for approximately 20 miles through private lands south of the wilderness, then turns north past more private lands and up along the eastern edge of the wilderness then north of the boundary the road heads back to State Highway 288 (above acreage 1).

**20) TWS SAW Proposal – 10-2020.pdf**

Map. The Arizona Wilderness Society earlier informal alternative to add significant acres, nearly doubling the Wilderness size and adding a Conservation Special Management Area. The Tonto National Forest, Gila County Supervisors, and residents do not support this large expansion as suggested by the Arizona Wilderness Society. There is long-established infrastructure in the proposed areas of expansion, including established mining claims by the UEC. The lands east of the SAW are not commonly found to have wilderness characteristics selected by the Forest for this area. Please see other map at #19: The volunteer collaborative did an initial evaluation of the areas along the perimeter of the wilderness and created a map showing three potential areas on the west side to expand the existing wilderness boundary in locations that have significant wilderness characteristics.

**21) 203\_487-RD-estimatedRoadlayers-SET-Axx.pdf**

Draft working document of the estimated road layers for Forest Roads 203 and 487 along the SAW boundary with included notes. 17 pages.

**22) Mr. LeeStatementWildernessLandGrabUtahCREC-2019-02-11-pt1-PgS1155.pdf**

Senate. Congressional Record. February 11, 2019. S1155-S1161. Highlighted sections of this congressional record, noting Utah Senator Mike Lee's concerns regarding a massive public lands package. Includes discussion about wilderness areas. 7 pages.

**23) TNF TMP ROD comments-draft 7-12-2016.docx**

Draft July 13, 2016, comment letter from the Theodore Roosevelt Conservation Partnership to Calvin Joyner, Region 3, Regional Forester regarding the Tonto National Forest's June 2016 draft ROD and FEIS for Travel Management. 2 pages.

**24) Tonto National Forest Planning Efforts.pdf**

Power Point summary of planning efforts, public comment, for the Tonto National Forest. 14 pages.

**25) Photographs (15) from field tours of the Sierra Ancha Wilderness.**

Photographs. May, June, and July of 2017 three field tours of the wilderness were completed including one to show Senator Flake’s Staff the areas of concern on Forest Roads 203 and 487 along the boundary of the SAW. Represented/participants at the tours: Senator Flake (Chuck Podolak and Buchanan Davis), Tonto National Forest (Chris Welker, Recreation Staff), Arizona Game and Fish Department (Jay Cook, Natalie Robb, David Fernandez, Ed Sanchez), Gila County Supervisors (Tim Humphrey, Woody Cline), Gila County Sheriff (Adam Shepherd), Gila County Search and Rescue and Deputy (Johnny Holmes), Arizona Sportsmen for Wildlife Conservation (Jim Unmacht and Pete Cimellaro – Yellowhorn Outfitters), the Flying V and H Ranch (John and Leslie Johnson and Rangler Huckleby), the Ellison Ranch (Nathan and Alfred Ellison), The Wilderness Society (Mike Quigley and Scott Miller), Action Analysis consulting research and facilitation (Larry and Carolyn Eppler), retired flight rescue nurse of the town of Young (Carol Clark), retired Fire Management Officer USDA Forest Service of the town of Globe (Robert Shirkey).

4-13-2017-FieldTour-203Road-SenFlake-Podolak-Davis-Holmes.jpg	4-13-2017-FieldTour-203Road-Group.jpg	4-13-2017-FieldTour-203Road.jpg
4-13-2017-FieldTour-GoldCrkCrossing.jpg	5-24-2017-487Road belowSAW.jpg	5-24-2017-MurphyRanch.jpg
5-24-2017-487RoadEntrance below Elks YouthCamp.jpg	5-24-2017-487RoadnearSectionofConcern.jpg	5-24-2017-WorkmanCrk-alongside487Road.jpg
6-12-2017-GroupTour487RoadAztecLookoutb.jpg	6-12-2017-GroupTour487Road.jpg	6-12-2017-GroupTour487RoadAztecLookout.jpg
6-13-2017-GroupTour203Road.jpg	6-13-2017_GroupTour203Roadb.jpg	6-13-2017-AztecPeakLookout (1).jpg

**26) corridor\_alternatives\_03\_05.pdf**

Sample legislative language for Trail Access and Corridors, model language (2005). 2 pages.

**27) AzWilderness.pdf**

Arizona Wilderness checklist, courtesy Wilderness.net. Demonstrates the significant amount of Wilderness acres in the state of Arizona. As of this printing, 4,528,913 acres across 90 Arizona Wilderness areas. 4 pages.

**28) FedLandOwnershipCRS.pdf**

Congressional Research Service report of Federal Land Ownership: Constitutional Authority and the History of Acquisition, Disposal, and Retention. December 3, 2007. 17 pages.

**29) LandAreasNFS\_LAR2011\_Book\_A5.pdf**

Land Areas of the National Forest System. USDA Forest Service. WO, Lands. FS-383. January 2012. 265 pages.

**30) SAW-USGS-report.pdf**

Undated summary report by the Department of Interior, US Geological Survey of Mineral resources of the SAW and Salome Study area, Gila County, Arizona. Includes a map showing the wilderness and contiguous areas. 6 pages.

**31) Gmail - 203\_487\_Powerline Roads legislation effort, supporting information.pdf**

Email to representatives at the Arizona Game and Fish Department that assisted the volunteer group. Valuable information to assist in the legislative effort. Public Law 96-560, 12/22/1980 94 Stat. 3271 is referenced. Public Law 107-334, 12/16/2002 is referenced. S1170 Congressional Senate Record, 2/11/2019 is referenced. 3 pages.

**32) Gmail - Considerations - SAW proposed NCA and existing Wilderness considerations.pdf**

Email to primary working group of the volunteer group. References important edicts and statements. Affidavit of Correction. BLM Manual, laws, and proclamations regarding National Conservation Areas. Forest Service laws regarding accessibility to Wilderness Areas and affected rural communities. Congressional Research Service references. Errors corrected in the Constitution referenced. Case law. Regulations referenced. Bill text examples of land exchanges or conveyance. 5 pages.

**33) StephenMatherWildernessBoundaryAdjust-BILLS-113hr1156rh.pdf**

113<sup>th</sup> Congress, 1<sup>st</sup> session. H.R. 1156 bill to adjust the boundary of the Stephen Mather Wilderness and North Cascades National Park in order to allow rebuilding of a road and ensure no net loss of acreage. 6 pages

**34) SierraAnchaWilderness-203Rd\_487RdPublicAccess.pdf**

Photo documentation of some of the volunteer group and Senator Flakes staff on a field tour of Forest Roads 203 and 487 along the Sierra Ancha Wilderness. Provides photo documentation of the roads and the landscape conditions. 15 pages

**35) Wilderness or Primitive Area allowable activities-EpplerSummary.pdf**

Summary of Wilderness or Primitive area allowable activities as per USDA Forest Service directives and regulations and laws. 9 pages

**36) CRS\_FedLandDesignationsBriefGuide-R45340.pdf**

Congressional Research Service guide to various land designations. 18 pages

**37) BLMpolicymanual6220.pdf**

Bureau of Land Management policy manual 6220 for National Monuments, National Conservation Areas, and similar designations. 23 pages.