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Comments on Coconino National Forest Draft Forest Plan and EIS

When the last Forest Plan was developed there was no expectation that it would be 27 years before it was revised as a whole. The amendment process made some changes, but it was anticipated that within 10-15 years there would be a revised plan. My observations are that in the intervening time span the staff of the Coconino have not been stuck in a time warp of 1987. As new resource information, technology and policy developed these were implemented, mostly because of being allowed by the old plan (not in contradiction to it), and in a few cases requiring an amendment. However, there is no doubt that a revised plan with new public involvement was certainly overdue. The proposed plan and draft EIS reflect an enormous investment of time and resources. My response is limited to just a few items.

As I stated in response to the DEIS for the Travel Management Plan (TMP) a few years ago, it is indeed unfortunate that Travel Management was not an integrated part of the Forest Plan and DEIS.

Recognizing that it was perhaps more urgently pushed in order to implement sooner, incorporating a revision (if necessary) of the TMP would have provided another opportunity for the public to respond, considering the entire situation as it would affect them – and very possibly a faster response to public concerns after implementation began. At previous public meetings (e.g., Cornville Community Association in springs of 2012 and 2013) representatives of the Coconino National Forest made presentations and statements that were interpreted by members of the audience to mean that changes could be made based on public input as the plan was implemented, **and** that a new map would be issued each year. The implication was that changes could be implemented each year. They **did not say** that actual changes to the travel management rules could not be made without a new NEPA analysis and document (I learned this through an email response from Mike Dechter, in which he acknowledged the need for additional areas for dispersed camping in the pinyon-juniper woodland north of the San Francisco Peaks. However, he said that the NEPA for change would not start before 2014.)

Having been a recreational user of the Coconino National Forest for 40+ years – wood cutting, hunting, various forms of dispersed recreation – I am acutely aware of the exponential increase in public use and accompanying impacts on the land and its physical and biological resources. I am also aware of the continually constrained budgets compared to use and to the ever increasing conflicting demands by a myriad of users and user groups. However, the combination of the Travel Management Plan and this proposal have a cumulative effect that tends to impact motorized recreational users disproportionately to non-motorized. The term “under represented” is used to support recommendation for designation of specific areas as wilderness. However, my experience is that it now applies to opportunities for dispersed camping with a vehicle, due to the vast majority of Forest roads left open for travel but closed to camping. This results in reducing the opportunities for dispersion and relative degrees of solitude, even outside of weekends and peak periods. The soil and water specialist’s report for that DEIS stated that there is very little damage from dispersed camping not located in or immediately adjacent to riparian areas and wetlands, but rather from indiscriminate ATV use emanating from the camps. This is an education and enforcement issue and the large majority of recreationists should not be punished because of the inappropriate actions of a minority.

Of the action items analyzed, I would recommend against adoption of the wilderness recommendations of Alternative C. In the Plan Proposal, Alternative B, three new areas are recommended for congressional wilderness designation – additions to the Strawberry Crater and Fossil Creek Wildernesses and a new Walker Mountain wilderness. I am not fully familiar with the first two; however, I believe that designation of the Walker Mountain area as a wilderness is not needed in order to continue to provide recreational settings that satisfy much of the primitive area demand. The background reports indicate that there are existing developed livestock waters and a need for some vegetation management. In the 2013 updated Wilderness Need Evaluation the only variable factor (i.e., the only one in which not all potential areas were rated high simply because of expected wilderness demand) was in underrepresented ecosystems due to 1715 acres of interior chaparral. I believe that if the percentage of interior chaparral within wilderness in its actual geographical range were calculated it would certainly be more than 3 percent. On the Coconino National Forest consider its presence in the Sycamore Canyon, Red Rock-Secret Mountain, Munds Mountain wildernesses. There are many thousands of acres of interior chaparral within wildernesses on the Tonto and Prescott National Forests. Comparing to the Southwest region wilderness land base which includes the Pecos Wilderness, Wheeler Peak Wilderness, Gila Wilderness, et al is unrealistic.

The background reports do not identify any threats to the area that can only be alleviated by wilderness designation. I would recommend to continue to manage the area carefully to continue opportunities for the current type of recreation, but maintaining the options for vegetative management and mechanized maintenance of existing improvements.

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