



July 23, 2018

CJ Woodard, SCRD, District Ranger  
Coronado National Forest  
ATTN: OBJECTIONS  
5700 N. Sabino Canyon Road  
Tucson, AZ 85750

Electronic Submission via email: [objections-southwestern-coronado@fs.fed.us](mailto:objections-southwestern-coronado@fs.fed.us) Subject: "Santa Catalina Ranger District Travel Management System."

**RE: Notice of objection filed pursuant to Project Level Objection Process, 36 CFR 218.8 (A) (B) (D): Failure to comply with National Environmental Policy Act requirements to evaluate the environmental impacts to the Arizona Game and Fish Department and the public and to discuss possible conflicts with Arizona Game and Fish Department objectives in its plans and policies resulting from the Environmental Assessment (EA), draft Decision Notice (DN), and Finding of No Significant Impact (FONSI).**

Objector's Name and Address:

The Arizona Game and Fish Department  
5000 West Carefree Highway  
Phoenix, AZ 85086-5000  
623-942-3000

Dear Mr. Woodard:

The Arizona Game and Fish Department (Department) appreciates the opportunity to work with the Santa Catalina Ranger District (SCRD) of the Coronado National Forest (Forest) beginning with our work in 2007 commenting on the Transportation Analysis Plan (TAP), continuing with our close work looking route by route and providing written comments in 2009, 2010, 2012, and 2014 as well as meeting with the SCRD in 2014 to review our concerns prior to the release of the draft EA. The Department were also active participants on the Collaborative Alternative Team (CAT) and provided input on each district through that participation. Throughout this process the Department has carried forward our concerns, many of which were first raised during the initial TAP process with the vast majority resolved along the way but with several yet unresolved, inadequately addressed, fully disclosed, and/or analyzed, prompting the need for this objection to the EA and draft DN and FONSI.

Mr. CJ Woodard

July 23, 2018

2

The Department requests a meeting with the reviewing officer to discuss our objection. However, the Department is more than willing to meet with staff beforehand to clarify, or resolve any issues that can be resolved.

The Department has presented detailed information during our close coordination with the Forest Service and District, meeting with staff and participating on the CAT. Of primary concern to the Department are the effects of the changes to motorized travel on the ability of hunters to access the Forest to participate in regulated hunting, an activity fundamental to a significant segment of Arizona's population, and integral to the Department's ability to manage wildlife. Executive Order 13443 requires federal agencies to seek the advice of state wildlife agencies, evaluate the effect of federal actions on hunting participation, and implement actions that enhance hunting opportunity. Both the Multiple-Use Sustained-Yield Act of 1960 and the Federal Land and Policy Management Act of 1976 restrict federal land management agencies from negatively affecting the State's jurisdiction and responsibilities.

The Department's robust Landowner Relations Program actively works to enhance public access to public lands for outdoor recreationists of all types. The Department has previously, and will continue, to collaborate with the SCRD to facilitate solutions to access problems, and to work with private landowners and the Forest Service to acquire easements and agreements that enhance public access. These types of access agreements are a substantial investment by the State to ensure public access to wildlife resources as well as public lands which must be safeguarded.

The Department's objection covers issues previously submitted throughout the development of the EA (including planning preceding the current NEPA process) but specifically referencing issues described in our letter of August 15, 2014, which brought forward any continuing unresolved issues and outlined the Department's statewide stance on motorized big game retrieval and travel management (see attached correspondence).

The Department has consistently requested allowing motorized big game retrieval (MBGR) as a specifically authorized use using the following language:

"Big game retrieval is allowed for legally taken and tagged elk, mule deer, bear, and bison during an open season as designated for those species by the Arizona Game and Fish Commission and for twenty-four hours following the end of each season provided it can be done without unlawful resource damage."

## **MOTORIZED BIG GAME RETRIEVAL (MBGR)**

### **Prior Specific AGFD Comments from August 15, 2014 letter:**

Motorized big game retrieval be allowed on all Arizona Forests for legally taken and tagged elk, deer, bear, pronghorn, and bison during an open season for those species and for twenty-four hours following the end of each season provided it can be done without unreasonable resource damage.

**SCRD Response:**

Mr. CJ Woodard

July 23, 2018

3

Bullet 2 : "In response to this comment the following language has been added to the Final EA in the Introduction of Chapter One, "In the state of Arizona, motorized big game retrieval (MBGR) largely pertains to elk, and the National Forests in Arizona that identify corridors for MBGR do so for elk only. In an effort to maintain consistency in Travel Management regulations across the state, and since there are no elk on the Santa Catalina Ranger District, MBGR corridors are not proposed as part of the Proposed Action [under] any alternative. Furthermore, scoping, informal conversations, and historical observations across the district have not shown MBGR to be a concern."

Objection:

The Department objects to the decision to disallow MBGR.

Rationale:

The SCRD did not adequately analyze MBGR as a viable option citing "an effort to maintain consistency in travel management regulations across the State." Although the Department applauds the effort to maintain consistency, the Department has consistently requested MBGR for elk, deer, bear, pronghorn, and bison statewide in each NEPA process. The SCRD cannot defer to the NEPA process of another forest, under another forest plan, at another time, but must analyze the effect of MBGR under the current NEPA process.

Suggested Remedy:

The Department recommends the District follow previous requests for all forests statewide, i.e. to "Allow MBGR on all Arizona forests for legally taken and tagged elk, mule deer, bear, and bison during an open season for those species and for twenty-four hours following the end of each season provided it can be done without unreasonable resource damage. Although the Department did receive Forest Supervisor Kerwin Dewberry's May 30, 2018 letter (Attached) regarding MBGR for elk, the Department believes it is imperative to clarify that the Department also manages elk, mule deer, bear and bison populations through non-permit tags, obtained without a random drawing. Therefore the Department recommends the District follow previously stated requests for all forests statewide, i.e. to "Allow MBGR on all Arizona forests for legally taken and tagged elk, mule deer, bear, and bison during an open season for those species and for twenty-four hours following the end of each season provided it can be done without unreasonable resource damage."

How, if applicable, the proposed changes are inconsistent with law, regulation, or policy:

The decision to disallow MBGR reduces the State's ability to manage wildlife, reduces the ability for hunters to harvest and retrieve wildlife, and is therefore inconsistent with Executive Order 13443 which requires federal agencies to implement actions that expand and enhance hunting opportunities for the public.

**SPECIFIC ROAD CLOSURES, ROUTE DESIGNATIONS, AND ASSOCIATED LOST CAMPING OPPORTUNITIES**

Route 4430

Mr. CJ Woodard

July 23, 2018

4

Prior Specific AGFD Comments from July 31, 2012 letter:

"The Department would like this historic 4-wheel drive road to remain open to all motorized vehicles. It is proposed to be closed to avoid a range improvement; however, the Department recognizes the road as an existing System Road that provides hunting and dispersed camping opportunities. The Department believes the range improvements can be avoided or mitigated for continued public use."

SCRD Response:

"This road is proposed restricted to protect the Lowland Leopard Frog, a Forest Service sensitive species. The road is currently gated and locked past the forest boundary. It is proposed restricted for continued range permittee access, but restricted to reduce recreational use and therefore, impacts to Lowland Leopard Frogs."

Objection:

The Department objects to the closure of this road to public use; the analysis is inadequate to justify closure.

Rationale:

The Department finds it disingenuous that the District previously described the need to close this road as necessary to protect range improvements but now describes the need due to the Lowland Leopard Frog. The Department does not have record of any discussion with the Forest on the need to close this road due to impacts to Lowland Leopard Frog and requests the District provide evidence that the public poses a threat to leopard frogs in this area. The Department contends that route 4430 is not close to any leopard frog population.

Suggested Remedy:

The Department suggests the District maintain this road as open for all public uses. If there is a concern about OHV damage in a specific area, such as where it enters the unnamed tributary to Bullock Canyon, then the road should be closed only where it can most logically prevent such damage yet maintain access for hunters and recreationists.

How, if applicable, the proposed changes are inconsistent with law, regulation, or policy:

The decision reduces hunter access and the ability for hunters to harvest and retrieve game, and is therefore inconsistent with Executive Order 13443 which requires federal agencies to implement actions that expand and enhance hunting opportunities for the public and to work collaboratively with State governments to manage and conserve game species and their habitats in a manner that respects State management authority over wildlife resources such as lowland leopard frogs.

**Route 7705**

Prior Specific AGFD Comments from July 31, 2012 letter:

Mr. CJ Woodard

July 23, 2018

5

The Department would like to propose a modification to the Proposed Action for the 7705 road. The Department proposes to include the first approximate 3/4 mile up to and including its intersection with the unauthorized segment 7705-0.46R-1. Then add the 7705-0.46R-1 to allow increased camping off the main FS 746 road. Close the remaining segment of 7705 up Dodge Tank Wash using the ML2 "Restricted to Authorized and Permitted Use Only".

**SCRD Response:**

Route 7705 was built for the sole purpose of access to Dodge Tank. Recreation access has led to destruction of the tank and caused erosion damage to the surrounding area. The 7705 road is proposed for restricted access to prevent vandalism and ongoing resource damage in the area. 7705-0.46R-1 is proposed for decommission as it is causing erosion damage into Dodge Wash. In addition 7705-0.46R-1 is a redundant road since other camping opportunities along road 736 exist in relatively close proximity, such as 737, 640, and 736-11.03-R-1. Arizona Game and Fish could be allowed to access the water catchment on 7705 under a special use permit.

**Objection:**

The Department objects to the decision to close this entire route.

**Rationale:**

Our proposal would achieve the District's objective by altering recreational access to, and destruction of, the tank while maintaining camping opportunities (which are extremely limited in this area due to the steep terrain). The District has not provided adequate justification for not maintaining the first segment of this road open for camping and parking.

**How, if applicable, the proposed changes are inconsistent with law, regulation, or policy:**

The decision reduces hunter access and the ability for hunters to harvest and retrieve game, and is therefore inconsistent with Executive Order 13443 which requires federal agencies to implement actions that expand and enhance hunting opportunities for the public and to work collaboratively with State governments to manage and conserve game species and their habitats in a manner that respects State management authority over wildlife resources.

**Bypass Segment of FS 35**

**Prior Specific AGFD Comments from July 31, 2012 letter:**

The CAT team suggested the Forest Service develop a plan to bypass a segment of the FS 35 road that is closed to the public by locked gates between Sections 31, T14S, R19E and Section 6, T15S, R19E and by private property owners, at the old Clopton Ranch, Section 1, T15S, R18E. This reroute would occur entirely on Forest Service lands and be approximately 1/4 mile in length to achieve the bypass. This new road would rejoin the 4410 and FS 35 just south of the township line in Section 6, T15S, R19E and Section 1, T15S, R14E. This new connection would be on level ground and reopen an inaccessible, 2 mile segment of FS 4409 that is currently locked to the public. The Department highly favors adding this proposal to the TMP and supports further evaluation of this potential bypass under NEPA.

Mr. CJ Woodard

July 23, 2018

6

SCRD Response:

This Travel Management process does not involve new construction of roads, but rather the designation and changes of current roads and unauthorized existing routes.

Objection:

The Department objects that this was not included in the analysis.

Rationale:

Supervisor Upchurch informed the CAT that if consensus could be reached with the group that the re-routing of access through alternative alignments of roads could be studied under this process. This was important in that it allowed the CAT to agree on routes that otherwise might not have consensus. If the use of the alternative alignments to reach CAT consensus was genuine, then the reroute was proposed by the CAT and should be included in this NEPA process or a complementary process. After appropriate NEPA is completed, this route could be constructed in one day. It has been six years since the suggestion through CAT members was raised. The Department raised this point in our 2012 letter and in 2014 but NEPA has not been initiated for it.

How, if applicable, the proposed changes are inconsistent with law, regulation, or policy:

The decision is inconsistent with Executive Order 13443 which requires federal agencies to implement actions that expand and enhance hunting opportunities for the public and to work collaboratively with State governments to manage and conserve game species and their habitats in a manner that respects State management authority over wildlife resources.

The Department hereby submits the objection pursuant to Project Level Objection Process, 36 CFR 218.8 (A) (B) (D).

Sincerely,



Craig McMullen

Assistant Director, Field Operations Division

Enclosure(s)

AGFD Log# M18-06110123



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

5000 W. CAREFREE HIGHWAY  
PHOENIX, AZ 85086-5000

(602) 942-3000 • [WWW.AZGFD.GOV](http://WWW.AZGFD.GOV)

REGION V, 555 N. GREASEWOOD ROAD, TUCSON, AZ 85745

GOVERNOR  
JANICE K. BREWER  
COMMISSIONERS  
CHAIRMAN, ROBERT E. MANSELL, WINSLOW  
KURT R. DAVIS, PHOENIX  
EDWARD "PAT" MADDEN, FLAGSTAFF  
JAMES R. AMMONS, YUMA  
J.W. HARRIS, TUCSON  
DIRECTOR  
LARRY D. VOYLES  
DEPUTY DIRECTOR  
TY E. GRAY



15 August 2014

Stan Helin  
District Ranger  
Santa Catalina Ranger District  
5700 N. Sabino Canyon Road  
Tucson, AZ 85750

RE: Santa Catalina Ranger District Travel Management Plan

Dear Mr. Helin:

The Arizona Game and Fish Department (Department) appreciates Coronado National Forest's (Forest) effort to reissue the scoping notice and comment period for the TMP on the Santa Catalina Ranger District (SCRD) and for consideration of the Department's recommendations. The Forest has provided the Department opportunities to provide input into travel management on the SCRD beginning in 2007 with the Transportation Analysis Plan (TAP) and continuing through the process to the current plan including our participation on the Collaborative Alternative Team (CAT).

In general, the Department supports the proposed action as presented in the Environmental Assessment (EA) and maps dated August 2012 with CAT notes. We understand that the CAT notes indicate the preferred alternative despite the routes having different color-coded designations. The Department believes the TMP maintains a level of motorized access sufficient to reasonably accommodate recreational uses, including fishing, hunting and wildlife viewing with the exception of following unresolved issues and/or further recommendations:

**General Comments**

The Department continues to seek standardization of camping and travel regulations across all Arizona Forests to eliminate confusion for a multitude of outdoor enthusiasts statewide. These standards should include:

- Motorized big game retrieval is allowed on all Arizona Forests for legally taken and tagged elk, deer, bear, pronghorn, and bison during an open season for those species and for twenty-four hours following the end of each season provided it can be done without unreasonable resource damage.

- Open and closed roads are clearly and uniformly marked and the public is not expected to decipher them from a motor vehicle use map.
- Dispersed camping opportunities are maintained with access to all existing user-created campsites and camping regulations are clearly and uniformly marked.

### **Specific Comments**

#### **PREVIOUS DEPARTMENT COMMENTS NOT REFERENCED**

Appendix B does not include the Department's comments, nor is the Department listed as a commenter. Our records indicate we have sent written comments to the Forest on the subject of TMP beginning in 2007, specifically in letters dated May 29, 2007, April 13, 2009, September 22, 2010, and July 31, 2012 that document our comments on the various stages of the TMP. We also provided comments on the TAP and participated on the CAT. We incorporate all previous comments by reference (notwithstanding previous comments superseded by later comments as issues have been resolved). The text of the EA describes the evaluation of "7 comment letters" received and reviewed with regard to the Proposed Action. The Department questions whether our 2012 letter regarding the Proposed Action was evaluated thoroughly.

#### **FOREST ACCESS AT EAST RANCHO CATALINA PLACE**

The east end of East Rancho Catalina Place (Section 30, T12S, R14E) is a dedicated CNF Right of Way (ROW) on the plat map recorded with the county but does not appear as an NSFR and has not been analyzed under the EA.

The Department has requested that this rare publically-owned ROW to the Forest be analyzed and that the public be allowed to comment on appropriate uses. The Forest has not analyzed this road under the EA. The Department again requests that the road appear on maps and be analyzed under the NEPA.

#### **Proposed Changes to the Forest System Roads:**

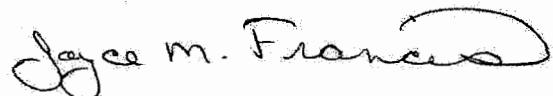
##### **Route ID: 4448**

Under the Proposed Action, this road will be designated ML 2 "Restricted to Administrative and Permitted Use Only". The Department requests this road remain open as the public historically used this system road to access terrain near Bullock Canyon. If access is terminated at the 4447 road, there will be an unacceptable loss of recreational access. Hunters and recreational users are currently passing the developed sites and driving to the termination of the road near the section line between sections 24 and 25 to access Bullock Canyon.

The Forest should, at minimum, allow access down slope from the 4447 road, beyond the cabin and water source, to a suitable distance where camping can occur (greater than  $\frac{1}{4}$  mile from the water source), then terminate the road as it approaches steeper terrain toward the east side of the section.

Route ID: 4487 extension should remain open to provide a looping opportunity between routes 639 and 4485.

Sincerely,

A handwritten signature in black ink that reads "Joyce m. Francis". The signature is fluid and cursive, with "Joyce" and "m." on the first line and "Francis" on the second line.

Joyce Francis  
Habitat Branch Chief





United States  
Department of  
Agriculture

Forest  
Service

Coronado National Forest  
Supervisor's Office

300 West Congress St.  
Tucson, AZ 85701  
520-388-8300  
Fax: 520-388-8305

File Code: 1900  
Date: May 30, 2018

Ty Gray  
Director  
Arizona Game and Fish Department  
5000 W. Carefree Highway  
Phoenix, AZ 85086-5000

Dear Mr. Gray:

During our May 9, 2018 coordination meeting, motorized big game retrieval (MBGR) on the Coronado National Forest was brought up as a topic of discussion. The Arizona Game and Fish Department's (AGFD) desire is that MBGR for elk be provided for on every national forest in Arizona. However, Regional Forester Cal Joyner explained that the Forest Service cannot provide for MBGR when the circumstance for its necessity (i.e. the presence of a huntable elk population) does not yet exist. A few restricted non-permit population management hunt tags are issued to control elk on private lands near the Coronado National Forest but, as of now, there is no huntable population of elk on the forest.

The following solution was offered by the Regional Forester: The Coronado National Forest will analyze MBGR for elk if and when a huntable population of elk becomes established on the forest **and** the Game Commission assigns a hunt number establishing the availability of hunt permit-tags obtainable through a random drawing. This statement will apply to past and future Travel Management Plans on the Coronado National Forest.

We hope this meets the needs of the Commission and Department, as well as those of the hunting public.

Sincerely,

*Kerwin S. Dewberry*  
KERWIN S. DEWBERRY  
Forest Supervisor

cc: Raul Vega

RCV'D  
JUN 04 2018  
DOHQ  
RC  
JUN 04 2018  
DOH



