



October 29, 2019

M. Stephen Best, Forest Supervisor
Apache-Sitgreaves National Forest
P.O. Box 640 Springerville,
AZ 85938

RE: Revised Draft Environmental Impact Statement for the Public Motorized Travel Management Plan

Dear Mr. Best,

On behalf of the Arizona Chapter of Backcountry Hunters & Anglers, thank you for the opportunity to comment on the Revised Draft Environmental Impact Statement for Public Motorized Travel Management Plan (RDEIS).

AZ BHA is aware that the intent of this TMP is to bring the Forest into compliance with the 2005 Travel Management Rule (TMR) and expects that this will be done in a manner that takes the public land multiple use mandate into account.

We also expect that this planning effort will be fully informed by input from your cooperating agencies; the AGFD and the Eastern Arizona Counties Organization, as well as remain consistent with recent court decisions.

AZ BHA has reviewed the RDEIS and found each of the proposed actions unacceptable.

Our concerns for each action are summarized below:

- **Alternative #1 – No Action:** AZ BHA does not support this alternative due to the fact that the road system that is currently in place is not being utilized as intended by the general public. There are multiple instances where “closed” roads remain accessible and under regular use. This is largely due to lack of signage, enforcement, education, etc. This leads to habitat and resource destruction and no alternative addresses this fact. The Forest must redo its analysis of the Alternatives using baseline data that accurately reflect conditions on the ground, treating all existing roads used by the public (not just system roads) as part of the existing condition. Non-system roads that would be added to the system under one or more Action Alternatives must not be considered as additive effects in the analysis.

- **Alternative #2 – Proposed Action:** AZ BHA does not support this alternative due to the substantial net increase of motorized roads that would become accessible as well as establishing unnecessary limits on dispersed camping. The Proposed Action drastically curtails access for dispersed camping to a degree that will significantly and adversely impact opportunity for Forest visitors. These arbitrary constraints imposed by the Proposed Action will result in a net increase, rather than decrease in resource impacts associated with dispersed camping, by concentrating use in a smaller number of areas.
- **Alternative #3:** The Proposed Action drastically curtails access for dispersed camping to a degree that will significantly and adversely impact opportunity for Forest visitors. The near total removal of dispersed camping opportunities is unacceptable.

It has been established that a high level of road density in elk habitat has a negative impact on the elk population. In general, the Apache-Sitgreaves has a high density of roads even if many are not legally open for use by the public. A lack of enforcement presence along with a lack of signage on these old logging roads has resulted in a disturbance level to the elk and deer population that is unacceptable.

We feel that the USFS has historically been very accommodating in providing roads for use by ATVs and UTVs which in some cases has led to the detriment of not only the wildlife population and habitat but also to those forest users who cherish the peace and quiet of remote roadless areas. We recommend that the USFS reduces the density of open roads on the forest to a level recommended by valid studies that have been conducted and enforce currently closed road statuses throughout the forest.

As referenced in the Department of Agriculture Forest Service 36 CFR Parts 212, 251, 261, and 295, the number of ATVs and UTVs has grown exponentially in recent years and the damage to the habitat by uncontrolled illegal use is evident in many areas of the forest. We encourage the USFS to have an enforcement plan in the TMP that provides increased law enforcement patrol in coordination with other agencies such as the AZGFD to curtail the illegal operations of these vehicles and to educate the public. We also encourage the USFS to increase signage efforts to ensure that those roads closed to vehicular use are signed as such. Many of the roads that are currently closed by the USFS are in actuality open and in use illegally by users. In many cases these roads are unsigned and thus the public believes that they are open for use. In some cases, the roads are bermed and even posted closed with carsonite signs but due to lack of enforcement and education they are being regularly and heavily used. Case in point are the multitude of 'closed' logging roads in the Middle Mountain area that are being used by hunters during elk season, thus giving the elk no rest or refuge from the encroachment.

Current law does not allow the operation of vehicles on the vehicles if they are damaging to the habitat or wildlife. We suggest that the current unrestrained use on closed roads are very much damaging to both. We also suggest that the USFS is

under no obligation to provide an ever-increasing road system to OHV users. There are more than enough legal roads open for their use without providing more 'opportunity' and causing increased negative impact on the habitat and wildlife as well as reducing the quality of outdoor experience to many other users.

AZ BHA recognizes the increase in popularity of OHVs and recognizes their right to use the public lands under the multiple use plan. We believe that public land is limited in amount and cannot have unlimited use by all users to the detriment of the environment.

In short, in many areas, our public lands are being loved to death by its users. Wilderness hikers have a different view of the multiple use concept than OHV'ers, or hunters or any other forest user. That said, one user cannot be favored over another unless that user's activity has no impact on other users. Nor can it be allowed that an industry, such as OHV manufacturers, be allowed to direct the public's use of public lands.

Our members have gratefully used the A-S for many decades as hunters, hikers, fisherman, birdwatchers, mushroom gatherers and OHV use. We support those uses but ask the USFS to wisely apportion those uses to allow the continued public use of the forest without further degradation of the habitat or wildlife.

Sincerely,
The Arizona Chapter of Backcountry Hunters & Anglers
www.backcountryhunters.org.