



October 30, 2019

***Comments submitted via online comment form.***

Apache Sitgreaves National Forest  
Attn: Stephen Best  
30 S. Chiricahua Dr.  
Springerville, AZ 85283

**RE: Comments on the Apache Sitgreaves National Forest Revised Draft Environmental Impact Statement for the Public Motorized Travel Management Plan**

Dear Mr. Best,

Please accept the following comments from Trout Unlimited (TU) on the Apache Sitgreaves National Forest Revised Draft Environmental Impact Statement for the Public Motorized Travel Management Plan (RDEIS)(TMP). We appreciate the Apache Sitgreaves National Forest's (A/S) efforts in providing a thorough and comprehensive review of alternatives in this important planning process.

Trout Unlimited supports the travel management and planning recommendations as prescribed by Alternative 2, with reservations. In moving to a designated route system for motorized vehicles, the A/S will benefit significantly. Protection and enhancement of habitat for fisheries, big game species and threatened and endangered species that occupy critical riparian, wetland and stream and river areas will benefit; the public will see the positive effects of this forest engaging in responsible travel management activities. We congratulate the staff for their diligent work in collaborating with the diverse user groups and variety of stakeholders as we move into a new era of travel management on one of the largest national forests in the continental United States.

Trout Unlimited is actively engaged in the A/S TMP and Black River Restoration Plan, submitting comments throughout both planning processes. Watersheds remain our chief concern and we provided comments focused on protecting riparian vegetation to protect streambank integrity and encouraging the forest to adopt long-term conservation strategies for fisheries and other species dependent on the riverine ecology. Therefore, TU supports a travel management plan that protects its watersheds from irresponsible off-road use. Our primary concern with Alternative 2 is the opportunities for high erosion and sedimentation issues with the existing road routes, resulting in stream and riparian impacts. Since the stated purpose of travel management is to reduce resource and user conflicts, we urge the Forest to consider management actions that protect more stream and riparian crossings than outlined in Alternative 2, conduct maintenance on existing roads to decrease sedimentation into downstream perennial, intermittent and ephemeral streams and limit the number of stream crossings by motorized vehicles.

**Organization Background**

Trout Unlimited is the nation's oldest and largest coldwater fish conservation organization, with over 300,000 members and supporters nation-wide including 2000 members in Arizona. Our mission is to

conserve, protect and restore North America's coldwater fisheries. Our volunteer members actively utilize and enjoy the resources of the many streams, lakes and watersheds located on the Apache Sitgreaves National Forest.

We have four TU chapters (the Zane Grey, Gila Trout, Grand Canyon, and Old Pueblo chapters) whose members actively fish, recreate and contribute to on-the-ground restoration efforts within the A/S. Our volunteer members have contributed countless hours on this forest, working on river and stream restoration projects, reintroduction of native trout species, trail maintenance, fish barrier improvements and other projects.

### **General Comments about the Revised Draft EIS**

Trout Unlimited understands the importance of addressing the myriad of issues associated with public use on national forests. We appreciate the Apache Sitgreaves National Forests plan to manage the use of motorized vehicles on our public lands, especially under an increasing public who prefer easier access to natural resource treasures. Trout Unlimited works with partners to find a balance between quality motorized recreation and healthy fish and wildlife resources. Several defining issues have surfaced on the Apache Sitgreaves National Forest that now results in a more disciplined and defined motorized plan.

- Resource damage to fish and wildlife considerations
- Conflicts between motorized and non-motorized users
- Unauthorized use on closed roads and trails
- Road access for administrative use only
- Confusion, misunderstandings and lack of communication regarding route access and designations
- Management of Motorized Big Game Retrieval

As an organization with members who both fish and hunt, we are impacted by all six of the stated issues. Motorized vehicles can degrade streams and aquatic habitats for threatened native Apache and Gila trout while also displacing deer, elk, and other wildlife species, reducing the effectiveness of their habitats. Excessive motorized routes can reduce the quality of an outdoor experience, particularly in the backcountry areas so valuable to the Apache Sitgreaves National Forest. Finally, illegal and irresponsible off-road vehicle (ORV)<sup>1</sup> use can ruin a stalk on big game, diminish secure habitat areas, cause new resource damage issues, and create a poor reputation for responsible ORV use.

Trout Unlimited is a vital member in a partnership called Sportsmen Ride Right (SRR) which an educational effort to promote ethics among the motorized sportsmen and sportswomen community. We believe that most sportsmen and women ride their ORVs responsibly and stay on authorized trails and roads. The SRR effort supports those individuals to be representative of the responsible use of ORVs and helps rein in those who create illegal and unauthorized trails and cross-country motorized travel on our public lands. Our members are users of motorized vehicles on public lands to access quality fishing and hunting opportunities and recognize the privilege of ORV use on our public lands. As such, we recognize that there are places where motorized vehicles are simply not appropriate and places where riding could and should be encouraged by land management agencies.

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<sup>1</sup> For purposes of our discussion, unless particularly referenced, off-road vehicle use will collectively be referred to as ORV. We do recognize that to a motorized user, OHV, ORV, ATV, and UTV all have different meanings.

Trout Unlimited commends you for moving forward with a designated route system for motorized vehicles and we applaud your efforts to bring surety and balanced management to our public lands. We believe strongly that a designated motorized route system that eliminates motorized cross-country travel is essential to public lands management. Designated routes for motorized vehicles not only protect habitat for fish and wildlife, they also prevent user conflict and give public land users options to choose their experience.

### **Fisheries and Aquatic Habitat Concerns**

Of particular interest to TU, as it relates to motorized vehicle use on the A/S, are areas where highly erodible soils threaten spawning habitats, aquatic invertebrates and populations of wild and native fish. The highly erodible soils in this forest make it difficult to balance a quality vehicle recreation experience with protecting valuable resources. While the proposed action does close 393 miles of roads TU would like to see existing roads better maintained to handle sediment run off from vehicles so that further impacts to streams and rivers are minimized. We urge the Forest to evaluate any increased motorized access in some of the more sensitive stream channels, including ephemeral and intermittent drainages. These drainages easily accumulate sediment from various types of impacts and increased ORV use compounds downstream impacts when rain or moisture events occur. Trout Unlimited does acknowledge and applauds the Apache Sitgreaves National Forests strong effort to conserve Native Apache Trout habitat. By reducing the current 195 stream crossings of perianal, intermittent, and ephemeral streams in the Apache trout historical range footprint to merely 15 stream crossings in Alternative 2.

The RDEIS has identified numerous main objectives with the preferred direction of lowering impacts to the forest resource. We applaud this effort. We also understand the increased public use on this forest and the A/S's efforts to appease ORV users by increasing some trails and route access while trying to lower user conflicts, dispersed camping and cross-country travel. Watershed conditions on the Apache Sitgreaves National Forest must be protected. These include riparian areas that are so vital to maintaining healthy streams and rivers as well as providing important habitat (including transition habitat) for big game, aquatic species, numerous amphibians and reptiles, songbirds, and threatened and listed species. We have specific comments about the variables addressed in Alternative 2.

1. Trout Unlimited is concerned that Alternative 2 only decreases 393 miles of roads within mapped riparian areas. We would prefer to see this number increased to reflect Alternative 3's mileage (1156 closed road miles). While we appreciate the forest's desire to lower the direction of impacts on streams and riparian areas, we do not believe the Alternative 2 objective is adequate to meet this goal.
2. This same concern is issued with the desire to minimize impacts to perennial stream crossings. Reducing crossings from the current 189 stream crossings identified in Alternative 1 to 135 in Alternative 2 is not necessarily a strong conservation effort. We suggest lowering this number further. Watershed protection should be a major objective on any forest.
3. For any new routes under consideration and old routes that need to be improved, TU recommends the motorized routes and trails be located a minimum of 500 feet from all streams, wetlands, riparian areas, lakes and rivers. Routes that currently access streams and riparian area in poor condition should be closed or have appropriate sediment reduction materials installed. We also recommend an annual monitoring plan be implemented that annually tracks impacts to stream crossings. Listed below are five roads that should be closed to the public and only accessible for administrative purposes for state and federal agencies.

- FR-72M borders West Fork of Black River (WFBR). Arizona Game and Fish Department (AZGFD) needs access for barrier maintenance and monitoring.
  - FR-601M drives through the meadow surrounding Wildcat Creek and crosses the creek at least once. This stream has been established as a potential Apache trout reintroduction stream by the AZGFD.
  - FR-68A borders WFBR and leads to West Fork Campground. FR-68A then continues past the campground and crosses WFBR three times. We would like to see FR-68A stop at the campground and give only administrative motor vehicle access pass this point.
  - There is a user created road that borders Thompsons meadow. It originates off FR-116 (33.889828, -109.471726), crosses Burro Creek and continues up towards the headwaters of WFRB. The road crosses WFBR at the top of Thompsons meadow and signs of dispersed camping can be found. (33.894648, -109.481403).
  - At Wildcat bridge on FR-25 a user created road leads to the stream banks of the WFBR. Signs of dispersed camping and fishing can be found. Please barricade off this user created road and position signs explaining the detrimental effects vehicles are to stream bank erosion and ultimately trout habitat.
4. Fish are sensitive to runoff, stream channelization and degradation which occurs when motorized use is inadequately managed or poorly planned. Route management planning is inherently good for fish as it tends to eliminate redundant routes and limit motorized use in riparian areas and areas of sensitive soils.
  5. Signage is important in communicating with the public. The more informative and interactive the signage, the stronger the support for protecting a resource. We recommend collaborative sign-making that involve user groups who use stream crossings. Educating the public as to why stream crossings in sensitive watersheds leads to significant resource impacts can help the public engage in creating remedies and address user problems.

### **Motorized Big Game Retrieval**

We remain concerned about the one-mile travel corridor from designated motorized routes. Due to the size of the A/S, identification of areas transitioning from general forest landscape to more special designated areas (such as Inventoried Roadless Areas, Wilderness Areas, Wild and Scenic River areas) are often unmarked and travelers could easily find themselves within a Wilderness Area unknowingly.

We do not support the extension of a one-mile corridor for those highly sensitive areas (such as close to Wilderness or inventoried wilderness areas) and special designated areas that extend beyond the designated motorized route. Removing the one-mile corridor delineation would do a number of things: 1) it would protect those resources and any fish and wildlife habitat within the geographic area, 2) it would reduce user conflicts since the non-motorized recreationist would be more likely accessing these special areas, and 3) One-mile corridor travel from existing roads that do not butt up against designated special places would still permit game retrieval access and other existing uses and provide for the maintenance and management of habitat and fish and wildlife habitat populations.

The Apache Sitgreaves National Forest provides incredible opportunities for backcountry solitude, camping, fishing, hunting and an assortment of recreational activities. Travel planning is a very serious issue with the public and our comments have been developed with respect to the motorized travel community and their wishes to expand motorized routes in this forest. Consistent and fair travel restrictions can benefit every user. We commend the Apache Sitgreaves National Forest with the proposed Alternative 2 to decrease roads within the A/S.

We also strongly suggest that the preferred alternative include investing public involvement in road and trail management and maintenance. Overall, we have identified the following recommendations.

1. Vest users to help maintain these trails.
2. Partner in compliance (education)—invest in effective outreach programs that can measure a change in perception/behavior based on program objectives. This behavior starts early and is generational.
3. Maintain consistent signage.
4. Simplify & eliminate multiple maps for an area. Keep maps updated.
5. Indicate reason for decommissioned or seasonal closure (wildlife or resource protection, etc.) to help the public better understand such actions.
6. Address specific resource concerns on current trails, closing trails where appropriate for the benefit of the resource.

### Summary

In summary, Arizona's sportsmen's groups recognize the effort the Apache Sitgreaves National Forest has taken on behalf of the public in developing the proposed action. It is a positive step towards long-term resource protection goals; however, TU remains concerned about portions of the proposal which allows for off-route motorized travel in some areas that are too close to highly sensitive landscapes.

Off-route motorized vehicles have a place in our sporting and recreation culture and on our public lands. And we know from experience with other national forest's travel management plans that creating a responsible designated trails and routes system will prove to be beneficial for all users and it provides a level of certainty that our children and future generations will have a well-managed forest. Protecting habitat for big game and fisheries means better hunting and fishing opportunities for all.

Our key considerations that we believe help guide the future of motorized use on the Apache Sitgreaves National Forest include:

- Effects on wetlands and riparian areas.
- Effects on route sustainability and potential for sedimentation into water sources and other water quality concerns.
- Effects on terrestrial wildlife including big game, threatened, endangered and sensitive species and management indicator species, and other terrestrial and aquatic species.
- Effects on the character of inventoried roadless areas and Wilderness areas.
- Effects on the agency's ability to manage and enforce the ORV system.
- Effects on opportunities for non-motorized recreation.
- Effects on the spread of noxious weeds and the spread of other invasive species.

Thank you for your consideration of our comments and for your efforts in protecting our public land and fish and wildlife resources.

Sincerely,



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