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**October 27, 2019**

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

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

Dear Mr. Best,

Thank you for the issues you addressed in the RDEIS, analyzing various remedies to address the increasing number of unmanaged motorized recreationists on the Forest to prevent further resource damage. We appreciate the opportunity to submit comments and support your proposed action Alternative 2, except as stated in the following comments.

There are issues not yet fully analyzed that may cause social or economic harm and place rural communities, local governments, hunters, outdoor recreationists, grazing permittees, private land inholdings, and the at least 2-million annual visitors to the Apache-Sitgreaves National Forest at risk.

It is important to note that water-based outdoor recreation as an industry ranks above mining and golf in terms of total economic output to the state. The industry contributes \$7.1 billion to Arizona's GDP, provides \$4.5 billion in household income and generates \$1.8 billion in tax revenues (<https://www.audubon.org/news/outdoor-recreation-along-arizonas-waterways-13-billion-industry#targetText=Water%2Dbased%20outdoor%20recreation%20as,%241.8%20billion%20in%20tax%20revenues.>)

Water based recreation occurs primarily on national forests. Recreation is the most common non-extractive use on national forests. Though extractive, hunting, fishing, and gathering are included in recreation data. As a supervisor of a national forest, you are mandated to provide outdoor recreation opportunities in natural settings, to maintain and enhance open spaces and public accessibility, and to maintain and enhance "cultural, wilderness, visual, and natural resource values" through a variety of management tasks and activities (FSH 2302). This includes providing motorized public access to comply with that mandate.

Further, as a critical consideration in travel management planning, and found in the Socio-Economic Assessment for the Apache-Sitgreaves National Forest in 2005 it states: "The communities surrounding the Apache-Sitgreaves National Forests have long been dependent upon natural resources for commodity production, tourism, and aesthetic enjoyment. A review of state and local newspapers reveals a general interest in the use and management of forest resources with particular attention paid to the effects of fire and recreational uses such as hunting and fishing." Also, in the assessment: "...the Forest Service is making a concerted effort to address the needs and desires of historically underserved

communities, a fact that is increasingly important to the Apache-Sitgreaves National Forests given the rates of demographic change in the region.” These findings were critical to the Forests land management plan and should also be critical in the travel management plan and considered in more detail. Motorized public access, particularly long established access, based on prior assessments or opinions, that was found to have no adverse effects, no adverse modification or not likely to jeopardize, must be reconsidered where in your RDEIS that motorized public access is planned for closure or limited use. Additionally, as was already determined, the Forest has several challenges in maintaining efficient and equitable forest access, with shortfalls in road funding causing difficulties in maintaining as well as signing roads. The requirement to implement further restrictions on long established uses such as public motorized access or dispersed camping would cause unnecessary conflict and hardship for users as well as law enforcement including Search and Rescue. SAR missions frequently depend on motorized accessibility for safe and timely extractions.

Further evidence found in the Socio-Economic Assessment noted the indirect economic consequences of closures on long established forest roads would be considerable for surrounding communities. This includes the extent and quality of forest roads having a substantial impact on the economic costs and benefits associated with recreational users. A more detailed analysis must be done to address the affected counties and the social and economic effects as defined in their comprehensive plans including the need to protect the area’s recreation and tourism industries that rely on the Forest. Note, Forest Managers identified winter and water-based recreation as key components of the Forests recreation. Again, this must be analyzed in more detail in the RDEIS using the best available information for individual counties and communities.

To close a significant amount of dispersed camping sites in areas where there is critical habitat, when it is determined that overall use would have minimal effects on the species or its critical habitat, is arbitrary and noncompliant with the Multiple-Use Sustained-Yield Act (MUSYA) of 1960 and contradictory to established U.S. Fish and Wildlife Service (USFWS) Biological Opinion Terms and Conditions on a number of species. This proposed management direction to severely limit dispersed camping is not consistent with biological need and is contradictory to your own and USFWS determinations. This severe reduction in accessible acres on public land for dispersed camping must be reconsidered for species and critical habitat, where it is shown to have negligible effects, particularly where Forest Plan Standards and Guidelines provide direction that was previously found by the USFWS to minimize threats and provide for no adverse modification of critical habitat and no adverse effects or not likely to jeopardize species.

It is well documented the Arizona Game and Fish Department has worked cooperatively with the Forest in evaluation and inventory of dispersed camping sites, appropriate corridors, the need for open roads, and access to wildlife infrastructure for maintenance (i.e., water developments). All of these factors must be considered with regard to dispersed camping and established public motorized roads to avoid concentrating the 2 million visitors each year on the Forest that have the potential to cause new and unnecessary damage to resources that otherwise would not occur with a more reasonable level of dispersed camping sites and motorized public use roads. Further, the Forest must include in the RDEIS analysis all established dispersed camping sites, rather than an incomplete inventory. This is critical for the annual 2 million visitors, and the local social and economic effects of this significant level of recreation.

Specific to Motorized Big Game Retrieval (MBGR), pertinent case law (*WildEarth Guardians v. Provencio*, No. 17-17373, 9th Cir. 2019) and more precise site-specific analyses must be considered in the RDEIS, as

it is not clear this was accomplished. Transparency and effective public involvement are severely lacking, with the use of incomplete data and unsupported hypotheses regarding impacts of established roads considered for closure, to instead remain open for motorized public use or MBGR. A review of prior Forest planning documents reveals significant discrepancies in the miles of roads used for motorized public access over many decades. All prior environmental assessments across the entire Forest must be considered in this RDEIS analysis, that by either default or specific data, recognized all forest program areas use many miles of roads for appropriate Forest management and motorized access. And, based on Forest documentation and annual reports for Forest-wide conditions, this use of motorized public access roads has *not* been documented in annual specialists reports to indicate any significant adverse effects to overall Forest conditions.

Further, the RDEIS failed to fully analyze the need for MBGR, specific to the A.R.S. 17-340 which prohibits waste of game meat. Also, it is critical to avoid discrimination against women and young adults compared to adult men and smaller or weaker adult men compared to stronger men specific to game animal species and whether MBGR is needed. It is arbitrary and capricious to make an unwarranted assumption of when MBGR is needed most, simply based on the weight of an elk and the number of game animal harvests. This completely ignores the greater issue of individuals safety and abilities in the effective and timely removal of game meat, such as when a licensed 11-year old or smaller stature adult are obligated to comply with the state law. Because MBGR has been a long-established practice and prior Forest or Travel Management Plans have supported its use for all big game animal transport, the RDEIS must complete a more detailed and appropriate analysis, particularly considering these issues. If through this higher level of analysis significant resource damage may occur, then an appropriate site-specific decision can be made.

The Forest RDEIS travel management map must provide more detail for appropriate analysis, including all of the established dispersed recreation sites, the areas for ingress and egress to private lands and all County and State road needs and maintenance obligations. Ingress and egress to private lands to avoid being landlocked and to provide the safest route and one that may cause the least amount of resource impacts should be considered for easement where the need has not yet been provided prior to finalizing this RDEIS.

Also, we request you provide the updated usda.gov email addresses for EIS information contacts.

Sincerely,

Bill, Mona and Marci Bunnell