

**From:** [REDACTED]  
**To:** [FS-asnftravel](#)  
**Subject:** Comments for Revised DEIS for Public Motorized Travel Plan  
**Date:** Saturday, October 26, 2019 9:29:16 AM

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To: USFS, Apache Sitgreaves NF

COMMENTS for Revised DEIS for Public Motorized Travel Management Plan

From: Richard Inman

[REDACTED] [REDACTED] [REDACTED]

Hello, please consider my comments in your decision making process.

Credentials: 30 yr resident in a small community surrounded by A/S NF. 35 year career as a Federal agency professional forester, wildland firefighter, logging/road engineer, planner, GIS Coord., etc..

As a professional forester and retired logging/road engineer I worked on public forests that had management rules that set a maximum of one mile of system road per Section (square mile). As other administrative or fire access was necessary, those roads were built, then ripped after no longer needed. The A/S has a much higher road density, with little sign of 'putting to bed' any roads, whether system or wildcat. Adding to this road density (the Preferred Alternative) would deepen the unsustainability of the present road system and overall degraded forest ecosystem.

The FS gives little consideration to the LONG-TERM PRODUCTIVITY or ECONOMICS of the forest in their planning process. The economic cost (loss of fiber and lumber, soil loss, and overall health and biological diversity of the forest), from excess non-maintained roads and trails do not seem to be well considered. When the density of system roads and wildcat roads and trails is so extremely high, the negative effects (soil displacement/compaction/erosion, vegetation loss, water quality degradation, wildlife disturbance, landscape level tree growth, etc.) are substantial. Cost/Benefit analyses of the long-term effects of high road and OHV trail density never seems a part of the FS planning process.

Presently, little or no law enforcement of resource degradation caused by wildcat ORV's is in effect. I didn't see anything in the Draft that addresses that deficiency or the need for increased enforcement with the preferred alternative that increase the burden of increased forest access.

Present Road and trail maintenance is pathetically poor. If the FS does not have the current funding (and will likely not have it in the future), why promote a higher density of roads and ATV trails which will just accelerate all the resource problems inherent with increased unmaintained roads?

Two very nearby examples of ongoing road deterioration.

The close by **Maverick Motorized Trail #655** which we use as a hiking trail continues to degrade from ORV users creating numerous “go-arounds” and wildcat branches. The lack of any maintenance or enforcement causes accrued soil loss, gulying, compaction, vegetation loss, etc. This is a primary OHV route, but receives no attention as it rapidly degrades , adding further routes is only going to add to the sources of resource loss.

**Forest spur 9721S** (Pat Mullen cinder pit access and logging spur around the hill) was for many years water bared and signed CLOSED to motorized vehicles (for wildlife and soil protection). A recent prescribed burn in the area required the spur to be opened, but after the treatment, the closure signs were never replaced and the “closed” road is now a heavily used road for OHVs. The whole area is highly eroded.

The point of these two examples is that the present lack of maintenance and resource damage enforcement is very bad, so adding more miles of access will only add to the overall excessive damage to our NF. Access to sensitive meadows, historic and prehistoric sites, invasive plant introduction, sensitive ecosites, etc. just add to the problems created by excessive road and trail density. And, of course all the numerous point sources of erosion and vegetation loss contribute to watershed and landscape level degradation. Loss of water quality and percolation are obvious results.

In conclusion I support Alt #3, as any further higher road density will lead to ever-increasing resource degradation and backlog of unmaintained roads and trails as described above. Any alternative that adds more roads and trails to an already excessive and poorly maintained system is a clear failure to protect our public forest.

It appears that short-sighted pro-ORV special interests have more weight in the NF decision making than professional resource-based management. It would be a miracle to see the FS stand up to all special interest groups and manage for the overall health and productivity of the A/S NF.

Respectfully, R. L. Inman