

From: [rivrcat@everyactioncustom.com](mailto:rivrca@everyactioncustom.com) on behalf of [Laurie Welch](#)
To: [FS-R3 Tonto Plan Revision](#)
Subject: Comments on Tonto NF Draft EIS
Date: Wednesday, March 11, 2020 11:39:39 PM

Dear Draft EIS Kenna Belsky and Beth Rumpza,

Thank you for the opportunity to comment on the Tonto National Forest Draft Plan and Draft Environmental Impact Statement. I appreciate all of the hard work that the planning team has invested in this process already, however the Draft Plan does not have strong enough protections for rivers and their watersheds. I am asking you to revise the Draft Plan to better prioritize healthy watersheds and the river recreation opportunities that they provide.

The Tonto National Forest is home to some of America's most classic and most unique rivers. The Forest is home to the Salt River's famed multi-day run. The Wild and Scenic Verde River and Fossil Creek run through the heart of the Tonto National Forest north of Phoenix, with additional segments of the Verde being studied for Wild and Scenic Eligibility in this Draft Plan. The Tonto is also home to numerous, well-renowned creeks including Salome Creek (The Jug), Tonto Creek (including Hellsgate), East Verde River, Sycamore Creek, and Ellis Creek. Some of these rivers attract paddlers from all over the country and some of them are so unique and challenging they have only gained popularity in recent years - and they all deserve protection.

Please expand the Wild and Scenic River eligibility findings to acknowledge all rivers and creeks that are free-flowing and have Outstandingly Remarkable Values and please consider more protective management direction for sensitive ephemeral and intermittent streams. Ephemeral and intermittent streams have been stripped of their protection under the Clean Water Act and it is critical that land management agencies implement stronger protections for these streams in order to mitigate increasing anthropogenic impacts now, before it is too late.

In order to provide these rivers the protections they deserve, I am asking you to:

- Provide more robust justification and data in the Wild and Scenic Eligibility study; key information is missing and I want to understand why rivers were deemed ineligible and which ORVs were considered
- Use multiple geographical scales when comparing ORVs to the region of comparison and consider the national importance of these values; many of the Tonto's rivers are unique to Arizona and are not found outside the state, making them very nationally unique
- Maintain eligibility determinations for the Lower Salt River, Upper Salt River, Lower and Upper Tonto Creek, Salome Creek, and the Verde River.
- Acknowledge paddling as a primary contributor to ORVs on the Lower and Upper Tonto and on Salome Creek.
- Expand the list of eligible Wild and Scenic Rivers. Numerous additional rivers are free-flowing and possess Outstandingly Remarkable Values and should be determined eligible, including the East Verde River, Christopher Creek, Ellison Creek, and Sycamore Creek.
- Employ stronger protections for ephemeral and intermittent streams throughout the Draft Plan. The definition of streams and stream ecosystems should explicitly include ephemeral and intermittent streams and these stream types should be referenced and prioritized in management direction components.
- Revise the Wilderness Evaluation to include more wilderness quality lands; only 10% of worthy land area has been recommended as Wilderness. Without Wilderness protections, we will risk losing sensitive and remote areas to motorized recreation, unsustainable grazing, and hard rock mining.

These revisions will only make the Tonto NF Draft Plan stronger, providing the Tonto's rivers and surrounding landscapes with the protections they deserve.

Sincerely,
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