

September 7, 2020

To: Acting Regional Forester Sandy Watts, USFS Region 3  
333 Broadway Boulevard SE  
Albuquerque, NM 87102

Plan Being objected to: FHWA Verde Connect Project and Coconino National Forest LRMP Amendment

Responsible Official name and title: Sandy Watts, Acting Regional Forester (Plan Amendment); Karla S. Petty, Arizona Division Administrator, Federal Highway Administration (FONSI)

My prior comments dated May 23, 2020 included my concerns relative to the following: change in scenic qualities; need for Forest Plan Amendment; changes to ROS; cost coverage for new recreation infrastructure; bike lanes; and road project maintenance/project sustainability. In addition, I have new comments related to the DM and FONSI.

1. Comment related to Plan Amendment and process:

This project Decision by FHWA which forces USFS to amend the Coconino National Forest Land and Resource Management Plan, makes a mockery of the forest plans commitment to broad public engagement. The fact that a specific local motor vehicle transportation demand can force amendments to a national forest plan that represents national interests seems highly inappropriate. Amendments under this situation should be very carefully analyzed through adequate national scale public involvement. I do not believe that the Amendment has adequately (both specifically and broadly) addressed changes to visitor recreation experience (ROS) relative to the unique White Hills geographic area, of which scenic quality is a key ingredient.

2. Changes to ROS, visitor recreation experience and landscape analysis:

I believe project effects to the recreation experience and landscape character remain inadequately analyzed, from a number of standpoints. The Draft Plan Amendment states that the project, "would not alter the provision of ecosystem services and multiple uses in the larger plan area". That general statement does not reflect the importance of site specific and geographically unique values to the recreation product offered in the White Hills. The ROS zoning/special nature of the recreation environment would change permanently for the White Hills with the introduction of a paved road. An adequate analysis of the ROS should provide proper public disclosure of these effects as well as allowing better judgment of the Phase II project by decision makers.

ROS is not only about quantity of acreage in each "Class". The semi-primitive area known as the White Hills has a special geographic location as well as developed recreation infrastructure (OHV) and cohort of users, and natural attributes that differ from other SPM areas in the Verde Valley.

The location of the White Hills proximate to several small communities and neighborhoods give them easy access, vs. traveling to more outlying semi-primitive forest lands.

The White Hills provides a natural geographic buffer between urbanization to the north and urbanization to the south, something that is often viewed as a benefit to retention of cultural character. While a paved Phase II would add "connectivity" (to recreation, between communities) it could also destroy "distinctiveness" between urbanized areas. Many communities wish to preserve their distinctiveness through geographic separation. For example, during the upgrading of SR89A between Sedona and



Cottonwood, the public expressed the desire to maintain an “undeveloped” land area between the communities to enhance community distinctiveness. This landscape distinctiveness is currently provided by the semi-primitive conditions of the White Hills landscape.

These are tradeoffs of Phase II that have not been investigated or disclosed and relate to the wisdom of punching a paved road through the middle of the White Hills, thus changing its semi-primitive status and social utility forever.

I can see nothing in the record that indicates that AZ State Parks or any OHV clubs or recreation organizations were contacted to provide comment on this project related to aspects of recreation opportunities. This is a notable oversight.

### 3. Sustainability:

Phase II has no current funding. Considering current economic circumstances, a decision to greenlight Phase II is highly likely to be “stale” by the time funding is found. Part of this “staleness” relates to Covid-19. By all indications, many elements of society have changed, and will change further as a result of the pandemic. This includes traffic patterns, real estate development, and public recreational use, not to mention drastically lowered tax revenues. There are many significant unknowns that affect the project outcomes and make it impossible to have confidence in a decision about Phase II at this time. Much wiser is to limit the decision to Phase I and then monitor indicators to determine if Phase II is justified.

In the same vein, the additional funds needed by the local jurisdictions to complete Phase I may well be in jeopardy due to Covid-19 related economic downturn.

### **Comments on the FONSI:**

*(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

Several commentors disagreed with (in great detail) the extent, methodology, and results of the traffic studies. Because this information is at the heart of the project purpose and need as well as environmental effects, I believe that this makes a decision highly controversial. Stating in the FONSI that “none of the analyses performed for the EA yielded results that were highly controversial...” is a misstatement.

*(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

The possible effects in terms of achieving stated project goals, and predicting effects on the human environment are highly uncertain and risky. This is due to the pandemic and its substantial impact on human behaviors across all social realms. The pandemic has triggered changes in work and travel patterns that affect the need for transportation infrastructure, and has initiated startling changes in real estate development and purchasing behaviors that are affecting rural areas like Middle Verde, Camp Verde, and Cornville. In addition, a massive change in public land recreation demand and use is being reported by public land managers, as a result of the pandemic, changes that may or may not continue into the future. These changes affect the value and use of public lands (including the White Hills) and generate more or less need for public land access. The point is that we are in the middle of these changes and thus the effects are highly unknown. Making a decision on both Phases at this uncertain time seems unwise.

*(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

Ignoring the potential for induced development is putting your head in the sand. We have only to look at the SR260 for an example of induced development or an enhanced environment for development that became developed. This aspect of the project should receive further review and disclosure.

The EA states that there would be no "induced growth" resulting from this project but adds that, "this will likely enhance the value of this land, and increase its suitability for development..."(EA 4.19.5) And, "The future development in the Middle Verde area and the greater study area will be driven by the Town of Camp Verde and other Verde Valley communities, through plans and zoning, and those who own the land, through buying and selling. While the area's transportation network, including the Verde Connect road, will likely influence those actions." (EA 4.19.5) Transportation infrastructure is a key influence on development and induced growth.

The FONSI is not signed by Karla S. Petty but is signed by an unidentified Alan R. Hansen.

In summary, aspects of the EA remain inadequate and a FONSI is inappropriate.

Benefits of the construction of the Phase II north/south road through the unique White Hills are not worth the trade-offs: destroying the landscapes semi-primitive (not to mention biological) values of this area forever, in exchange for dubious future reduction in traffic congestion - analyzed under a rapidly changing Covid-19 set of social and economic circumstances. More road building is inconsistent with an enlightened approach to climate change mitigation and inconsistent with sustainable infrastructure management considering future maintenance liabilities and lowered local tax revenues.

Sincerely,



Jennifer Burns (USFS retired landscape architect)

