



June 21, 2024

Michiko Martin, Regional Forester
Reviewing Official
333 Broadway Blvd SE
Albuquerque, NM 87102

Electronic Submission via email: objections-southwestern-regional-office@usda.gov with the subject: Public Motorized Travel Management Plan

Re: Notice of objection filed pursuant to Project Level Objection Process, 36 CFR 218.8 (A) (B) (D) to draft Record of Decision and Final Environmental Impact Statement for Travel Management Planning on the Apache-Sitgreaves National Forest.

Objector's Name and Address:

The Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, AZ 85086-5000
623-942-3000

Dear Objection Reviewing Officer:

The Arizona Game and Fish Department (Department) appreciated the opportunity to work closely with the Apache-Sitgreaves National Forest (ASNF) as a cooperating agency and interdisciplinary team (ID Team) member during the development of the Final Environmental Impact Statement (FEIS) for travel management planning on the ASNF.

The Department's Objections involve issues previously submitted throughout the development of the FEIS, or based on new information or changes between the draft and final EIS. In an effort to further discuss the Department's Objections the Department requests a formal meeting with the Reviewing Officer.

OBJECTION 1: MOTOR VEHICLE USE MAPS DO NOT PROVIDE CLEAR DIRECTION TO FOREST VISITORS IN THE ABSENCE OF SIGNED ROADS

The Department continues to seek standardization of camping and travel regulations across all Arizona National Forests.

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GOVERNOR: KATIE HOBBS **COMMISSIONERS:** CHAIRMAN TODD G. GEILER, PRESCOTT | CLAY HERNANDEZ, TUCSON | MARSHA PETRIE SUE, SCOTTSDALE
JEFF BUCHANAN, PATAGONIA | JAMES E. GOUGHNOUR, PAYSON **DIRECTOR:** TY E. GRAY **DEPUTY DIRECTOR:** TOM P. FINLEY

Motor Vehicle Use Maps typically lack sufficient detail, are difficult to decipher, likely resulting in public confusion and the unintended use of closed roads. The FEIS states that some additional signage *may* be installed during implementation per policy (FEIS Volume II: Appendix A. Concern Response #114 [emphasis added]).

The ASNF must implement consistent and intuitive road signage that clearly informs users which roads are open to motorized public use, and which roads are closed.

Prior comment: The Department raised this issue in detail in its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY:

Forest Service Manual 7716.42 states:

1. An MVUM is required to implement and enforce designations under 36 CFR 212.51 and 36 CFR 261.13.
2. Administrative units should post route markers on designated routes and identification signs in designated areas as soon as practicable. Information on route markers and signs must correspond to the information shown on the corresponding MVUM.
3. Signs at major points of access to NFS lands may be installed to inform the public about designations in an administrative unit or a ranger district.

OBJECTION 2: THE DEPARTMENT REQUESTS MAPS WHICH CLEARLY DEPICT ALL AUTHORIZED ADMINISTRATIVE USE ROADS

While the ASNF has acknowledged and addressed a majority of the Department's requests for administrative access to its water catchments (FEIS Volume II, Table 3), the Department is unable to confirm that these administrative road designations have been made in its review of the Public Motorized Travel Management Plan in FEIS Volume I and II, the Alternative 2 Sitgreaves and Apache maps, and the associated *Routes Open to Administrative Use Only* tables.

The only location where these administrative roads are included is on the new Draft Public Motorized Travel Management Plan Map Book, released on May 23, 2024. This map book does not appear user-friendly; the Department is experiencing difficulties in locating and confirming that all requested administrative roads were added. Additionally, this map book was not provided until 16 days after the objection period started.

The Department requests that all changes made to administrative roads be confirmed and consistent across all resources.

VIOLATION OF LAW, REGULATION OR POLICY: The Department seeks confirmation for its administrative use of roads to wildlife water catchments and to its inholdings.

OBJECTION 3: DEPARTMENT ACCESS TO WILDLIFE WATER CATCHMENTS

The Department requires administrative access to *all* Department wildlife water catchments and *all* wildlife water catchments managed by the Department on Forest Service with access on FS Maintenance Level 1 roads, administrative roads, and all roads leading to the catchments.

The ASNF has acknowledged and addressed a majority of the Department’s requests for administrative access to catchments, FEIS Volume II, Table 3. However, the following catchments are not included in any version of the MVUM, nor are they included in the tables or maps provided in the FEIS.

Water Catchment	Administrative Use Request
Unnamed Water Catchment	Unnamed Spur Road off of FR 9484K: Leads to an unnamed wildlife water catchment along an existing road starting from 34.68944, -110.95222 to the catchment at 34.69166, -110.95611.
Capps Water Catchment	FR 9890G1ATV: The ID Team acknowledged and recommended adding the remainder of the road as an administrative use-only road to allow access; however, the maps do not display this change and the Department emphasizes the request for admin access via the existing two-track off of FR 9890G1ATV.

The Department further requires administrative access for the following water catchments. These roads should be designated as Maintenance Level-1(ML-1)/Admin Use Only roads.

Water Catchment	Administrative Use Request
Grapevine Pothole	Unnamed Spur Road off of FR 170: Leads to Grapevine Pothole along an existing spur road at 34.52001, -110.75671 to the pothole at 34.51987, -110.75641.
Wildcat Water Catchment	Unnamed Spur Road off of FR 504F: Leads to Wildcat Water Catchment along an existing spur road at 34.60713, -110.74021 to the catchment at 34.57757, -110.73131.
Long Hollow Water Catchment	Unnamed Spur Road off of FR 95A: Leads to Long Hollow Water Catchment along an existing spur road at 34.5054, -110.58048 to the catchment at 34.50399, -110.57893.
Vista Water Catchment	Unnamed Spur Road off of FR 488A: Leads to Vista Water Catchment along an existing spur road at 34.48056, -110.54745 to the catchment at 34.48043, -110.54857.
Unnamed Water Catchment	Unnamed Spur Road off of FR 5: Leads to a catchment along an existing spur road at 34.21827, -109.75673 to the catchment at 34.218281, -109.756837.

Water Catchment	Administrative Use Request
Blue Ridge Water Catchment	Unnamed Spur Road off of FR 9712G: Leads to Blue Ridge Catchment along an existing spur road at 34.15232, -109.92024 to the catchment at 34.152748, -109.920196.
Twin Knoll Water Catchment	Unnamed Spur Road off of FR 9711H: Leads to Twin Knoll Catchment along an existing spur road at 34.20882, -109.91504 to the catchment at 34.204333, -109.914401.
DeadEye Water Catchment	Unnamed Spur Road off of FR 916: Leads to DeadEye Catchment along an existing spur road at 34.38708, -110.46184 to the catchment at 34.38885, -110.46668. Or extend the admin use along FR 9886T1.
Sundown Water Catchment	Unnamed Spur Road off of FR 9886s: Leads to Sundown Catchment along an existing spur road at 34.42542, -110.44999 to the catchment at 34.42451, -110.45201.
Oklahoma Water Catchment	Unnamed Spur Road off of FR 9886B: Leads to Oklahoma Catchment along an existing spur road at 34.43612, -110.51940 to the catchment at 34.43548, -110.51920.
Hunt Water Catchment	Unnamed Spur Road off of FR 221: Leads to Hunt Catchment along an existing spur road at 34.36280, -110.24566 to the catchment at 34.36910, -110.23237.
Turkey Hill Water Catchment	Unnamed Spur Road off of FR 919: Leads to Turkey Hill Catchment along an existing spur road at 34.29310, -110.25641 to the catchment at 34.29265, -110.25618.
Park Water Catchment	Unnamed Spur Road off of FR 466: Leads to Park Catchment along an existing spur road to the catchment at 34.53215, -110.40782.
Burton Water Catchment	Unnamed Spur Road off of FR 9891L: Leads to the Burton Catchment along an existing spur road at 34.31068, -110.14255 to the catchment at 34.31236, -110.14474.
Bull Hollow Water Catchment	Unnamed Spur Road off of FR 133: Leads to the Bull Hollow Catchment along an existing spur road at 34.38354, -110.12356 to the catchment at 34.38259, -110.12615.

Prior comment: The Department raised this issue of access to its water catchments in its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: TMR 212.53 requires Forest officials to coordinate with affected State agencies. The Apache Sitgreaves Land Management Plan at 62-63 states that conservation of wildlife species is a high priority. A Guideline in the Land Management Plan states mitigations, or other measures should be incorporated to reduce negative impacts to plants, animals, and their habitats and to help provide for species needs.

OBJECTION 4: DEPARTMENT ACCESS TO ITS INHOLDINGS ON THE APACHE-SITGREAVES NATIONAL FOREST

The Department requires access to Arizona Game and Fish Commission-owned lands. Currently, there is no administrative access identified for access to the Duran parcel, part of the Commission’s Chevelon Canyon Ranches Wildlife Area.

The Department requires access to this parcel via an unnamed spur road at 34.43926, -110.87781, off 119, as an ML-1/Admin Use Only road.

Prior comment: The Department raised this issue in its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: The Forest Service shall grant appropriate access across National Forest Service lands to private and public properties and shall recognize valid existing rights. Travel Management Rule 36 C.F.R. 212.6; 36 C.F.R. § 212.55(d)(1).

OBJECTION 5: SPECIAL USE PERMIT REQUIREMENTS

The Department understands the ASNF wants the Department to file for an SUP for vehicular access to two wildlife water catchments and for vehicular access to the Department’s Tillman (and possibly the Duran parcel as well), both of which are inholdings located within the Commission’s Chevelon Canyon Ranches Wildlife Area. The two wildlife water catchments are the Black Canyon Catchment and Walnut Catchment. Well-established roads lead to both catchments and to the Tillman parcel. An old logging road leads to the Duran parcel.

Location	Administrative Use Request
Black Canyon Water Catchment	Unnamed Spur Road off of FR 488A: Leads to the Black Canyon Water Catchment along an existing road starting at 34.50760, -110.55130 to the catchment at 34.50815, -110.55040.
Walnut Water Catchment	Unnamed Spur Road off of FR 122A: Leads to the Walnut Water Catchment along an existing road at 34.405594, -110.694019 to the catchment at 34.39659, -110.70873.

Prior comment: None. This is a new issue since the Department submitted its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: SUPs are intended for noncommercial group uses and projects involving construction or installation of improvements on FS lands (e.g. buildings, sanitary systems, community residences, power plants, telephones, water projects, aircraft facilities, oil and gas pipelines, agriculture/fish hatcheries, new wildlife water catchments). Forest Service Handbook 2709.11. SUPs are subject to a lengthy FS initial and second-level screening process and environmental analysis under NEPA. 36 C.F.R. § 251.54.

SUPs are an inappropriate requirement for the use of an existing road by a state wildlife management agency. Authorization of vehicular access by the Department to its maintained catchments and inholdings can and should be authorized through designation of these access roads as Maintenance Level-1(ML-1)/Admin Use Only roads, not through SUPs.

The Travel Management Rule requires the Forest Service to grant appropriate access to private and public inholdings. 36 C.F.R. 212.6; 36 C.F.R. § 212.55(d)(1).

OBJECTION 6: MEXICAN WOLF INTERAGENCY FIELD TEAM ACCESS

The A-S Travel Management Plan should state that the Mexican Wolf Interagency Field Team (IFT) (IFT lead, biologists, technicians, range riders, United States Fish Wildlife Service personnel, and full-time Department volunteers, and Department Interns) when conducting activities such as fostering of neonatal wolf pups and related activities; capturing, releasing, translocations, and removal of wolves; end-of-year count activities; mitigation and management of wolf/livestock conflict (including monitoring cattle, locating and hazing of wolves away from cattle and areas with recent or potential wolf depredations on livestock, stocking of diversionary food caches, livestock carcass removals, deployment of fladry fencing); and management of nuisance wolf behavior. This exemption would not preclude IFT staff from the obligation to operate motor vehicles with due regard to ensure resource damage does not occur from such travel on closed roads or cross-country travel when conducting carcass removals.

Prior comment: The Department raised this issue in its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: 36 C.F.R. 212.51 exempts motor vehicle use specifically authorized by the ASNF.

OBJECTION 7: MOTORIZED ACCESS TO DISPERSED CAMPING CORRIDORS

The Department is concerned with the wording of the Draft Record of Decision (March 2024) regarding the designation of designated camping corridors. Having consistent language across all Arizona National Forests is essential in promoting public compliance with off-road dispersed camping requirements.

The Department recommends rewording the Draft Record of Decision at 4 and the FEIS, Volume I, Alternative 2 to conform to the description found in the Coconino National Forest's Dispersed Camping Guidelines:

“When dispersed camping (or "car camping") on the National Forest, refer to the designated camping corridors shown on the Motor Vehicle Use Map. In these designated corridors, visitors may drive their vehicles up to 300 feet from the road

to car camp. Also, visitors may park alongside any designated road's edge and walk to their campsite anywhere on National Forest System lands, except where specifically prohibited as indicated in closure orders. When parking along a designated road, drivers must pull off the traveled portion of the roadway to permit the safe passage of traffic. These rules only affect motor vehicle use. Forest visitors can always hike to campsites at farther distances from the roads.”

The Department also recommends including the last statement found in the FEIS - Volume I, Effects from Alternative 2 (Pg. 71) to the dispersed camping guidelines:

“...The public would continue to have the ability to camp on designated roads without designated corridors by parking alongside the road—within 30 feet of open roads (or one vehicle length)—or park and walk into a campsite if it is not within a designated dispersed camping corridor or is beyond 30 feet from the road.”

Prior Comment: None. This is a new issue since the Department submitted its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: Forest Service Policy is to “clearly” identify areas designated for motor vehicles use on an MVUM. Forest Service Manual 7716.03. To accomplish this, the MVUM must provide clear direction what vehicle use is allowed within designated camping corridors.

OBJECTION 8: NSF ROAD 475

In its October 2019 comment letter, the Department stated:

“FR 475: Existing dispersed motorized camping along FR 475 and connected spur roads would be disallowed. This is a very popular location for sportsmen to camp and access this portion of southern GMU 27. This needs to be corrected to meet existing dispersed motorized camping use.”

ASNF responded as follows: (FEIS Volume II, Table 2, p.55)

“National Forest System Road 475 is within the inventoried roadless area. There are also hydrologic concern areas with stream crossings along this road. Due to these concerns, no changes were made to the proposed action.”

Although the 475 road falls within the boundaries of the Inventoried Roadless Areas (IRA), the Roadless Area Conservation Rule limits new road construction, reconstruction, and timber harvesting in inventoried roadless areas, and does not preclude the use of existing roads in public use prior to the 2001 Rule. The Department acknowledges that there are some stream crossings on the 475 road but many of the dispersed campsites leading from FR 475 that the Department

provided to ASNF are on the tops of ridges or in locations where hydrologic concerns are not an issue.

Please also note that the FEIS Volume II, Appendix A, Concern Response #47 states “...Additional camping corridors were added to National Forest System Roads 191, 217, 475, 54, and 8463.”

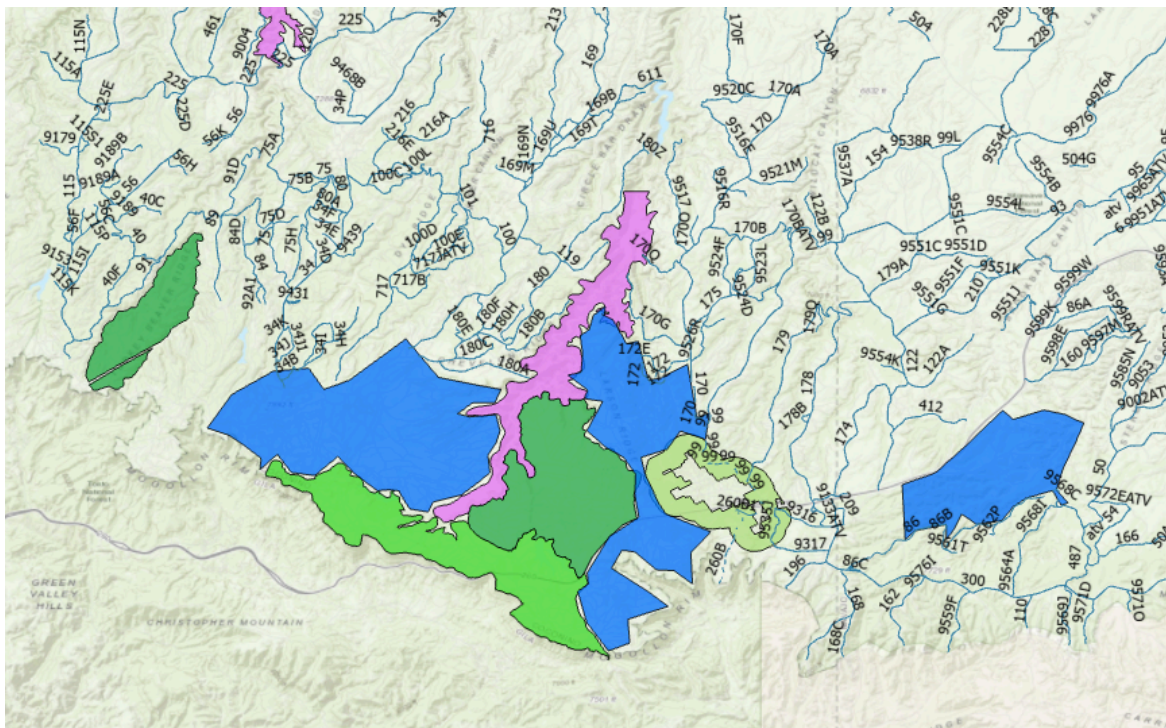
Prior Comment: The Department raised this issue in its October 29, 2019 Comments to the Revised Draft EIS.

VIOLATION OF LAW, REGULATION OR POLICY: The IRA does not preclude the public use of existing roads.

OBJECTION 9: MOTORIZED BIG GAME RETRIEVAL

The Draft Record of Decision at 4 states that motorized access for big game retrieval is not designated in designated and recommended wilderness areas, the Blue Range primitive area, areas closed to motorized use by Forest Order, and Forest Plan management areas unsuitable for motorized use (e.g., natural research areas, recommended natural areas, natural landscapes, and wildlife quiet areas).

The Department has identified several areas that do not have forest orders or other special designations that would otherwise preclude motorized big game retrieval (MBGR). These areas are depicted in the following maps in blue:



The Department requests ASNF to reconsider these areas for MBGR.

VIOLATION OF LAW, REGULATION OR POLICY: TMR 212.53 requires Forest officials to coordinate with affected State agencies.

Please contact Regional Supervisor Aaron Hartzell at ahartzell@azgfd.gov regarding this Objection Letter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Clay Crowder', with a stylized flourish at the end.

Clay Crowder
Assistant Director, Wildlife Management Division

AZGFD #M24-05071227