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First name: Steve

Last name: Saway

Organization:

Title:

Comments: July 22, 2018

533 Suffolk Dr
Sierra Vista, AZ 85635

Kerwin S. Dewberry
Forest Supervisor and Reviewing Officer
300 W. Congress St.
Tucson, AZ 85701

Dear Mr. Dewberry:

I wish to submit an objection per 36 CFR 218 to the following project: Proposed
Changes to the Santa Catalina District Motorized Travel System Project. Details are as follows:

1. The objector's name and address with telephone number if available: Steve Saway, 533 Suffolk Dr, Sierra Vista, AZ 85635, (520) 678-6572
2. A signature or other verification of authorship upon request (a scanned signature for email may be filed with the objection): See enclosure 1 for a copy of my scanned signature.
3. The name of the proposed project, the name and title of the Responsible Official, and the name of the National Forest and Ranger District on which the proposed project will be implemented:
 - a. Proposed Project: Proposed Changes to the Santa Catalina Motorized Travel System Project
 - b. Name and title of the Responsible Official: Charles Woodard, District Ranger, Santa Catalina Ranger District, Coronado National Forest
 - c. Name of the National Forest and Ranger District on which the proposed project will be implemented: Coronado National Forest, Santa Catalina Ranger District
4. A description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and a statement that demonstrates connection between prior specific written comments on the particular proposed project or activity and the content of the objection.

There are four aspects of the proposed project addressed by my objection:

- a. The District failed to consider user needs for recreation and access in the Purpose and Need for the project as required by the Travel Management Rule. (Note: this is a new issue that arose in the Final Environmental Assessment so does not relate back to my previous comments.)
- b. The District incorrectly applied the Travel Management Rule with respect to new roads and new

construction. (Note: this is a new issue that arose in the Final Environmental Assessment so does not relate back to my previous comments.)

c. The District violated the intent and scope of the Travel Management Rule with respect to establishing quiet areas. (Note: this is a new issue that arose in the Final Environmental Assessment so does not relate back to my previous comments.)

d. The District failed to consider user needs for recreation and access with respect to the following roads: 4443-extension, 7705, 36A, 4430, 4405-10.34R-1, and Hidden Spring road. I raised this issue in my August 15, 2014 comment letter (see copy at enclosure 2).

5. User Needs for Recreation and Access. In the Purpose and Need section of the Environmental Assessment (EA), the District states the following:

"The purpose and need of this project is based on the need to change management to conform to the Travel Management Rule by providing a system of roads, trails, and areas designated for motor vehicle use on the Coronado National Forest, Santa Catalina Ranger District (36 CFR 212.50) that will minimize impacts to natural and cultural resources. The proposed actions are necessary to address unacceptable resource damage created by increased motorized use across the district over the last 30 years." This statement reflects the District's narrow and biased focus on resource impacts as basis for their proposed changes to the motorized travel system. Yet, the Travel Management Rule requires a broader focus that includes consideration of user needs for recreation and access. (Note: the June 2014 version of the EA had a more balanced statement but this was changed in the final EA to eliminate any mention of providing adequate access to the public.)

In the Federal Register Notice that published the Travel Management Rule (see copy at enclosure 3), the Forest Service responded to questions. With respect to designating routes for user needs, the Forest Service stated on page 68271 the following:

"Provision of recreational opportunities and access needs are two of several criteria the responsible official must consider under § 212.55 of the final rule in designating routes for motor vehicle use."

The text of the final rule states on page 68289 the following:

"In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs,....."

The District's failure to consider user needs for recreation and access in the Purpose and Need for the project as required by the Travel Management Rule is a serious flaw that has resulted in an unfair and unbalanced application of the Travel Management Rule within the District. It has influenced the District's decisions toward closure or restriction of roads that have high recreational value.

The District's analysis of the recreational environment is similarly flawed by its biased focus on reducing opportunities for semi-primitive motorized recreation. On page 55 of the EA, the District states:

"Based on the increase in motorized use over the past several decades, the opportunity for semi-primitive non-motorized experiences has decreased, whereas the opportunities for semi-primitive motorized opportunities have increased at its expense."

In my view, this statement is clearly biased and completely false. Motorized recreational opportunities on the

District as well as on the entire Coronado National Forest has been in a general decline for the past 25 years while opportunities for non-motorized recreation continue to expand. Road closures and restrictions due to environmental concerns, etc., the declining availability of motorized trails, and mining related impacts have continued to reduce opportunities for motorized recreation. On the other hand, non-motorized trails continue to expand and provide numerous opportunities within the District, including the Arizona National Scenic Trail. Another indication of this is the recently published Revised Coronado Forest Plan. On page 98 of the Plan, a table shows the composition of the Santa Catalina Ecosystem Management Area by land use zone and management area. Of the total 260,194 acres, there are 206,781 acres in wilderness, special management areas, and wild backcountry or 79.5 percent. This is another indication that motorized recreation in the District is continuing to be unfairly reduced by land use restrictions and lack of opportunities. The declining availability of motorized access is causing the District's motorized travel system to become more congested as users compete for recreational opportunities. The District's failure to designate an adequate system of motorized trails places more demands for mixed use of a declining number of forest roads open to the public.

This biased approach to travel management is also out of sync with national Forest Service policies that emphasize efforts to get kids and their families in the forest, e.g., Discover the Forest. Opportunities to visit the forest via motorized trails or backcountry roads are important as they help connect people to their public lands. This is becoming even more important as a growing number of forest visitors are "baby boomers" who have age restricted limitations or declining health and must rely more on motorized access and recreation to enjoy the forest. Sadly, these opportunities are severely constrained in the District's travel management proposal.

The District's failure to consider the perspectives of recreational users is also reflected in Chapter 4 of the EA - Consultation and Coordination. Included in the list of organizations consulted are two environmental groups but there is no mention of recreational groups or individuals. In my view, this is another indication that the District's focus was biased and unbalanced.

Requested Remedy:

Request the District's travel management process be re-opened and opportunities provided to interested recreational user groups and individuals to consult with the District on their specific needs for motorized access and recreation. Further, that the District revise the EA to (1) clearly show the consideration of user needs in the Purpose and Need for the project, and (2) to demonstrate that proposed road changes will be re-evaluated and reflect full and fair consideration of user needs.

6. New Roads and New Construction. The District in several instances stated that the travel management process does not involve new construction of roads. This is a sharp departure from the June 2014 EA which did propose new road construction. Based on my review, the travel management rule does envision situations that require new roads and changes to existing designations. On page 68269 of the Federal Register Notice, the Forest Service provides the following statement of clarification:

"Section 212.54 of the final rule provides for revision of designations as needed to meet changing conditions. New routes may be constructed and added to the system following public involvement and site-specific environmental analysis."

Also, on page 68280, further clarification is provided as follows:

"Section 212.54 of the final rule will allow for revisions to designations to reflect changes in environmental conditions, recreation demand, and other factors identified through monitoring pursuant to § 212.57 of the final rule. These revisions may include additions to the system of designated routes, as well as route closures. New motor vehicle routes can be planned, constructed, and designated after appropriate public involvement and environmental analysis."

Presumably, this would allow the District to include in its proposal a site-specific NEPA analysis of a new road required to mitigate the impacts of an existing road that is causing resource impacts or to respond to user needs for connectors to improve the motorized travel system. It appears the District's biased and narrow focus has ruled out any consideration of new roads in this EA. Given that the District's travel management review and public involvement have been in process since 2006, it would seem appropriate that the District's final travel management EA should consider and include all known requirements for new roads. Why is the District avoiding any consideration for new roads at this time? Why kick the can down the road when these proposed changes can be considered during the travel management process? In my view, this is inefficient and unfair to the public who have seen this process drag on for more than 12 years now.

Requested Remedy:

Request the District's travel management process be re-opened and opportunities provided to interested recreational user groups and individuals to consult with the District on their specific needs for new roads and motorized trails. Further, that the District revise the EA to include analysis of new roads that were included in the June 2014 EA, i.e., 4431-reroute, 4487-extension, and 4493-extension. Ensure that these and other proposed new roads or motorized trails will be re-evaluated and receive full and fair consideration of user needs.

7. Quiet Areas. On page 68267 of the Federal Register Notice, the Forest Service has clarified the Department's policy regarding the establishment of quiet areas as follows:

"In designating trails and areas, local agency officials must consider compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors (§ 212.55(b)(5)). A system of quiet use areas established outside the designation process is unnecessary."

However, the District's EA (particularly pages 57 and 58) provides a lengthy diatribe against the noise impacts of motorized recreationists and how they create user conflicts. A more balanced discussion would demonstrate the extensive opportunities available in the District's wilderness areas for quiet recreation where motorized use is off limits. The District's motorized travel system must consider factors laid out in the travel management rule and not be distorted to create quiet areas. Yet the District appears to be creating de facto quiet areas with their proposed road closures. In Appendix D, Response to Public Comments, the District states the following concerning quiet areas:

"The modified proposed action is expected to reduce user conflicts by providing for more predictable motorized use and noise and decreased motorized use in areas to be managed for non-motorized experiences."

By establishing de facto quiet areas, the District is in violation of the travel management rule.

Requested Remedy:

Request the District's travel management process be re-opened and opportunities provided to interested recreational user groups and individuals to consult with the District on their specific needs for motorized access and recreation. Further, that the District revise the EA to (1) clearly state that establishing quiet areas is outside the intent and scope of the travel management rule, and (2) to demonstrate that proposed road closures in de facto quiet areas will be re-evaluated and reflect full and fair consideration of user needs.

8. Roads Needing Re-evaluation. In my August 15, 2014 comment letter, I cited a number of roads that are needed to improve the forest road system and to enhance recreational opportunities and public access to the national forest. The District's response reflected a bias toward closure or restriction in all cases. Notably lacking was any attempt to mitigate any resource concerns so that the public could still enjoy recreational benefits. I am asking that the following roads be re-evaluated for public use and designated as National Forest System Roads (NFSRs) open to the public and/or mitigated so that the public can still enjoy recreational benefits.

a. Route 4493-extension. In an earlier version of the EA, the District had proposed to designate and add this segment (0.75 mile) as a NFSR. I believe the District should adopt its original proposal and add this segment as a NFSR. It provides connectivity between two other NFSRs and improves the efficiency of the forest road system by allowing forest visitors to travel more directly to their destination instead of driving numerous miles out of their way. It improves the public's ability to access and enjoy the forest and creates a loop opportunity by connecting forest roads 4493 and 736. As I stated in paragraph 6 above, the travel management rule does envision the need to add new roads and the District should incorporate this proposed new road in its NEPA analysis.

b. Route 7705. The proposal would change the designation of this NFSR road (1.11 miles) from "open to all vehicles" to "restricted to administrative or permitted use only". Route 7705 has important recreational value and should be retained as "open to all vehicles" for most of its length. It provides access for a wide variety of forest users to a large portion of the forest that otherwise would have no motorized access. If the District believes that access to Dodge Tank should be restricted to the permittee only, then the last quarter mile or so of the road could be designated as "restricted to administrative or permitted use only". In other words, recommend the District mitigate resource impacts in the Dodge Tank area but don't close the entire road to the public as it has other recreational values.

c. Route 36A. The District's proposal would change the designation of this NFSR road (0.41 mile) from "open to all vehicles" to "restricted to administrative or permitted use only". This route has recreational value and should not be restricted for only the permittee's use. It provides important motorized access for Arizona Trail users who wish to hike the trail from West Spring to Molino Basin, or to conduct shuttle hikes on the Arizona Trail between West Spring and The Lake (southeast of Bellota Ranch). In addition, it has long been a designated OHV route in the Redington Pass Backcountry Touring Area and should continue to provide opportunities for motorized recreation and public access to the Arizona Trail. The public interest is best served by keeping this road open as it has recreational values beyond the proposed use for administrative access. While the District's response to comments cited concerns about an endangered species (the Lesser Long-Nosed Bat), this concern is misplaced as that species is no longer on the Threatened and Endangered Species list (this is stated on page 79 of the EA). In any event, the District should first use mitigation measures to address any concerns rather than outright closure of this road to the public.

d. Route 4430. The proposal would change the designation of this NFSR road (1.16 miles) from "open to all vehicles" to "restricted to administrative or permitted use only". This route has recreational value and should not be restricted for only the permittee's use. It provides access to a large portion of the forest that otherwise would have no motorized access. This access provides opportunities for hiking, hunting, dispersed camping, etc. In addition, it has long been a designated OHV route in the Redington Pass Backcountry Touring Area and should continue to provide opportunities for motorized recreation. So, recommend it be retained as "open to all vehicles". Regarding the District's concerns over potential impacts to the Lowland Leopard Frog, I believe that mitigation measures should be used first to address those concerns rather than outright closure of the entire road to the public, particularly since the road appears to be largely outside of sensitive sites. Arguably, mitigation measures would also be needed to avoid impacts from the permittee's use of the road.

e. Route 4405-10.34R-1. The proposal would decommission this road (1.15 miles). This route has high recreational value as it provides access to a very popular destination in Tanque Verde Canyon that has three ponds, large trees, and sites for picnicking. However, because it is located in sensitive riparian habitat, I understand the District's proposal to close it. Having said that, I believe this is a case where the District can still support the public's enjoyment of this area by establishing a short spur road or pullout area on or near route 4426 so people can park and walk to the ponds. If this is considered a new road or new construction, it can still be incorporated in this NEPA analysis as I have pointed out in paragraph 6 above.

f. Hidden Spring. This route pre-dates the wilderness designation and has a long history of providing access to Hidden Spring, Chimney Canyon, and a large portion of the forest. However, if the boundaries of the Congressionally designated Rincon Wilderness did not exclude or cherry-stem this road, then I understand why the District is proposing to close it. But if the road was cherry-stemmed, it should be open to the public as it provides unique access to the southern portion of the Rincon Wilderness for a wide variety of forest users, including hikers, hunters, equestrians, campers, etc. If the road inside the wilderness is not cherry-stemmed, then I suggest the District retain the non-wilderness portion of this road as open to the public up to the wilderness boundary and then close it at that point. This would allow public access along the portion that lies inside the forest boundary but outside of the wilderness.

Thank you for the opportunity to submit these comments. I look forward to working with the Santa Catalina Ranger District and Supervisor's Office as this process continues.

Sincerely,
//signed//
Steve Saway

Enclosures:

1. Scanned Image of Steve Saway Signature
2. Comment Letter dated August 15, 2014, Re: Draft Environmental Assessment for Proposed Changes To Motorized Transportation System, Santa Catalina Ranger District
3. Federal Register Notice, dated November 9, 2005