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Comments: The Eastern Arizona Counties Organization consists of six counties located in northern and eastern Arizona along the Mogollon Rim that marks the southern edge of the Colorado Plateau. These six counties are Apache, Cochise, Gila, Graham, Greenlee, and Navajo County.

The Eastern Arizona Counties Organization (ECO) and its county members have been actively involved and have assumed a leadership role in several forest restoration efforts that have gained national recognition such as the White Mountain Stewardship Project and the Four Forest Restoration Initiative.

As hosting or neighboring counties to the Apache-Sitgreaves National Forests (A/S), five of the ECO counties are directly impacted by the Apache-Sitgreaves National Forests Public Motorized Travel Management Plan. These are Apache, Gila, Graham, Greenlee, and Navajo County.

In March 2016, the Eastern Arizona Counties Organization accepted the invitation of the Apache-Sitgreaves National Forests to become a Cooperating Agency for the Apache-Sitgreaves National Forests Public Motorized Travel Management Plan.

During 2016, 2017 and 2018 the Eastern Arizona Counties Organization participated in a number of Interdisciplinary Team (IDT) meetings and brought to the attention of the IDT members and Forests leaders the following local governments concerns:

1) Retention of adequate motorized road travel in the Apache-Sitgreaves National Forests.

2) Retention of motorized dispersed camping consistent with the reasonable enjoyment of safety, privacy, comfort, custom and culture, allowing the parking of motorized vehicles and/or trailers at a distance of 300 feet from the closest legally open road or trail, including access to dispersed camping sites previously used and established in the local custom and culture as demonstrated by tangibles evidences of previous use such as fire pits, improvements, etc.

3) Retention of motorized big game retrieval for all species of game meeting the definition of [lsquo]big game[rsquo] in the Arizona Game and Fish Department hunting regulations, allowing one trip each way from the downed animal to the closest legally open road or trail, regardless of distance, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.

4) Retention of motorized dispersed collection of firewood in the authorized firewood collection areas, compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.

5) Implementation of appropriate restrictions on indiscriminate cross-country travel in order to preserve and conserve the resources contained in the Apache-Sitgreaves National Forests for the enjoyment of future generations.

6) Retention of the possibility for future consideration of new motorized recreation areas and trails over at least 75% of the Apache-Sitgreaves National Forests.

Following vigorous discussions in the Interdisciplinary Team and with the Apache-Sitgreaves National Forests leadership, the Eastern Arizona Counties Organization is providing the following comments on the draft environmental impact statement (DEIS) for the Apache-Sitgreaves National Forests Public Motorized Travel

Management Plan.

Travel Management Plan and Forest Plan NEPA processes inadequacies and insufficiencies

Travel management planning for the Apache-Sitgreaves National Forests started in 2005 and included extensive public and local governments involvement from 2005 to 2008. A DEIS was released for public comments in October 2010. Shortly after the comment period ended, the Wallow Fire burned through the Apache-Sitgreaves National Forests from May 29, 2011 to July 8, 2011. The Travel Management Rule (TMR) was put on hold. Thereafter, the Forest Service decided to prioritize the completion of the Apache-Sitgreaves National Forests Land Management Plan revision. A Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan was published for comments in February 2013, and in October 2015 the revised Land Management Plan

for the Apache-Sitgreaves National Forests (Forest Plan) was implemented. Subsequently, in February 2016, the Apache-Sitgreaves National Forests resumed the Travel Management Rule planning process.

One of the outcomes of the five year TMR process interruption and its postponing to complete the revision of the Forest Plan was the creation of some confusion between the two processes, and insufficiencies in both processes.

The Apache-Sitgreaves National Forests answer to constituents[rsquo] comments on motorized access issues during the revision of the A/S Forest Plan, including Arizona Game & Fish Department (AGFD) and ECO comments, among others, indicated, in substance, that the Forest Plan revision process was not the proper forum to address travel management issues; that the TMR process would resume subsequent to the completion of the Forest Plan revision; and, that travel management issues would be addressed during the TMR process. ECO, like other constituents, accepted this answer in good faith and postponed action on travel management issues.

However, cooperating agencies such as ECO and AGFD represented in the TMR IDT were subsequently told in 2017 that a number of their concerns with the TMR implementation analysis cannot be addressed because directions were established under the revised Forest Plan that cannot be modified now to accommodate ECO or AGFD TMR concerns.

In effect, this situation resulted in the denial of the ability of cooperating agencies, State agencies and coordinating local governments to comment on, and participate effectively in the TMR process.

While ECO appreciates that these issues predate the current Forests Leadership and we do not believe that this situation was intended by the A/S, it nonetheless resulted in NEPA processes inadequacies and insufficiencies. Comments related to TMR that may require changes not compliant with the revised Land Management Plan (Forest Plan) must now be considered by the A/S, even if such changes may require a Forest Plan amendment.

Impact of Natural Landscape areas designation in the Forest Plan

The 2015 revision of the A/S Forest Plan saw the designation of large "Natural Landscape" areas, especially in the Clifton District. These areas, like all other Forest Service special designation areas, carry a number of multiple use restrictions.

For example, based on the statements made by the IDT members and the Forest leadership, a Natural Landscape designation in the Forest Plan prevents the A/S from:

* [bull] creating "new roads" (i.e. entering into the administrative system well established, long existing physical

roads);
* [bull] designating camping areas in specific locations long-used by recreationists, as documented in the AGFD and the A/S field surveys;
* [bull] designating camping corridors;
* [bull] allowing motorized big game retrieval;
* [bull] allowing motorized firewood collection.

ECO observes that there is no federal definition or designation of "Natural Landscape" and that the designation of new Natural Landscape areas in a number of areas already containing large numbers of Inventoried Roadless Areas (IRA) results in limiting beyond any reasonable justification, the recreational use of considerable areas of the A/S, especially in the Clifton District.

Had the A/S considered travel management impacts, and accepted travel management input, during the Forest Plan revision, such Natural Landscape area designations would have been vigorously challenged by a number of multiple use constituents, including ECO. The deferment by A/S of travel management impact considerations to the TMR process in effect resulted in the unchallenged designation of a number of Natural Landscape areas that now prove an unreasonable constraint on the TMR process.

While ECO understands that this is likely an unintended consequence of leadership succession and shifting leadership perspectives at the A/S and in Region 3, the constraining effect of Natural Landscape areas designation must nonetheless be corrected to allow:

the designation of "new" roads (i.e. entering into the administrative system well established, long existing physical roads);

the location of approved camping sites;

the designation of camping corridors;

the allowing of motorized big game retrieval;

the designation of motorized firewood collection areas;

even if such actions may require a Forest Plan amendment.

DEIS Range of Alternatives

Although three NEPA Alternatives are technically considered in the analysis resulting in the DEIS, the A/S stated in its Notice of Intent that it will essentially consider two Alternatives in the DEIS: Alternative 2 and Alternative 3.

The Eastern Arizona Counties Organization believes that the DEIS fails the NEPA requirement of a "reasonable range of Alternatives" because both Alternatives 2 and 3 are inappropriately restrictive in terms of motorized big game retrieval and motorized dispersed camping. In fact, the NEPA analysis and DEIS patently lack an Alternative that would allow motorized access and multiple use compatible with the maximum enjoyment of the forests by lawful hunting and camping recreationists, while still meeting the requirements of the national TMR guidelines.

Under a further restrictive interpretation of an already questionable Forest Service instruction to designate camping corridors, camping sites, open roads, etc. "sparingly," the Apache-Sitgreaves National Forests appear to have conducted the TMR designations for open road, open camping sites, big game retrieval areas, etc. under the overarching philosophy that the default answer to proposed open designations must be "no," unless there is a

mandatory reason to say "yes."

ECO recognizes that there are many miles of existing roads (whether inventoried in the A/S system, or not) around which the designation of camping corridors, approved camping sites, authorized motorized big game retrieval, etc. is inappropriate for a number of valid reasons, such as riparian resource protection, aquatic resource protection, cultural resource protection, soil resource protection, etc. or, in many cases, sheer common sense owing to topography and the physical impossibility to leave existing roads (whether inventoried in the A/S system, or not). Therefore, ECO does not seek or recommend a blanket designation of camping corridors, camping sites, or motorized big game retrieval areas around all existing roads (whether inventoried in the A/S system, or not), regardless of resources or topography.

However, ECO believes that the overarching philosophy guiding the TMR should be that the default answer to proposed open designations must be "yes," unless there is compelling reason, such as illustrated in the above paragraph, to say "no." The intent of the national regulator was to restrict

destructive cross country motorized travel, not to prevent lawful travel on, or camping along established roads.

ECO further believes that the application of a permissive overarching philosophy would still result in the A/S meeting the Forest Service instruction to "designate sparingly" open roads or open camping areas, when comparing the overall acreage of designated open areas and mileage of open roads to the overall acreage of the A/S and the overall total of all existing road miles (whether inventoried in the A/S system, or not).

In consequence, ECO requests that an additional Alternative be analyzed, based on the systematic designation of camping corridors on all appropriate roads, designation of all existing camping sites, allowing of all species of big game retrieval, designation of numerous exiting physical roads as open roads, incorporation of existing physical roads in the Forest Service inventory of roads (i.e. the administrative "creation of new roads"), etc. unless specific ecological reasons or resources at risk exist - separate from an administrative guidance to "designate sparingly".

This Alternative would still be fundamentally different from Alternative 1 in as much as it would prohibit cross country travel, as required under the national Travel Management Rule.

ECO understands that the Forest Service is mandated to analyze an Alternative proposed by coordinating local governments, and we request to be included in the designation and analysis work of the IDT.

Prohibition of administrative inventorying of existing roads (i.e. "creation of new roads"), closed roads and decommissioned roads

The definition of "new road" in the TMR process is an administrative definition whereas any physically existing road on the landscape that is currently not inventoried in the Forest Service system is considered "new," even though it may have existed on the ground and been used consistently by forest users for decades.

While this definition may make sense from an administrative perspective, it is intuitively confusing as most people understand the concept of "new road" as "road newly constructed or to be constructed."

More importantly, this "new road" definition is drastically limiting the TMR process in as much as a Forest Service determination that no "new road" is allowed in Natural Landscapes and Apache trout 6th code watersheds, will result in fact in the closing of a large number of existing physical roads which are not inventoried in the Forest Service system. If a road physically exists, but is not listed in the Forest Service inventory, it automatically becomes an illegal road under TMR even though it may have been in popular use for decades!

In addition, through the years and the projects, a large number of roads were created, frequently but not always for timber management objectives, and some of these roads have been administratively closed or decommissioned, but many of the closed or decommissioned roads have not been physically obliterated, and have therefore become part of the public experience for decades. Evidences are easily provided by the comparison of Forest Service maps from various decades, featuring numbered Forest Service roads on older maps that do not exist anymore on recent maps, but that still exist on the ground, and continue to be used by the public. All of these previously closed or decommissioned roads

also automatically become illegal roads under TMR even though they may have been in popular use for decades!

The closing under TMR of existing roads that have never been entered in the Forest Service system and the closing of former Forest Service closed or decommissioned roads will have a significant adverse impact on balanced multiple use of the Apache-Sitgreaves National Forests. These closings render the Alternative 2 statement of "553 miles currently open roads closed to the public" deeply misleading, as the actual mileage of physical roads closed to the public will likely exceed 3,500 miles including the 553 miles of administratively inventoried roads that will be closed, but also including approximately 3,000 miles of roads that are not inventoried in the Forest Service system, and that "do not exist" administratively but that exist physically and that will be closed too.

From this perspective, the total mileage of physical roads in the A/S is not 3,400 miles, as administratively inventoried in Alternative 1, but close to 7,000 miles of on-the-ground roads. Alternative 2 would essentially close approximately 60% of the roads since only approximately 3,000 miles would remain open.

ECO understands that the Forests Service only considers their system roads in their travel management signage and designations, but the impact of the TMR decision is not limited to the administratively inventoried roads. Since the roads that were never inventoried, or were closed, or were decommissioned, etc. generally still exist and will also be made illegal under the TMR decision, the impact analysis on recreation activities and their economic impact must be conducted based on the closing of ~3,500 miles of existing roads, and not just on the closing of ~550 miles of inventoried roads. In this respect, the impact analysis of the DEIS is insufficient and must be completely redone.

ECO requests that all well-established, long existing and commonly used physical roads must be inventoried and added to the Forest Service system in order to ground the TMR process in reality, prior to any impact analysis being completed and prior to any decision regarding which ones will remain open and which ones can be closed, even if such additions may require a Forest Plan amendment.

Off Highway Vehicles (OHV) recreational use

The closing of ~3,500 miles of existing roads, or approximately 60% of the existing roads, will likely have a severe impact on the multiple use of the Forests by Off Highway Vehicles (OHV) recreational users.

The impact of the TMR on OHV users, and the subsequent economic impact on the rural recreation economy, must therefore be analyzed not in consideration of just the closing of ~550 miles of inventoried roads, but in consideration of the closing of ~3,500 miles of existing roads.

Further, the regulatory purpose of the TMR is to eliminate the destruction of resources through indiscriminate cross country travel, without unduly limiting the legal and beneficial multiple use of the forest by law abiding citizens. Closing 60% of existing roads, which are identified as "cross country travel" only administratively, but not in the on-the-ground reality, unnecessarily reduces recreational multiple use opportunities, without contributing to eliminating true cross-country travel. The proposed decision is therefore arbitrary and capricious.

In consequence, ECO requests that an additional Alternative be analyzed, that include the retention of most of the ~3,500 miles of existing roads considered for closure, unless specific ecological reasons or resources at risk exist - separate from an administrative guidance to [ldquo]designate sparingly[rdquo] unmaintained roads or motorized trails.

Motorized Dispersed Camping

The field surveys and resulting proposed designations of approved camping sites and camping corridors by the various Apache-Sitgreaves National Forests Districts staff appear to ECO to be an empirical process conducted in good faith by the Forest Service personnel but lacking in several respects.

Specifically:
a. Camping corridor proposed designations were based on field survey identification of areas showing evidence of high camping frequency and high camping density. While ECO does not challenge the fact that these are two valid criteria in such designation proposals, we would also like to emphasize the fact that many recreationists are seeking low frequentation areas for a more natural and more private camping experience. Limiting proposed designations to high frequency, high density areas would therefore discriminate unduly against campers seeking the opposite experience. This must be corrected.

b. Existing camping sites located during A/S field surveys and proposed for approval under the TMR, exclude existing undeveloped sites located within a certain distance of Forest Service developed camping sites. While ECO understands the logic of attempting to not duplicate the impact of developed camping sites, we observe that the multiplication of undeveloped camping sites in close proximity to developed camping sites has likely been caused by the full occupancy of the developed sites and their inability to accommodate all interested campers. Excluding in the proposed approved sites designation the undeveloped sites in proximity to developed sites would therefore discriminate unduly against campers seeking camping space beside developed sites being filled to capacity. This must be corrected.

The Arizona Game & Fish Department (AGFD), a cooperating agency in the TMR process, conducted a field survey that inventoried 2,702 existing campsites, of which 2,648 fall under the TMR process.

Under Alternative 2, a full 1,012 existing camping sites in common use would become illegal. In other words, the Apache-Sitgreaves National Forests would lose approximately 40% of its camping sites.

Of these, 80 campsites would be disallowed due to Natural Landscape designations alone, 54 of which in the Clifton District alone.

The restrictions proposed on motorized dispersed camping will result in a shortage of campsites and will affect the ability of lawful forest users to recreate (camping, hunting, fishing, boating, etc.) in the Apache-Sitgreaves National Forests. This will consequently affect negatively the rural recreation economy and the popular support for public lands in the West.
Such negative impacts have not been analyzed in the DEIS and must be analyzed and disclosed.

Further, to mitigate these impacts, ECO requests that:

I. A 300 foot motorized dispersed camping corridor be allowed on each side of ALL open roads where topography allows and threatened resources (riparian, etc.) are not endangered, including within designated Natural Landscape areas, even if such additions may require a Forest Plan amendment;

II. All existing camp sites inventoried by the Forest Service and AGFD be allowed, and the spur roads leading to them remain open, where threatened resources (riparian, etc.) are not endangered, including:

a. within designated Natural Landscape areas, specifically in the Clifton Ranger District along FS roads 475 and 217;
b. adjacent the Blue Range Primitive Area (BRPA);
c. in the private land inholdings acquired in the BRPA after September 3, 1964 (36 CFR S 293.17).

Motorized Big Game Retrieval

In its original October 2010 TMR DEIS, the Apache-Sitgreaves National Forests Preferred Alternative proposed motorized big game retrieval for elk, mule deer and black bear.

ECO understands that the Regional leadership has required the Apache-Sitgreaves National to now limit proposed motorized big game retrieval to elk only. This decision is arbitrary and capricious. There is no requirement in the national Travel Management Rule to restrict the species allowed for motorized big game retrieval.

Further, this decision discriminates against hunters physically challenged to retrieve mule deer or black bear in the course of a legal hunt.

If achieving regional consistency with other Forest Service lands in Arizona is the goal, consistency can be easily achieved by allowing motorized big game retrieval of legally tagged bison, elk, mule deer, white-tailed deer, black bear, etc. where they occur in Forest Service lands in Arizona.

In consequence, and as indicated above, ECO requests that an additional Alternative be analyzed, that allows for motorized big game retrieval of legally tagged elk, mule deer, white-tailed deer and black bear in the Apache-Sitgreaves National Forests, in a one mile corridor on each side of all roads legally open to public motorized use during, and for 24 hours after, an open hunting season, including within designated Natural Landscape areas, and specifically in the Clifton Ranger District along FS roads 475 and 217 where topography allows.

Actually, language including all big game species as identified by AGFD (bighorn sheep, elk, mule deer, white-tailed deer, antelope, bison, bear, javelina and mountain lion - with the likely exemption of turkey), where they occur in National Forest in Arizona, would be appropriate in all Arizona National Forests Travel Management Plans, in order to insure consistency.

ECO understands that the Forest Service is mandated to analyze an Alternative proposed by coordinating local governments, and we request to be included in the designation and analysis work of the IDT.

In summary, ECO believes that the application of the TMR was never intended by the national legislators and/or regulators to result in an unreasonable curtailing of multiple use (60% of existing roads closed, 40% of existing campsites closed, elimination of all but one species from big game retrieval), or in unnecessary limitations of how the people can enjoy its public lands.

There is no national legal or regulatory TMR framework that would prevent the motorized retrieval of all appropriate species of big game, 1 mile from each side of all existing roads, and there is no national legal or regulatory TMR framework that would prevent the designation of 300 ft camping corridors on each side of all existing roads, where topography and the absence of values at risk would allow it. Further, there is no national legal or regulatory TMR framework that would prevent either in so-called Natural Landscape areas.

ECO, therefore, urges the A/S to meet the intent of the TMR to eliminate wonton destruction of resources through indiscriminate cross country travel, without unduly limiting the legal and beneficial multiple use of the forest by law abiding citizens, and without creating unacceptable negative economic impacts on the recreation economy

that is a large, if not the largest, economic driver in many of the rural counties in which the A/S is located.

ECO respectfully requests that the Apache-Sitgreaves National Forests Draft Environmental Impact Statement for Public Motorized Travel Management Plan #22692 be modified, and its impact re-analyzed, per the above comments.