Data Submitted (UTC 11): 10/21/2019 11:00:00 AM First name: Don Last name: Hoffman Organization: White Mountain Conservation League Title: Board Director Comments: Hello Jeanie, et al,

I appreciate your response. However, I would like to clarify my request, as well as ask some additional questions.

1. In 2009 I commented on the original Draft Travel Management EIS, and specifically asked that the Forest comply with the National Roadless Area Conservation Rule and to not proposed dispersed motorized camping corridors adjacent to any of the Inventoried Roadless Areas (IRAs) Such a decision would basically permit user-created routes naturally associated with the 300 foot dispersed camping corridors to penetrate the IRAs. The final Roadless Area Conservation Rule published in 2001 clearly prohibits road construction and reconstruction on all IRAs including those on the ASNF. I fully expected that the analysis would evaluate and display such illegal impacts in all alternatives.

2. In your email (dated October 11th) you indicated that the analysis of impacts of dispersed camping corridors as related to the Inventoried Roadless Areas on the ASNF were contained in the "Effects to Recreation, Designated Areas, and Wild and Scenic Rivers" beginning on page 39. I have read and re-read this section multiple times and there is no mention of the effects of motorized camping corridors on the IRAs. Page 64 does provide a chart that depicts the amount of motorized routes in IRAs but there is no mention as to whether they are new, recent or unclassified (unauthorized) routes as opposed to historic classified routes. Also the 3 Alternative maps do not even display the ASNF IRAs making it impossible to accurately identify if, where and how the proposed motorized camping corridors or existing motorized routes impact the IRAs.

3. Under the heading of Effects from Alternative 2 and 3 (pages 92, 93 and 96) the effects of "dispersed motorized camping corridors" are discussed, but there is no mention of as to if, where or how they may impact the IRAs. Once again the three Alternative Maps are not useful regarding my concerns as they do not display IRA boundaries.

4. Although there are sections that discuss the "designation of new roads" and previously "unauthorized routes" there is no discussion as to if, where and how those particular routes affect the IRAs. Again, if the Alternative Maps depicted the IRAs it would be very helpful in identifying and evaluating those impacts to IRAs.

5. I appreciate that you provided me to a link that does if fact depict the polygon shapes of the existing IRAs on the ASNF. However that map did not display any roads (existing, proposed, unauthorized, dispersed motorized camping corridors, etc) making it equally ineffective useless regarding my interests and concerns. I actually generally know where all of the IRA boundaries are, but I need to have them accurately displayed along

with the proposed roads and dispersed motorized camping corridors. I must add that it is quite disturbing that the map you referred me to indicated (per the map legend) that nearly all of the IRAs on the ASNF permit for the construction and reconstruction of roads within them. This, of course, is highly incorrect as is stated on page 57 of the Revised DEIS This map was updated in 2006 - long after the 2001 publishing of the Roadless Area Conservation Final Rule. I suspect this is very confusing and misleading to your many resource managers who require accurate information regarding the management requirements affecting the vast IRAs on the ASNF. So please update the legend and color coding on this particular GIS layer in order to update your resource files and to ensure that the ASNF complies with the Roadless Area Conservation Rule.

In 2009 I provided comments to the initial DEIS indicating that the ASNF was out of compliance with the Roadless Area Conservation Rule by proposing dispersed motorized camping corridors adjacent to IRAs. On page 123 of the RDEIS Volume 2 my specific comments are address in narrative form, and I remain disturbed that there are 300' motorized camping corridors proposed adjacent to IRAs. Additionally, since the IRAs are not portrayed on the Alternative maps I am unable to determine if other roads and other dispersed motorized camping corridors are impacting the many other IRAs across the ASNF. So again please have you GIS shop produce at map that will accurately depict the IRA boundaries along with the proposed roads and proposed motorized camping corridors.

On September 5th, shortly after the RDEIS was published, I responded the ASNF webpage for the Travel Management Plan and requested a hard copy of the document. On September 6th I received an auto-response indicating a hard copy would be sent and thanking me for my interest. Over a week passed, so I called the ASNF Supervisor's office and was referred to a Mr. Tim Gilloon who was not in the office. The Receptionist (I believed named Andrea) said she would write him a message with my request since his voice mail hadn't been set up. Another week passed so I called Mr. Gilloon. He was apologetic, and he promised he would mail the document. He also indicated that he wasn't certain if there was staff available to create the maps that included the IRAs. Nine days later I received the RDEIS, but it did not include any maps at all. I called the Supervisor's office again and this time I was referred to Mr. Steve Johnson, and he indicated that he would look into creating the maps I requested. On October 11th I received and email from Jeanie O'Conner (of Bozeman, MT) which provided the link to the afore mentioned faulty ASNF map with IRA boundaries. She indicated that the Forest would not produce any additional maps, but further down in the email encouraged me to ask for additional maps or informational via the planning website, and also suggested that I visit the ASNF Supervisor's office to view additional maps. This is all a bit confusing.

At this point I am obviously a bit frustrated, and of course time is short with the October deadline for comments looming. I understand that this week the ASNF is hosting additional public open houses that will apparently disclose additional information. Hopefully the new information includes the alternative maps with the IRA boundaries which I have persistently requested. I will attend the meeting in Alpine. I will need the information that I am requesting by Wednesday, October 23rd, in order to prepare and submit timely comments that I believe you will find relevant and useful. If that is not possible I recommend that the ASNF extend the comment period for an additional month.

In closing, please don't surmise that that I have a strong negative opinion of the RDEIS. I am very satisfied with much of the analysis and I look forward to having the ASNF implement its initial Forest Travel Management Plan.

The Roadless Area Conservation Rule is obviously a long-time and primary concern for me and the organizations I represent. I look forward to seeing you at the open house meeting this week.

Also please be sure to include this email with the official public comments for the this project. Thank you.

Sincerely,

Don Hoffman

Board Director, White Mountain Conservation League

Board Director, Wild Arizona (formerly Arizona Wilderness Coalition