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First name: John
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Organization: Theodore Roosevelt Conservation Partnership
Title: Southwest Field Manager
Comments: Dear Mr. Bosworth:

The Theodore Roosevelt Conservation Partnership (TRCP) appreciates the opportunity to continue working with the Forest Service (FS) in the Tonto National Forest (TNF) as it proceeds with a full Land Management Plan revision.

The TRCP is a national non-profit sportsmen's conservation organization working to guarantee all Americans quality places to hunt and fish. The TRCP works with our 60 formal partners and represents over 100,000 individual members nationally and nearly 2,800 individuals throughout the state of Arizona. The TNF's location and size make it a unique and important forest. It provides resources and recreation for a large population base and the related pressures create a need for well thought through planning, implementation, and monitoring. Given the increasing demands on public land throughout the West, the future management of the TNF is of great interest to us, our partners, and Arizona sportsmen as the area is renowned for world-class hunting.

Because the TNF is one of the first forest plans proceeding under the direction of the 2012 Forest Planning Rule, it is crucial that the plan results in a balanced approach that represents the interests of those that depend on the forest. Up to this point, we would like to commend the FS for their efforts in instituting this planning rule, including the opportunity for more public engagement throughout the planning process. Increased public engagement is a good step towards recognizing issues and developing alternatives that will benefit hunting, fishing, and fish and wildlife habitat and could help lead to balanced multiple uses in the area analyzed.

There are a diverse number of issues relevant to our sportsman constituents and these comments intend to convey that sentiment in a way consistent with the framework of the planning process. These comments offer what we believe are reasonable changes and/or additions that are backed up by science and generally supported by hunters and anglers. Within the boundaries of the TNF are a great multitude of resources valued by hunters and anglers, including healthy populations of mule deer, Coues deer, Rocky Mountain bighorn sheep, desert bighorn sheep, elk, black bear, javelina, turkey, multiple species of quail, and a great diversity of habitats and other life that support these populations cherished by hunters and anglers and also enjoyed by wildlife watchers, photographers, and other recreationists.

In addition to the inherent value the plants, animals, and their habitats offer to the public, the forest is a significant economic driver that, with proper management, can be maintained indefinitely. Every year, the outdoor recreation economy generates $887 billion in consumer spending, $65.3 billion in federal tax revenue, $59.2 billion in state and local tax revenue, and sustains 7.6 million American jobs. Each year in Arizona, outdoor recreation generates $1.36 billion in consumer spending, $787 million in state and local tax revenue, and 104,000 jobs with $3.3 billion in in wages and salaries. Hunting and fishing in Arizona during 2001 generated $1.34 billion in expenditures, $58 million in state tax revenue, and supported over 17,000 jobs with $314 million in wages.

2012 Forest Planning Rule

As mentioned, the TNF plan revision process is one of the first in the country to proceed under the direction of the 2012 forest planning rule and will certainly be used as a model for other forest plan revisions across the country. The TRCP and several sporting organizations from across the country were engaged throughout the 2012 rule-making process and offered significant public comment on the new planning rule. Some key points that were conveyed during that process, and are relevant here, are as follows:

? Require forest plans to include multiple-use plan components that show how they will provide habitat conditions for relatively common species such as deer, elk, grouse, and trout that are enjoyed and used by the public. Such provisions should be consistent with species population objectives set by state fish and wildlife agencies.

? Require forest plans to ensure that healthy populations of fish and wildlife are sustained and distributed throughout each forest, consistent with the habitat.

? Create a standard 100-foot minimum default development buffer for streams, lakes and rivers that assures the conservation of watersheds important to fisheries and anglers.

? Require that commercial timber cutting in areas identified as suitable for timber production sustains the long-term health and productivity of the land and benefits fish and wildlife.

? Mandate the use of best-available science in planning, management, and monitoring.

? Require cooperation with state fish and wildlife agencies when designing and implementing land-use plans, on-the-ground management activities, monitoring, and survey design.

? Require planning for desirable nonnative species that are recreationally and economically important, such as brown trout and ring-necked pheasants, where compatible with native species.

? Provide multiple-use language for sustainable cultural and historic uses such as hunting, fishing, trapping, and horse packing.

In addition to these more specific recommendations, the TRCP and its partners generally agreed with the planning rule's focus on ecological integrity and sustainability of terrestrial and aquatic ecosystems, social and economic sustainability, robust adaptive management, maintaining long-term benefits to habitats for fish and wildlife, and maintaining opportunities for a variety of recreation opportunities, including primitive and semi-primitive hunting and fishing.

Overall, we feel the FS did well incorporating the principles and direction mandated in the final planning rule. Below, we discuss some topline issues within the sporting community, as related to the Need for Change and Proposed Actions.

Habitat Management

The TNF holds a number of game species that are enjoyed and used by the public and are important in maintaining economic activity on the forest. Of those, elk, mule deer, Rocky Mountain bighorn sheep, and desert bighorn sheep should have the highest priority due to their populations being sensitive to changes in their habitats. For this reason, we ask that special attention be placed on these species.

Elk

Of these species, only elk are included on the Regional Forester's list of Species of Conservation Concern as an indicator species for the TNF.

While elk populations are stable in the TNF, they are highly valued by sportsmen so working with Arizona Game and Fish Department (AZGFD) to maintain population and herd composition goals should remain a focus for the TNF.

Mule deer

Mule deer are not included on the list of Species of Conservation Concern for the TNF. We ask that the Regional Forester and Forest Supervisor place mule deer on this list.

Although mule deer populations are relatively stable in the TNF, their documented decline across many Western states shows the need to get ahead of problems in areas where mule deer populations have been stable, and to take measures to, at the least, maintain population levels, while making an effort to increase populations and improve herd composition where wildlife professionals, including AZGFD, feel that an area may be capable of supporting more deer through various management measures.

Bighorn sheep

Neither sub-species of bighorn sheep are recognized as Species of Conservation Concern. Management of areas for the long-term security of bighorn sheep should be identified and prioritized due to the vulnerability of wild sheep to introduced diseases. While potential interaction between domestic sheep and wild bighorn sheep populations is continually monitored, protocol should be established to ensure no future interaction. All actions to prevent such interactions must be based on the best available science and circumstances on the ground.

Management Areas and Habitat

As recognized in the management area for deer, elk, and sheep important ranges, seasonal habitats are crucial for maintaining populations commensurate with AZGFD population objectives. We also recommend that other important habitats recognized by AZGFD for deer, elk, and sheep be considered in the TNF plan. Habitat delineations that we recommend for inclusion are below:

? Elk: migration corridors, migration patterns, production areas, summer concentration areas, and all winter ranges.

? Mule deer: concentration areas, migration corridors, migration patterns, summer ranges, and all winter ranges.

? Bighorn sheep: concentration areas, any migration patterns, perennial water sources, and all seasonal ranges.

Other Socially and Economically Important Species

We recommend that other important species that are enjoyed by the public be given a broad-scale management direction with a goal to maintain these populations and their habitat indefinitely. Species include black bear, quail, and wild turkey.

Fisheries and Aquatic Resources

The TNF provides some of the most storied and productive native cold-water fisheries in Arizona including habitat for Gila trout and also provides important warm-water fisheries that serve Arizona sportsmen in the Verde, the Salt, and other drainages. These are some of the most important recreational fisheries in the southwest.

These outstanding fishing opportunities throughout the forest for a range of species (both native and non-native) have a significant impact on local economies. Substantial research shows that the health of most game-fish populations is dependent on healthy watersheds, aquatic habitats, and sufficient riparian vegetation to maintain a properly functioning ecosystem. In general, fisheries are healthy in the TNF. We appreciate the goals for maintaining water and aquatic resources in the proposed action but recommend the inclusion of a goal to maintain high-quality fisheries, with the preference for conserving and maintaining natural fish habitat., including:

? Manage the cold-water fisheries on the TNF for both recreational fishing and native trout recovery.

? Coordinate with the AZGFD on restoration projects to build Arizona into a destination area for trout fishing and strengthen the populations of the native Gila trout to one day be a recreational sport fish.

? When conducting restoration projects for recreational fishing and native trout recovery please refer to the AZGFD's cold-water fisheries plan and have aligned management practices.

? New or reconstructed roads and motorized routes should not be located within 500 feet of intermittent and perennial water features, except where necessary for stream crossings or to provide for resource protection to avoid the long-term adverse impacts such as sedimentation from OHV and vehicle use.

Coordination with Arizona Game and Fish Department

As mentioned, the 2012 planning rule requires the forest to coordinate with state and local wildlife management agencies. Coordination between the FS and AZGFD has been sufficient and we encourage continued coordination with AZGFD on species and habitat management. It is especially important that population objectives set by AZGFD for species discussed here are honored through coordinated management practices that restore, maintain, and enhance these populations and their habitats.

Importance of Access

Although we are at a point in the planning process that does not address travel management, we want to express the importance of retaining access for recreation where agreed upon through a public process. We encourage the FS to consider reasonable access to highly-valued hunting and fishing areas during future travel-management planning and during the forest plan implementation process.

In earlier comments, we detailed a need for the TNF to provide direction on motorized big-game retrieval (MBGR) and dispersed camping that is consistent with national forests throughout Arizona. Inconsistent rules on MBGR and dispersed camping on national forests and other public lands in Arizona create confusion among forest users and complicate enforcement activities. The TNF responded in the Need for Change document that "issues related to dispersed camping and motorized big game retrieval (MBGR) are outside the scope of the plan revision process. Both of these concerns are currently being addressed through the Travel Management process (TMP)." While we agree that this issue can be considered through TMPs and that it is related to the Collaboration & Partnerships section of the Need for Change document, we believe that, for the benefit of sportsmen, wildlife, and other stakeholders within the TNF and adjacent forests, a more clear statement of collaborative efforts with other agencies including AZGFD be in the plan to ensure efforts during travel planning provide coordinated and concise travel plans that ensure sporting access while conserving high-quality habitats. The TRCP would recommend the following:

? Rights-of-Way and Easements provide for broader access to lands within the TNF without impacting private inholding rights-of-way and easements.

? Acquisition of lands facilitates efficient management strategies for the TNF.

? Encroachment issues are resolved equitably for both adjacent landowners and the TNF.

? Access to public lands is provided throughout the planning areas.

? Easements are acquired to provide access to public lands for recreation, including wilderness and roadless areas.

? All available methods are used to obtain legal public or administrative access from willing landowners to cross non-federal land to reach public land lacking adequate access.

Livestock Grazing

Grazing of livestock will continue on most of our public lands as specified in federal law and regulations. The TRCP supports grazing management in a manner that provides the greatest benefit to habitat and wildlife resources. The TRCP would recommend the following regarding grazing:

? Research at New Mexico State University has shown that the maximum livestock forage use should be 30% - 35% for habitat sustainability for wildlife.

? Under best management practices, it requires all livestock waters on public lands be kept filled and available to wildlife on a year-round basis.

? To keep livestock from water in order to encourage grazing rotation, exclosures must be built and water cannot be turned off.

? If freezing is a problem, then the water may be turned off, but water must be supplied by tanks.

? All water must have wildlife escape ramps.

? Forest- and grassland-restoration projects that are successful mean that there will be increased grass forage available. Increases in available forage are reserved for watershed function and wildlife. After treatment, there should be no increase in grazing or allotment numbers to deplete the results.

? Proper livestock stocking rates and associated management activities contribute to healthy, diverse plant communities, soil stability, and wildlife habitat.

? Livestock grazing and associated management activities are in balance with the needs of wildlife forage, watershed ground cover, natural fire regime, and resilience to climate variability.

Comments on Draft Revision

Overall, we feel the FS did well incorporating the principles and direction mandated in the final planning rule. Below, we discuss some topline issues within the sporting community, as related to the DEIS.

Monitoring

Monitoring is likely the most underfunded and overlooked component of public-lands management. We support adequate funding for a strong monitoring program including appropriate follow up to ensure the success of TNF revised management plan.

Collaborations and Partnerships

Specific to the interests of sportsmen, a priority for collaboration with AZGFD that focusses on the needs of wildlife and the sporting community is important for the TNF. Issues including providing quality habitats, dispersed recreation, and access including MBGR should be collaboration and partnership priorities for the TNF. Additionally, nonprofit organizations can provide diverse resources from volunteer labor to science assistance for implementation of partnership projects.

Landscape-Scale Restoration

We support the consideration of restoration on a landscape level. Implementing more balanced grazing, assessment of OHV use, increasing vegetative cover, and implementing restoration projects that consider the big picture will better address system issues.

An emphasis on landscape-scale habitat restoration will provide benefits to big game, small game, and other species. Coordination of the management of TNF and adjoining lands that identifies wildlife connectivity and migration corridors for game species and other wildlife can help ensure healthy wildlife populations.

Landscape-scale restoration efforts should not be limited to forested areas. Desert-habitat restoration on a landscape level will also benefit big game and other species.

We also believe coordination across land management boundaries should be prioritized for management of wildlife connectivity, game retrieval, dispersed camping, and sporting access.

Frequent Fire Ecosystems

Fire plays an important role in Ponderosa pine forests as well as the desert. The condition of some TNF watersheds places them in jeopardy for intense wildfire. The TNF needs to address this situation. The TNF can benefit from utilization of lessons learned from the 4FI activities and utilize them in the plan revision.

As discussed, fire management can often be used as a tool in wildlife management as it can be a great benefit to wildlife pursued by hunters and anglers. As the planning process moves forward, we recommend identifying areas where fire can used as a management tool to enhance and restore wildlife habitat values.

Recreation

The TNF is one of the most visited national forests in the country. This creates a need to educate the public as to the impacts from extensive recreation use on land, water, and wildlife. In addition, the plan must control the impact of overuse while at the same time providing high quality recreation experiences. Finding that balance will be a major challenge.

There is a need to manage the TNF to provide quality fish and wildlife habitat for species of economic and recreational importance, including both native and non-native sport fish, elk, deer, sheep, turkey, bear, quail, and other small game.

Designated Areas

The TNF includes areas identified as Wilderness Areas. From a sporting perspective, there is a need to manage Wilderness Areas that maintains and protects wilderness values while providing flexibility to protect and manage fish and wildlife. Examples of the needed flexibility include, but are not limited to, the following: allowing for aquatic resource management (e.g., physical removal of noxious weeds, application of chemicals for weed or fish removal), allowing for construction or reconstruction and maintenance of habitat structures both aquatic and terrestrial, allowing for wildlife water development/ maintenance sometimes by limited use of motorized vehicle or helicopter, and allowing the AZGFD to utilize aircraft in managing wildlife as necessary for wildlife surveys and captures and releases as necessary and appropriate. The plan should consider opportunities to coordinate with AZGFD to develop management flexibility to ensure healthy wildlife populations.

Implementation and Adaptive Management

In order for the FS's planning efforts to be successful, significant implementation, monitoring, and adaptive management measures need to be implemented thoroughly and responses need to be as close to real time as possible. If implemented thoroughly, we feel that the general management direction outlined in the need for change and proposed actions (following the direction of the 2012 planning rule) would go a long way in ensuring proper adaptability of the management situation over the life of the plan.

The TRCP strongly supports Alternative B with the following recommendations:

From Alternative C: If a riparian area is non-functioning, as identified in the Proper Functioning Condition Assessment framework or similar protocol, all permitted and allowed uses will be removed until riparian recovery is achieved.

From Alternative C: At least one vacant allotment should be evaluated and closed to permitted grazing every two years, until there are no vacant allotments. If additional allotments are waived without preference, they will be evaluated and closed as part of the above two-year timeframe.

From Alternative C: May reduce AUMs.

Conclusion

In general, we feel that the FS is moving in the right direction in efforts to strike a balance between maintaining access to hunting and fishing, providing long-term recreation opportunities, allowing for a wide range of multiple uses, and safeguarding important fish and wildlife habitat. We feel that incorporating the recommendations discussed here would go a long way in helping to achieve this balance and we strongly encourage the FS to consider them as you move forward in the planning process.

We appreciate the opportunity to provide comments on changes that we feel are appropriate at this stage of the planning process, are supported by science and hunters and anglers, and are realistic given the reality of the management situation on the ground. We look forward to continuing to work with the FS and other stakeholders to add to these comments and provide any further information that is needed as this process moves forward.

Sincerely,

Recommended Literature

Ungulates

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Merrill, E. H., T. P. Hemker, K., K. P. Woodruff, L. Kuck. 1994. Impacts of mining facilities on fall migration of mule deer. Wildlife Society Bulletin 22:68-73.

Trombulak, S. C., and C. A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. Conservation Biology 14:18-30. 10

Other Resources

Off Road Vehicle Impacts on Hunting and Fishing. Izaak Walton league. http://www.glorietamesa.org/Off-Road-Vehicle-Impacts-on-Hunting-and-Fishing.pdf

Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands (2007). http://www.glorietamesa.org/USGSOHVBiblioReport.pdf

The Effects of Off-Road Vehicles on Ecosystems. http://tpwd.texas.gov/publications/pwdpubs/media/pwd_rp_t3200_1081.pdf

Effects of Roads on Elk: Implication for Management in Forested Ecosystems (2005). Research which builds on a large body of research demonstrating the impacts of roads on elk behavior and habitat. http://www.fs.fed.us/pnw/pubs/journals/pnw_2004_rowland001.pdf