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Comments:

We realize the resources and hard work it takes to finalize a new Forest Plan. The Arizona Elk Society (AES), representing 1250 members and thousands of organization supporters, appreciates the opportunity to review the Draft Forest Plan and DEIS and provide comments that will assist the Forest in making the best decision possible.

The Arizona Elk Society has been an active partner with the Coconino National Forest for many years contributing tens of thousands of dollars and hundreds of hours of volunteer labor directly to the Forest to complete numerous projects. The Arizona Elk Society's mission stated below is in line with the Forest's mission.

\*Conserving and enhancing wildlife habitat in Arizona.

\*Protecting and promoting our hunting heritage.

\*Promoting sound wildlife management and habitat through partnering with government agencies and other organizations.

\*Implementing special programs for youth education regarding conservation, hunting and outdoor activities.

\*Informing the general public about issues concerning wildlife conservation, as well as scientific and biological wildlife and habitat management.

Our members, hunters and anglers, are essential to the Forest. The Coconino National Forest would not be able to fulfill its wildlife management obligations without the sportsmen/women who utilize the Forest every day. It is important for the Forest Service to recognize that wildlife and fish located within the Forests are managed under the North American Wildlife Conservation Model which is the only one of its kind in the world. In the mid-1800's hunters and anglers realized they needed to set limits in order to protect rapidly disappearing wildlife, and assume responsibility for managing wild habitats. Hunters and anglers were among the first to crusade for wildlife protection and continue to advocate for wildlife today. The primary wildlife funding today is provided through taxes on firearms and ammunition, hunting licenses, and direct donation of funds and volunteer labor from individuals who like to hunt and fish as well as other forms of outdoor recreation.

The AES has two primary concerns, (1) proposed land designations will prevent the Forest from achieving desired vegetative conditions and (2) proposed land designations that will unnecessarily restrict use of the Forest.

#### Roads

It is not clear what additional road closures or changes to camping beyond what has already been decided under the TMP will occur. If additional restrictions to access are going to be proposed then this needs to be clarified in the FEIS. Recent planning under the Travel Management Rule identified an open road system and closed the forest to most cross-country travel. As a result, the road system should be the same for all plan alternatives and no additional roads or dispersed camping areas should be closed as a result of the Forest Plan.

The AES does not support additional access restrictions to roads or dispersed camping as it appears to be proposed under Alternative C primarily within proposed Wildlife Habitat Management Areas (WHMA) (see WHMA discussion below). If further changes are proposed to the TMP by further restricting access under the alternatives to the Forest Plan then alternatives need to be crafted with your sister agency, the Arizona Game and Fish Department (AZGFD). As stated on page 672 of the DEIS, the Forest would work with AZGFD when making any modifications to areas identified as wildlife corridors however the Forest did not work with AZGFD when developing the WHMAs which are the areas requiring further access restrictions and changes to the ROS under Alternative C.

### Recreation Opportunity Spectrum (ROS)

The ROS is a management objective and provides a way of describing a variety of recreation opportunities. An inventory was conducted of the existing situation and then ROS were modeled based on the alternatives. There is a reduction of approximately 8,000 acres of roaded natural (less than 1 percent) and approximately 115,000 acres of semi-primitive motorized (about 6 percent) between alternatives B and C (DEIS, pg. 576). Most of this reduction is due to the proposed Wilderness (see Wilderness discussion below) and WHMA designations. The AES would like to support WHMAs if they prioritized and provided for greater on-the-ground habitat management but the current proposal does not do this. The AES disagrees with the need for further access restrictions (see WHMA discussion below) therefore we recommend that the areas be modeled as semi-primitive motorized instead of semi-primitive non-motorized to guide future planning.

### Wildlife Habitat Management Areas

Under Alternative C, in addition to 13 additional wilderness designation proposals, eight Wildlife Habitat Management Areas (WHMA) are proposed. The AZGFD has the responsibility to manage resident wildlife while the Forest Service manages the habitat. This requires a special working relationship between the Coconino National Forest and the AZGFD. It was a surprise that we learned that the WHMAs were developed without AZGFD input (11/29/13, Lands update to the AZ Game and Fish Commission) and were based only on responses received from environmental groups.

The AES is not sure, based on what is outlined for Alternative C, that this alternative should even be titled, "Wildlife Habitat Management Areas". Language for Alternative C states that it responds to the issues related to noise disturbance and habitat connectivity for wildlife through the identification of WHMAs. Designation of an area as a WHMA would provide a low disturbance wildlife habitat for native wildlife species, allow for improved wildlife habitat (including habitat connectivity), and protect water quality and soil, vegetation, and water resources by limiting motor vehicle traffic (DEIS pg. 20).

The AES would be the first to support areas designated as wildlife management areas where key habitats were selected and there was a focus on restoring and improving wildlife habitats such as juniper control projects for grassland restoration, removal of noxious invasive species, restoration of riparian plant communities, etc. The AES has demonstrated its commitment by the donation of thousands of dollars and hundreds of hours of volunteer time directly to the Coconino National Forest. The AES made it possible to restore the habitat and watershed conditions for the Buck Springs Allotment area (proposed East Clear Creek WHMA) by facilitating the retirement of this allotment and has since that time donated countless hours and funding to habitat restoration. There is no question that the AES has demonstrated its commitment to wildlife and deserves the right to be heard.

Nothing in Alternative C provides direction for actively managing wildlife habitat. The proposed benefits for wildlife is based totally on removing all activities with motorized use through the creation of WHMAs and new wilderness areas and changing the old growth policy. It is questionable that Alternative C would provide any of the benefits being described by restricting motorized use further than what has recently been decided within the Transportation Management Plan.

The AES cannot support further restrictions on access and dispersed recreation above what has already been analyzed and included in the Travel Management Plan (TMP). In fact we believe the TMP went too far. Primitive roads with light use contribute little negative affect on wildlife populations. There needs to be a balance of motorized use and protection. There needs to be an awareness by the Coconino National Forest that sportsmen/women need motorized access. The TMP resulted in an approximate 69 percent decrease in the miles of roads in existing and potential special areas (including special areas, wild and scenic rivers, and wildlife habitat management areas). Approximately 300 miles would be closed, the majority of which fall within proposed

wildlife habitat management areas (240 miles). This would result in a decrease in habitat fragmentation as closed roads rehabilitate, which would improve resource quality (as stated in the TMP, FEIS).

Habitat quality is the key for protection, restoration, and maintaining wildlife populations. There is no scientific evidence that further reducing motorized access will increase wildlife populations. However it is known that further reduction of motorized access will take away from recreational use for hunting and wildlife viewing and the AES cannot accept any further decrease in motorized access. We recommend that the emphasis for any proposed WHMAs be on actual management to restore and improve habitats (which the current proposal does not) and at a minimum that any proposed WHMA be fully coordinated with the AZGFD especially as it relates to further access restrictions.

#### Wilderness

The AES supports wilderness values but cannot support the designation of any new wilderness areas. The wilderness values being sought under this designation can be obtained through managing these areas under one of the primitive recreational opportunity spectrums or other types of non-wilderness designations. The Forest Service, in many respects, is paralyzed because of conflicting laws and regulations. Why would the Forest want to add another layer of restrictions when there are other appropriate means for achieving wilderness values? Many wilderness uses (deemed to be appropriate by the various government agencies) are being challenged preventing government agencies from being able to fulfil its resource management goals.

A recent example in Arizona is within the KOFA National Wildlife Refuge. The Fish and Wildlife Service (FWS) administers the Refuge in the Sonoran Desert of southwestern Arizona. It was established prior to the Wilderness Act specifically for wildlife with one of the primary species being big horn sheep. Congress designated 80% of the Refuge as wilderness in 1990. The FWS, with the support and encouragement of the State of Arizona, constructed artificial structures to supply much needed water to desert bighorn sheep. Under a Minimum Requirement Assessment the agency determined that the guzzlers, the use of motor vehicles (for access and transport) and mechanized equipment (for construction) were met the "minimum requirement exception" under the Act.

Wilderness Watch challenged the FWS. In 2008, the Federal District Court in Arizona rejected the Wilderness Watch claim and supported the FWS. However on appeal to the Ninth Circuit the court ruled against the FWS. As a result wilderness is now the primary management concern and not wildlife within the Kofa Wildlife Refuge.

The Wilderness Watch is but one of many "watch dog" organizations that is making it difficult for government agencies to balance their responsibilities to manage the natural resources and meeting the "letter of the law" under the Wilderness Act.

Within the Wilderness Watch web site there are many government agencies listed that have a legitimate need to manage the natural resources under their care and may not be able to do so because of wilderness restrictions and the inability of the agency to utilize the minimum requirement exception. We ask the question again, why would the Coconino National Forest want to further restrict itself from achieving its goals for resource restoration when there are other means of obtaining "wilderness" values?

We understand that Roadless areas have to be evaluated and considered for recommendation as potential wilderness areas during the forest planning process. The "catch 22" is that the guidelines will identify areas with "high" potential for wilderness and once you have made the decision these areas will essentially be treated as wilderness until further legislation is passed. The whole process of selecting wilderness is flawed as shown in the "Updated Coconino National Forest Wilderness Needs Evaluation" report because the "need" can also be met in other ways. The factors used to determine need would in many cases get the same result if one were evaluating areas as being in semi-primitive non-motorized or primitive ROS classifications instead of wilderness.

We will provide a specific example, as stated in the Updated Wilderness Needs Report. On page 17, Table 11,

wildlife habitat connectivity is evaluated for Strawberry Crater and given a "high" ranking for grassland that provides movement for pronghorn and other grassland species. It is given a high ranking based on the premise that "preservation" will restore or be the best for grassland habitat when it will do exactly the opposite. The biggest threat to pronghorn movement is the encroachment of the grassland by juniper and the greatest need to assure "connectivity" is grassland restoration. Designation of this area as a wilderness will restrict active management that is needed to restore grassland conditions because of restrictions on all "motorized" use. We would argue that by designating this area wilderness the added value would actually be low.

As stated in the needs assessment, there are various land designations that are not wilderness, but are likely to provide opportunities for unconfined outdoor recreation experiences. The Forest Service uses the Recreational Opportunity Spectrum (ROS) to classify settings for recreational opportunities. The Semi-Primitive Non-Motorized and Primitive ROS classifications are likely to provide a "like-wilderness" setting. In addition, Inventoried Roadless Areas (IRA) may provide an unconfined outdoor recreation experience. These land designations imply that there are limited roads and, therefore, reduced evidence of human use. These lands can provide an unconfined recreation experience similar to wilderness. There are over 160,000 acres of these "wilderness-like" areas on the Coconino National Forest (Updated Wilderness Needs Report, pg. 13).

The AES is concerned that new designated wilderness areas will increase risk to catastrophic wild fire and prevent adequate suppression efforts. The additional recommended wilderness areas and the Cottonwood Basin Fumeroles Botanical and Geological Area in alternative C constrain fire treatment due to increased coordination needs, logistical complexity (mainly access), a potential limitation in the type of fire management tools that can be used (e.g., hand tools instead of mechanized equipment like chain saws), and the need to mitigate activities and motor vehicle use in order to maintain wilderness character. Consequently, alternative C may result in fewer mechanical treatments, thereby potentially limiting fire treatment due to vegetative conditions that are more departed from reference conditions than more accessible areas outside of recommended wilderness (DEIS pgs. 653-654).

#### Vegetation Changes under Alternative C

Having large stands of dense old growth has a higher fire risk and reduces the acres of open forest with a grassy or herbaceous understory. We don't understand why the Forest felt that the issue that drove Alternative C for old growth was really an issue. The concern was, old growth forest components are underrepresented on the landscape and were better provided for in the 1987 plan than in the proposed revised Plan. Evidently there was agreement within the Forest because this was one of the major drivers for creation of Alternative C. This was an issue that was put to rest with many years of research by Reynolds, Covington, and several other authors that resulted in every forest Plan in the Region being amended in 1996 to address not only old growth but ecosystem health. These amendments changed the way the Forest Service managed the forests by no longer having areas set aside as old growth allocations but instead managing for old growth across the landscape.

As an example, under Alternative C the ponderosa pine PNVT direction is to add "In Ponderosa Pine PNVT, stands managed for old growth are at least 100 to 300 acres in size. In addition, ..." to FW-Veg-PP-DC-6 (DEIS, pg. 962). Similar language is being added to other vegetation types.

This is contrary to a major amendment that were made to the Plan in 1996 which stated: "Refer to USDA Forest Service General Technical Report RM-217 entitled Management Recommendations for the Northern Goshawk in the Southwestern United States" for scientific information on goshawk ecology and management which provide the basis for the management guidelines. Distribution of habitat structures (tree size and age classes, tree groups of different densities, snags, dead and down woody material, etc.) should be evaluated at the ecosystem management area level, at the mid-scale such as drainage, and at the small scale of site. The distribution of vegetation structural stages for ponderosa pine, mixed conifer and spruce-fir forests is 10% grass/forb/shrub (VSS1), 10% seedling-sapling (VSS2), 20% young forest (VSS 3), 20% mid-aged forest (VSS4), 20% mature forest (VSS 5), 20% old forest (VSS6). NOTE: The specified percentages are a guide and actual percentages are

expected to vary + or - up to 3%.

The amendment (common to all Forest Plans in the Region) directed the amount of old growth to be across the landscape where old growth mimicked the pre-settlement structure described by Covington and others which were in small groups. This change was brought about by years of research by Reynolds, Covington, and others and is the best science. We find it strange that the Forest would not dismiss this concern that old growth was better represented by the 1987 Forest Plan prior to the time it was amended based on all of the science that has occurred. One of the most under represented vegetative structural stage is open conifer forest with a grassy or herbaceous understory. Old growth evolved in small dense groups with the forest being quite open which is not what is being proposed in Alternative C where 20% of the forest is allocated to old growth in dense stands, 200 to 300 acre in size.

#### Grazing

The AES supports or agrees with many of the different sections of the proposed Forest Plan. A few of the highlights the AES supports are as follows:

- \*Changes to Research Natural Area Direction in the Proposed Plan Guideline. Addition: Livestock grazing should be excluded from research natural areas unless grazing supports or would not affect the area's research purpose (Alternative C).

- \*The grazing suitability review identified allotments and portions of allotments that were closed prior to 1987 (prior to the implementation of the 1987 plan). These areas have remained closed over the life of the 1987 plan. These areas were closed for a variety of reasons and the suitability review did not identify any reasons to revisit the closures at this time. The closed or partially closed allotments include:

- oAllotments closed prior to 1987 (Camp Verde, Middle Verde, Montezuma, Rimrock, Cave Hill, Dry Creek); Portions of allotments closed prior to 1987 (Cottonwood, Cinder, Turkey Tanks, Deadman, Dove Tanks, Frisco Mountain, Hart Prairie, Tom's Creek, Indian Gardens, and Oak Creek);

- \*The lands that are not suitable for livestock grazing according to the 1987 plan include:

- oStrawberry Crater Wilderness (USDA Forest Service 1987a. p. 110); Tundra and upper mixed conifer/spruce-fir slopes<sup>25</sup> within the Kachina Peaks Wilderness; Stoneman Lake basin (USDA Forest Service 1987a. p. 175); Cinder Hills OHV Area (USDA Forest Service 1987a. replacement p. 182); Oak Creek Canyon (formerly Management Area 14) (USDA Forest Service 1987a. p. 187); Developed recreation sites and Snow Bowl special-use authorization area (USDA Forest Service 1987a. p. 190); Inner Basin (formerly Management Area 16) (USDA Forest Service 1987a. replacement, p. 192); Oak Creek Canyon Research Natural Area (USDA Forest Service 1987a. new p. 196-1); Casner Research Natural Area (USDA Forest Service 1987a. new p. 196-1); Elden Environmental Study Area (USDA Forest Service 1987a. replacement p. 199); Old Cave Crater Environmental Study Area (USDA Forest Service 1987a. replacement; Griffith's Spring Environmental Study Area (USDA Forest Service 1987a. replacement; Right-of-way in the Highway 180 Travel Corridor (USDA Forest Service 1987a. new p. 206-4).

- \*The final step of the comprehensive review of suitability for livestock grazing was reviewing decisions that have affected livestock grazing on the forest. This review identified the decision for the Verde River Comprehensive River Management Plan that excludes livestock grazing from portions of the Verde Wild and Scenic River corridor. This review also identified three grazing decisions that removed grazing from three allotments and two grazing decisions that closed portions of two allotments to grazing. Based on these decisions, the following areas have been identified as not suitable for livestock grazing:

- oHorse Mesa, Boynton Canyon, and Sedona allotments (based on the decisions signed on September 26, 1997, March 1, 2000, and July 1, 1998, respectively); Portions of the Buck Springs Allotment (as described in the decision signed on August 18, 2003); Riparian habitat in the Verde Wild and Scenic River corridor, unless site-specific NEPA analysis approved by the forest supervisor authorizes future grazing use (Verde Wild and Scenic River Comprehensive River Management Plan, signed on June 14, 2004. p. 20); South Newman, Walnut, and West Walnut Pastures in the Walnut Canyon Allotment (based on the decision signed on July 28, 2006).

This concludes AES comments. Thank you for your consideration of this request. Yours in conservation:

