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Comments: Comments Regarding the Proposed Coconino National Forest Land and Resource Management Plan

I'd like to open by saying that after living with the 1987 plan for the past 27 years, I'm pleased to see this proposal come to light. Our forests and forest use has changed dramatically during this period and response to these changes are warranted. Prolonged drought, incidence and size of wildfires, Forest use increasing due to population increases and significant changes to the types of use are just some of the factors impacting the conditions today. The sheer volume of the material available concerning the plan proposal is overwhelming and very cumbersome for the average citizen to wade through and so I've limited my comments to my general areas of concern that I'll label as restrictive limitations and an affront to the lawful use of our public lands. I'll be responding specifically to the Comparison of Alternatives found in Volume 1 of the DEIS, Chapter 2, Table 1, pages 23-33.

The first topic I'd like to address is the proposal in Alternative C to ban recreational shooting on over 500,000 acres of proposed Wildlife Habitat Management Areas. While I support limitations on recreational shooting near homes, businesses, organized campgrounds or other similar locations I cannot support the widespread prohibition of recreational shooting in all proposed Wildlife Habitat Management Areas, under the guise of not disturbing wildlife. Arizona is a right to carry state, a legal, responsible possession and use of firearms is constitutionally guaranteed. According to the Department of Public Safety, at least 31% of Arizona residents own firearms and responsibly maintaining proficiency, providing training to other friends and family members and enjoying recreational shooting should not be curtailed on such a vast area of public lands, especially in the absence of nearby public shooting facilities, an issue that has been a problem on the Coconino NF for many years caused at least in part by local and Regional Forest managers. There are numerous other State and Forest laws and regulations that exist regarding firearm possession and responsible use that can be called upon to address improper activities. A 2011 poll of almost 1,000 widely diverse US citizens conducted for the National Shooting Sports Foundation found that over 71% of the respondents approved of recreational shooting, done in a responsible and appropriate fashion. Recent Federal guidelines also recommend developing or allowing recreational shooting on public lands when and where possible. Prohibition because of possible irresponsible use by a very small portion of the public should not make outlaws of the many responsible users. The proposal appears arbitrary given that no scientific justification is provided to demonstrate that recreation shooting is in fact harming wildlife. Rather than instituting an across the board ban on recreation shooting in WHMA's, the USFS should focus on enforcing current laws and restrictions and addressing specific problems in specific areas.

The next topic concerns potential restrictions and constraint from additional wilderness areas(WA), with almost a 50% increase in recommended WA's under alternative C, bringing the total WA acres to approximately 250,000. The supporting documents for this proposal point to an under representation of wilderness opportunities but further examination indicates that Arizona is quite well represented in wilderness areas with at least 90 designated locations totaling over 4 million acres, an average of about .65 acres for every man, woman and child resident. This is almost triple the national average of approximately .25 acres per US resident. Current population figures are courtesy of the US Census Bureau. Further problems with many of the proposed WA's include the presence of numerous existing roads, power lines or corridors, land improvements, such as fences, corrals, and other grazing tools as well as many water developments benefiting numerous species of wildlife. These are generally not pristine, never trampled upon by humans or undisturbed areas. While admitting that populations to our State are increasing, estimated to be 1.5% for 2013 by the Census Bureau, much of that population influx

as well as birth rates from existing residents are within the Hispanic ethnicity area, a group that is not frequently known for their forays into the peace and solitude of wilderness areas. Large blocks of intact and undeveloped public lands are critically important for providing wildlife habitat and also provide for outstanding public hunting opportunities. However, a formal wilderness designation limits active management to improve or restore wildlife habitat or to reduce fuel loads to prevent catastrophic wild fires. The FS should pursue options other than a formal a wilderness designation for conserving large undeveloped tracts of land to retain their value for wildlife and dispersed outdoor recreation, and still allowing for focused management activities that conserve and restore habitats, and promote a healthy forest. While some additional wilderness designations may be appropriate for smaller areas or to add on to existing areas, increasing wilderness acres on the CNF by almost 50% could have a significant adverse impact on those who enjoy motorized recreation, including wildlife viewing, hunting, geo-caching and other legal responsible uses. Problems with wildfire management, maintaining existing infrastructure for utilities, livestock and wildlife, Search and Rescue missions and other necessary activities could also suffer under alternative C. By comparison, alternative B would serve to identify some additional wilderness while not going overboard with alternative C.

The next topic will address the suitability of mechanized or motorized use as covered under the proposed WHMA's, and as mentioned in the proposed plan speaking about the Travel Management guidelines adopted in 2011. As publicized during the comment period leading up to the TMR decision, approximately 50% of the Forest users enjoy driving Forest roads for wildlife viewing, hunting, OHV'ing, birding, wood cutting and other perfectly legal pastimes. With the ROD in 2011, adopting Alternative 3 at that time, 59% of the CNF road mileage was closed to the public and almost 97 % was closed to dispersed camping and big game retrieval. Since 1998, OHV ownership in our State has increased 348%, according to information on the G&F website and during the educational period following TMR, approximately 30% of the vehicles observed on CNF roads were either OHV's or transporting OHV's, a huge portion of the public Forest users. Any management proposals to further reduce legal access to these public lands through Wilderness or WHMA designations should be considered to be not in the best interest of a substantial portion of our citizens. An example of the heavy handed management actions would be the infamous 72 hour "rule" publicized by the Forest last fall preceding the very popular Fall hunting seasons.

In closing I appreciate the opportunity to comment on the proposals, I did attend both Flagstaff meetings, I did get hard copies of the documentation and I visit these public lands at every available moment. Of the 4 alternatives presented Alternative B should be selected as the preferred alternative because it will provide many needed updates to the current plan while limiting the designations of new wilderness areas, road closures and recreational shooting restrictions. I actively volunteer/donate my time and money to improve these resources and I believe I'm voicing legitimate concerns regarding the management of these public lands. There are numerous other tools that can be used to achieve many of the goals presented as justification for the proposals and like wilderness advocates often recommend, the least disturbing should be used. Effective Forest Service law enforcement in problem areas, seasonal road restrictions similar to those currently used on some areas of Anderson Mesa, implementation of a Forest Service Courtesy Patrol during high use weekends to remind visitors of current rules and guidelines are just some of the suggestions that may be better suited for wider public acceptance. I would hate to see these public lands referred to in the future as the "Nononino National Forest" and I would hope that the local, Regional and National management staff take appropriate actions to see that this will not be the case.

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