

Data Submitted (UTC 11): 3/20/2014 12:00:00 AM

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Comments: March 20, 2014

Via Certified Mail

and Email to: coconino_national_forest_plan_revision_team@fs.fed.us

Coconino National Forest

Attention: Plan Revision

1824 South Thompson Street

Flagstaff, AZ 86001

Re: Draft Land and Resource Management Plan (Draft Plan) & Draft Environmental Impact Statement (DEIS) Coconino National Forest

Dear Sir/Madam:

Keep Sedona Beautiful, Inc. is a 501(c)(3) organization (KSB). It was formed in 1972 with the purpose of preserving the natural beauty of Sedona and the Verde Valley. KSB is a well-recognized and consistent voice for environmental stewardship throughout this area. As such, KSB is deeply concerned about plans for management of the Coconino National Forest (CNF). The attached comments regarding the CNF Draft Land and Resource Management Plan (Draft Plan) & Draft Environmental Impact Statement (DEIS) are submitted by KSB pursuant to 36 CFR 219.16(a)(2).

Before addressing our specific comments on the Draft Plan and DEIS, KSB would like to make a couple of observations and comments:

1. KSB appreciates the time and effort by the Forest Service to produce the Draft Plan and DEIS. We are aware that this has been in process for several years and represents the work of a number of people who have consulted on the document and composed the Draft Plan and DEIS language. KSB agrees with a significant portion of these documents and supports the work of the Forest Service to preserve the natural beauty and pristine character of the CNF for the benefit of visitors well into the future. This is a national treasure and we applaud the effort to keep it as undisturbed as possible.

2. As stated in our request for an extension, we feel compelled to comment on the immense pressure put on KSB to respond to the roughly 1,000 pages in such a short period of time. KSB has only two part time staff and the organization mostly functions through a dedicated, but still volunteer, board and membership. KSB has benefitted from the public meetings and open discussions with Forest Service personnel. Still, to organize and prepare detailed comments and get them to our Board and members has put extreme pressure on those working on these comments.

Nonetheless, we are submitting our comments to the Draft Plan and DEIS within the initial deadline provided. Generally we approve of the Draft Plan (Alternative B), subject to the Plan Wide and Plan Specific comments we have made herein. We also have requested that certain Wilderness Areas recommended in Alternative C be incorporated into the Plan. Finally, we have made specific objections to certain portions of Alternative D.

Our comments have been divided into two major categories:

Planwide Comments. These are comments on topics that permeated throughout the Draft Plan and became central issues for comment and discussion. We have cited some portions of the documents that deal with these issues. To a large extent, however, these are broader policy and management issues (e.g. Climate Change) which do not lend themselves to a specific comment on one portion of the Draft Plan or DEIS; and.

Plan Specific Comments. These are comments that have a precise reference to the Draft Plan. These represent suggestions, often with proposed alternative language, to the Draft Plan. We have also, to a lesser extent, commented on other alternatives which are not currently in the Draft Plan.

We may determine that we need to submit additional comments after the formal comment period has expired. We understand, however, that if we submit these comments they will also be considered by the Forest Service in evaluating revisions and modifications in arriving at the final CNF Land & Resource Management Plan.

We are readily available to answer any questions that you might have about these submissions. We do look forward to a continued working relationship with you in the coming years to preserve the natural wonder and beauty of the Coconino Forest in general and Sedona's Red Rock Country in particular.

Sincerely,

Tom O'Halleran, President
Keep Sedona Beautiful, Environmental Stewards Since 1972

cc: Calvin Joiner, Regional Forester

Keep Sedona Beautiful, Inc., acting through the stewardship of its members and volunteers, is committed to protect and sustain the unique scenic beauty and natural environment of the Greater Sedona Area.

Keep Sedona Beautiful Comments on Draft Land & Resource Management Plan for the Coconino National Forest and
Draft Environmental Impact Statement

Submitted March 20, 2014

A. PLAN-WIDE COMMENTS

As the Forest Service is aware, public participation is an integral part of the planning process. Our primary goal is to improve how the Coconino National Forest (CNF) is managed and convey what Keep Sedona Beautiful, Inc. (KSB) believes is needed to have a well-managed forest. As you know, our mission is at: "acting through the stewardship of its members and volunteers, [KSB] is committed to protect and sustain the unique scenic beauty and natural environment of the Greater Sedona Area." Given our group's and individual members' collective interests in the region, we have a long history of cooperatively working with the Forest Service on important matters for the area, including amendments to the current plan for the Coconino National Forest. As you know, as an organization, we worked extensively with the Forest Service on Amendment 12 of the current plan, coming to agreement on important standards and other planning tools to effectively manage our unique area in an integrated, science-based manner. Our hope is that the hard work related to Amendment 12 and other projects with the Forest Service will be reflected in a revised draft plan.

We appreciate the Forest Service has spent a significant amount of time on the Draft Land and Resource Management Plan (Draft Plan), the associated Draft Environmental Impact Statement (DEIS), and related documents. We had requested but were denied additional time to respond to the Draft Plan. We think such an extension would have allowed for more fulsome comments to assist the Forest Service even more. Our comments are examples of the issues and areas of improvement with the Draft Plan, DEIS, and associated documents. We look forward to a continued dialogue with the Forest Service on the Draft Plan and related documents. In terms of procedural requests, we ask the Draft Plan be disapproved in its current form, be revised to take into account public comments, that there be additional public participation in the

redrafting process, and that the Draft Plan and DEIS be reissued as a revised draft plan

(and as necessary DEIS) for additional comments before finalization.

1. Forest Planning Generally

The National Forest Management Act (NFMA) requires the land planning process and the plan itself to be interdisciplinary, open to the public, and compliant with applicable laws and regulations. 16 United States Code (U.S.C.) §§ 1604(b), 1604(e). The NFMA requires plans to "incorporate the standards and guidelines required" by the planning section of the act. § 1604(c). The plan must "form one integrated plan for each unit of the National Forest System, incorporating in one document or one set of documents . . . all of the features required by this section." § 1604(f). Under the Act, the United States Department of Agriculture has developed regulations to prescribe what needs to be in forest plans. The Forest Service develops forest plans with frequent public input so that the Forest Service can manage the public's lands in a way that "maximizes long term net public benefits in an environmentally sound manner." 36 Code of Federal Regulations (C.F.R.) § 219.1(a) (1982); see also 36 C.F.R. § 219.1 (2012). "Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management." § 219.1(b) (1982). Plans need to follow certain principles. *Id.*

The Forest Service has stated it completed its drafting of the Draft Land & Resource Management Plan for the Coconino National Forest (the Draft Plan) under the 1982 planning rules. Notice of Intent, 75 Fed. Reg. 26,711, 26,713 (May 12, 2010). The most recent planning rule, promulgated in 2012, allows the Forest Service to do so because it started the planning process before the effective date.

We would like to first point out that it appears that the framework of the more recent planning rule may have been used. The Draft Plan follows the 2012 planning rule concept of more focus on aspirations. While planning under the 1982 rule included aspirations, it also was arguably more prescriptive, and specifically requires certain binding standards and also guidelines and other planning tools for specific topics. Given that the Forest Service announced it was drafting the plan under the 1982 rules,

the Draft Plan should be amended to address those rules specifically. Even if the Forest Service were drafting under the 2012 planning rule, the Draft Plan needs more standards and guidelines to allow the Forest Service to meet its obligations under a variety of applicable laws, including the Endangered Species Act (ESA), the National Environmental Policy Act (NEPA), and the NFMA.

In developing forest plans, the Forest Service must use the best available science and plan for sustainability. E.g., 36 C.F.R. §§ 219.1(a), 219.12(d), 219.26 (1982); see also

36 C.F.R. § 219.3. Planning tools include desired conditions (referred to as "goals" under the 1982 regulations), objectives, standards, and guidelines, as well as other means. The Forest Service must "[e]stablish[] quantitative and qualitative standards and guidelines" in a plan. § 219.1(b)(12) (1982). A standard is mandatory, constrains decision-making, and is drafted to meet desired conditions or legal requirements. E.g., 36 C.F.R. §§ 219.5(a)(7) (stating that one of the interdisciplinary team's functions is "[e]stablishing the standards and requirements by which planning and management activities will be monitored and evaluated"), 219.15 (requiring standards and guidelines for vegetation management changes), 219.27(a)(10) (1982); see also, e.g., § 219.7(e)(1)(iii) (2012). An objective must be a "concise, time-specific statement of measurable planned results that respond to pre-established goals," commonly referred to as desired conditions. 36 C.F.R. § 219.3 (1982); see also § 219.7(e)(1)(ii) (2012) (similar to 1982 wording). The 1982 planning rule also requires the reasons for choices to be explained in the planning document(s). E.g., 36 C.F.R. § 219.15 (1982). While a plan focuses on desired conditions, objectives and standards (as well as other planning tools, such as guidelines, as appropriate) are essential to actually achieve the desired conditions and comply with the Forest Service's legal obligations.

Desired Conditions

We acknowledge that desired conditions are not themselves time specific (that is where objectives need to come into play). Nonetheless, the statement in the Draft Plan that it can take hundreds of years to reach a desired condition has the effect of rendering the desired condition meaningless and/or highlighting the need for more objectives. The statement also is contrary to Forest Service planning documents, which explain that desired conditions, while not timebound, should be accomplished in 10 to 50 years. USDA Forest Service, Foundations of Forest Planning, Volume 1 (Version 3.1) at 10

(Oct. 2008). The Draft Plan should be clarified to comport with the direction by Forest Service documents. Without this clarification, there is a distinct risk of pushing off projects that may be needed to achieve the desired condition and could have worse impacts.

We find the DEIS and the Draft Plan insufficiently describes current conditions, how they relate to CNF funding and priorities, and how the monitoring program will lead to improvement in areas of decline. As such, they violate NEPA, as well as potentially other legal requirements.

Examples of unanswered questions that need to be addressed to protect the environment and potentially sensitive species (endangered, threatened, etc.):

*Will we be maintaining ecological goals that are already in decline and are expected, without intervention, to continue that trend?

*Are our ecological goals only to maintain systems or to improve those in decline?

*Are the DC's indicated for vegetation, soils and riparian habitat providing realistic expectations for achievement?

Objectives, Standards, and Planning Tools

Overall, the Draft Plan lacks sufficient objectives and standards to plan for progress toward the desired conditions and/or to meet legal requirements. In our comments, we point out some of the specific areas where this occurs, but overall the Forest Service needs to add objectives and standards to meet its legal requirements.

Another key area of improvement regards monitoring. Doing so appropriately will not only meet these legal requirements, but also allow the public to understand the bases for future projects and follow Forest Service guidance.

Overall Planning

We find that many of the desired conditions in the Draft Plan are laudable goals. These alone, though, do not make an adequate plan. Unfortunately, the Draft Plan (throughout) lacks the other planning tools necessary to meet legal requirements (including the 1982 planning rule) and to be effective. An example of how the Draft Plan lacks sufficient integrated planning can be found in Chapter 2, Forest Wide

Management, Desired Conditions for Soil. The FW-Soil-DC (1) states: "Soils function properly to distribute water and cycle nutrients to a variety of vegetation including lichens, mosses, grasses, forbs, shrubs, and trees." Draft Plan at 16. While this is a laudatory goal, and may fit within the general concept of desired conditions, there are insufficient objectives, standards, and planning tools to adequately make progress toward the desired condition. The Draft Plan also does not (alone or in the related documents) address the findings of the "Coconino National Forest Ecological Sustainability Report (2009 Ecological Sustainability Report) dated September 2009." Given this report, it is hard to understand that this desired condition can be met in ten to fifty years.

The 2009 Ecological Sustainability Report indicated that for areas in the Verde Valley and Sedona, soil and vegetative conditions have serious issues. For desert communities in the Verde Valley Region, it stated that the potential natural vegetation type (PNVT) has a trend that is unknown for vegetation structure and composition. It also identifies that the PNVT is considered highly departed from reference conditions. See 2009 Ecological Sustainability Report at 2-20. Also, desert community PNVT currently has mostly unsatisfactory soil conditions. The projected future condition and trend projects this type of soil to remain unsatisfactory with a static trend over the next couple of decades. Id. at 2-57. For semi-desert grasslands in the Sedona Region, this report states that:

Under current management, the significant shift to shrubs and trees is likely to continue because continued lack of fire promotes the maintenance of woody vegetation. The presence of non-native annual grasses such as red brome could cause major changes in ecosystem integrity if not controlled.

It states that the soil condition is projected to move slowly towards reference because of implementation of current grazing strategies, etc. The projected trend, however, would be static under drought conditions. See id. at 2-57. The DEIS finds that both soil condition and soil productivity are highly departed from desired conditions. DEIS at

105. Under Alternative B the desired conditions and objectives project that 3,500 acres would be treated and potentially improve the ability of soil to resist erosion, infiltrate

water etc. For mixed broadleaf deciduous riparian forest in the Sedona and Oak Creek Canyon Region, the 2009 Ecological Sustainability Report, projects that this vegetative region is expected to move away from reference conditions. In addition there is a concern for non-native annual grasses and higher fire occurrence. See 2009 Ecological Sustainability Report at 2-23. Also, the report projects that the current trend is static and the departure from reference conditions is low. Id. at 2-58. It does not appear any of this scientific information was sufficiently incorporated into the Draft Plan, particularly as to objectives and standards to address these very serious concerns.

All of this information is provided as an example to highlight that throughout the Draft Plan the desired conditions,

objectives, standards, and planning tools taken together do not reflect or, importantly, address (particularly through objectives and standards) the best available science; do not provide for adequate planning; and do not meet the requirements of the 1982 planning rule. As such, the Draft Plan does not meet legal requirements, including requirements under the NFMA, ESA, and NEPA.

We need to know and understand what we can do today so in the long-term we are making the right decisions. An issue with desired conditions is that they are subjective and open to interpretation that will confuse the public and cause unnecessary conflict, particularly when objectives and standards, etc., are insufficient. This leaves a high degree of interpretation for future project decisions, which is untenable and not allowed under current laws.

2. Monitoring

The Draft Plan states desired conditions are the focus of the Draft Plan. Draft Plan at 5. That desired conditions are the focus of the Draft Plan makes the monitoring strategy that much more important. The Forest Service as an agency notes that monitoring is an integral part of planning. USDA Forest Service, Foundations of Forest Planning, Volume 1 (Version 3.1) at 12 (Oct. 2008) ("Plan monitoring and evaluation must be designed to answer the question of whether there is a need to change any of the plan components. Because desired conditions are the basis for other plan components, the

'need for change' question hinges on the evaluation of trends toward or away from the

desired conditions."). Moreover, it is required by the planning regulations. 36 C.F.R. §§

219.11(d), 219.12(k) (1982). The Analysis of the Management Situation report (ASM)

clearly identifies that the CNF is facing many challenges into the future.

The Management Report indicates that in 2000 there were an estimated 1.89 million visitors to the CNF. By 2005 visitation had increased to 3.25 million visits-an increase of 72 percent in just five years. ASM at 17.

A sharp increase in the population of Arizona (Maricopa and Yavapai counties, in particular), and improved transportation infrastructure have enabled rapid movement of people from the lower elevation areas of the state to the higher elevation and inviting cooler climate of the Colorado Plateau. This upward trend in recreational use on the CNF is expected to continue. Id. Moreover, the report finds that water, snow-based, motorized and non-motorized recreation is increasing, and there is an ever-increasing concern for health, safety and overcrowding. Id. More pressure may be put on watersheds and riparian areas, which could cause increased resource damage. Unmanaged recreation could cause resource damage and user conflicts. Off-highway vehicle use has increased dramatically, and unmanaged off-highway vehicle use can cause resource damage. Id. at 22.

It appears that the Draft Plan and related monitoring strategy are based on the CNF budgets over the last 5 years. The budget assumptions appear to conflict with the reality of the challenges the CNF is facing. A monitoring strategy based on appropriate funding is a necessary element for the Draft Plan's success. There does not appear to be any funding analysis within the Draft Plan, DEIS, or other cited reports that identifies the actual funding requirement for the forest to meet its desired conditions or, for that matter, to maintain and improve the ecosystem of the forest. Without such analysis, KSB believes the Forest Service cannot meet its regulatory requirements the 1982 planning rule. Without this important budgetary analysis, the Forest Service is in danger of not meeting its requirements under the Endangered Species Act and other laws that require monitoring or other planning activity.

That appropriations may differ from what may be requested does not relieve the Forest Service of its duty to

understand what it needs to meet its regulatory obligations. Moreover, under the 1982 regulations, budget proposals "shall be based on the plan."

36 § C.F.R. 219.10(e) (1982). If there are differences in the proposal and appropriated

funds, the Forest Service can change proposed implementation schedules, though such changes are considered plan amendments. Id. (given that the changes to implementation schedules are considered plan amendments, this provision of the 1982 planning rule arguably is still effective and, even if not, emphasizes the point that there is and should be a difference between budget proposals and allocating funds and that both exercises are important).

Without developing the budgets for the necessary work to meet desired conditions, objectives, and standards, the Forest Service is not communicating to Congress what the needs are. Without this information, Congress is unaware of the need. It of course will ultimately decide what portion of the national budget will be allotted to Forest Service work. But without the initial input, it will not have sound information upon which to make its decision. Without providing this information, the Forest Service may be contravening the requirements and intent of 16 U.S.C. Section 1606 and similar budgeting requirements. Also, this information should be used for the Strategic Plan required under the Government Performance and Results Act of 1993 (Results Act) (5 U.S.C. 306; 31 U.S.C. 1115 - 1119; 31 U.S.C. 9703 - 9704). See Forest Service Manual 1900-Planning (1900-2007-2) at 17-18 (eff. Oct. 12, 2007). Moreover, as a practical matter, without such a process with transparency, the American people cannot understand how its land should be managed if it were appropriately funded. Therefore the American people cannot communicate with members of Congress to get appropriate funding.

The Draft Plan states: "The forest supervisor annually evaluates the monitoring information displayed in the evaluation reports through a management review and determines if any changes are needed in management actions or the plan itself." Draft Plan at 177. The evaluation considers questions such as those concerning what degree resource management activities are maintaining or making progress towards desired conditions and objectives. In addition, the evaluation addresses what modifications are needed for unanticipated conditions. There is no indication that these evaluations and changing management actions are made available to the public.

At a minimum we feel the Draft Plan should identify a continuing role for the public in the following areas:

- *Develop a yearly report to the public on monitoring activities, changes in the monitoring plan, and current conditions on the forest. This element should include notification of the release of the report and public meetings.

- *Report the current status of attaining desired conditions.

- *Implement a process to address public involvement in the monitoring program.

- *Review yearly the proposed and allocated budget (with at least summary information about proposed and ongoing projects and monitoring) for CNF and how it affects attainment of desired conditions.

- *Develop of a formal public outreach program about each of the above.

- *Establish an electronic notification system that the public can opt into.

While some of this may be addressed by current reports, not all of it is and the public outreach about such

reports needs to be improved. The monitoring strategy has a baseline for current conditions, but there is no clear indication what the trend has been for forest conditions since the 1987 plan was approved. It would seem logical that the public should know what the trends are within the various affected environment categories. The public would then have a clearer understanding of the challenges the CNF is facing; if desired conditions are being achieved; and if they are not being achieved, what measures are needed to achieve them or whether they can ever be achieved.

The Draft Plan is based on the average budget over a five-year period. The five-year period used has seen major funding cuts to the forest budget. We have not been able to find anywhere in the Draft Plan the amount of funding that will be directed toward the monitoring program. There is neither a specific amount nor a set percentage.

As such, the Draft Plan needs to incorporate the following:

- *State the Forest Service will develop budgets for projects that are needed to meet desired outcomes, objectives, and standards. This process can use a prioritization process to identify projects that need budgets.

- *Identify in the Draft Plan if funding for monitoring activities will be sufficient to meet the Draft Plan's identified desired conditions.

- *Notify the public of CNF funding for monitoring and forest maintenance.

The public also does not have any indication on plan progress based on monitoring or what the baseline was in 1987 and if progress has been made since. The impacts to the forest through increased visitation and regional population expansion can have a dramatic impact on the ability of the CNF to reach desired conditions or maintain the forest. There is a need for a transparent process to facilitate information to the public. Therefore, the Draft Plan should:

- *Develop a public notification and reporting process to identify desired conditions progress based on monitoring.

- *Identify in the Draft Plan the monitoring strategy baseline conditions in 1987 and how they relate to currently recommended desired conditions. Explain whether the progress against the desired condition has been made since 1987 or whether we are on a declining path.

- *Publish a yearly monitoring report inclusive of all activities for desired conditions, species protection, and those required by forest regulation and statute.

- *Establish a guideline that requires public disclosure of the forest supervisor's annual review of monitoring program along with any management decisions affecting desired conditions. Also identify if changing conditions in the forest requires a change in management direction. These public disclosures should be broad announcements that new information is now available on the website and specifying that information.

3. National Scenic Area

The Forest Service has supported KSB's extensive efforts to have the area designated as a National Scenic Area (NSA). This is a major initiative that will benefit the area. In the DEIS, the Forest Service describes what alternatives were not considered. DEIS at 12, No. 4. The DEIS states:

[NSA] designation was eliminated from detailed consideration because the land adjustment plan direction central to the national scenic area proposal has been carried into the proposed action and alternatives, and the values sought through such a designation have been incorporated.

KSB believes this language is inconsistent with prior positions taken by the Forest Service on the issue of a National Scenic Area (NSA) for the Sedona/Oak Creek area and, in fact, could be used by opponents of an NSA for this area. This language in the DEIS needs to be changed. Initially KSB would note that the Forest Service has for years provided unequivocal support for NSA designation for the Sedona/Oak Creek area. National Forest Deputy Chief Holtrip, in testimony before the Congressional House Natural Resource Committee on June 10, 2010, stated:

The Sedona-Red Rock National Scenic Area would designate 160,000 acres of the Coconino National Forest as a National Scenic Area. The spectacular scenery of the area draws millions annually and the proposal has broad support from the community which has worked on the special designation proposal since January of 1999. The bill limits land exchanges that dispose of National Forest System land within the National Scenic Area. This designation would complement the work of local forest managers and community to balance services to support visitors and protection of important landscape.

.....this recommendation that we have is based on conversations with the district ranger, forest supervisor,

regional forester and our own review of it. We are supportive (Emphasis added.)

Thus, for years the Forest Service has been firmly in support of NSA designation for this area.

One might argue that the new plan includes all of the essential elements of an NSA and therefore there would be no need to go any further. We all recognize, however, that NSA designation provides additional support and protection for this area beyond those that have been incorporated into the Draft Plan. Therefore KSB asks that this language be modified to clarify the support for an NSA by both the community and the Forest Service. Such alternative language could be:

The Forest Service has consistently been in support of having the Sedona/Oak Creek area designated a National Scenic Area. While this designation cannot be accomplished by the Plan, the Draft Plan does incorporate some of the principles which would be important in an NSA designation. In particular the land exchange limitations in the Draft Plan would also be important in an NSA. The Forest Service continues to support the NSA designation for this area in the future.

If for any reason this language could not be substituted for the current language in the Draft Plan, then KSB would prefer that the current Draft Plan language cited above be eliminated from the DEIS in its entirety.

4. Land Adjustments/Exchanges

One of the most central issues for the protection of the beauty and attractiveness of the Sedona Red Rock area is than preservation of the geographic and scenic quality of the area. The lynchpin of this protection is the restrictions on land exchanges that have been an integral part of the forest plan and management of this area for

decades. This has been embodied in Amendment 12 to the current plan. These restrictions have, to a large extent, been incorporated into the Plan.

In reviewing these restrictions and the proposed language, however, KSB believes these provisions need to be modified to clarify the intent of the language and ensure that land exchanges of any kind would only further the scenic integrity of the area and not diminish-in esthetics or size-the Sedona Red Rock area. In that regard KSB has several specific concerns and comments:

Reference: MA-SedOak-S (pg. 136, DC #7): "General Description for Land Adjustment" (pg. 95).

Language: In the Forestwide discussion (pg. 95) the general category is termed "Land Adjustments."

Issue: This term is not defined in the Glossary. However it is discussed generally in the forestwide provisions. By its terms it is much broader than a "land exchange" and it also includes "sale, purchase, conveyance and right of way." The restrictions in the SedOak MA are limited to "Land Exchanges." The standard states: "Land exchanges that dispose of national forest land . . . will occur only if they result in acquisition of [land] in Sedona/Oak Creek MA." Draft Plan at 136 (DC #7) This language is too narrow in light of the broad interpretation given to "land adjustments."

Alternative:

- a. Broaden the standard to include land adjustments of any type. Without this change in the Draft Plan language, land adjustments other than land exchanges will not have the appropriate limitations.
- b. Include a definition of Land Adjustment in the Glossary

Reference: MA-SedOak-S (pg. 136, #7) - Land Exchange - scenic quality.

Issue: As cited above, exchanges are allowed only if they result in acquisition of land within the Sedona Oak Creek MA. While this is a provision that KSB supports, we believe it should be more restrictive. This language would allow a land exchange that technically meets the standard but results in a diminishment of the scenic integrity of the area.

Alternative:

At the end of #7 add the following sentence: "The land received by the Forest Service in any such exchange must have "scenic integrity" (Glossary pg. 204) equal to or greater than the land being exchanged."

KSB believes that these two modifications to the Land Exchange provisions of the Draft Plan will provide desired

conditions that will help carry out the intention of the plan and the wishes of the community to limit land exchanges and thereby preserve the intrinsic beauty of this area. The Forest Service should consider whether additional standards or guidelines would assist.

5. Wilderness Areas

With 1964 Wilderness Act established a National Wilderness Preservation System for the permanent good of the whole people, and for other purposes, the government of the United States recognized the need for preservation of critical habitat for future generations. Public Law 88-677, 16 U.S.C §§ 1131-1136.

The Wilderness Act states in Policy Section 2(a):

In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protections in the natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness.

This statement is truer today than it was in 1964. Today the pressures on our National Forest System are greater than at any time in the past. Our urban environments are continuing to expand as more and more of our population seeks employment that is not available in rural settings. Not only is our nation continuing to grow, but the Southwestern United States and Arizona have become an international tourist destination. Many of those who use our forests come seeking solitude, scenic beauty,

rivers and streams, wildlife, recreation, and adventure that cannot be found in our country's urban environments or often even in other forested areas. The preservation of wilderness areas allows urban visitors to experience these attributes in as close to natural condition as possible.

Arizona, California, and the Southwestern United States generally have seen record population growth over the last half century. This growth is expected to continue. The CNF has some of the most unique and beautiful forest lands within the National Forest System and the world. The CNF is also situated close to a major metropolitan area and acts as an oasis from the summer heat of the Phoenix metropolitan area. This close proximity to the population center of Arizona will continue to have a profound impact on visitation to the CNF.

Given Arizona's arid desert environment, the CNF is a paradise to those who seek the wonders of its forests, rivers and streams. As indicated in the Draft Plan, the State of Arizona has designated three CNF streams-Fossil Creek, Oak Creek, and West Fork of Oak Creek-as being outstanding state water resources and classified them as Outstanding Arizona Waters. The lower Verde River and Fossil Creek are Arizona's only two waterways federally designated as Wild and Scenic Rivers. Fossil Creek contains the largest assemblage in Arizona of native fish species in a creek that is free of nonnative fish. It also has a travertine formation of international significance. Draft Plan at 13

Background Bases for Wilderness Area Comments:

Potential Wilderness Area Evaluation Report (Evaluation Report):

*There is recreational need for wilderness throughout the CNF due to projected population increases, the high existing wilderness use on the CNF and the high use of wilderness in northern Arizona. Evaluation Report at 10.

*Arizona has fewer acres of wilderness compared to other portions of the Southwestern Region of the Forest Service, despite being an area of higher wilderness use. Evaluation Report at 10.

*The CNF has a wilderness need throughout the forest, yet there is only an additional 14,983 acres of wilderness proposed. DEIS at 605.

Colorado River Water Supply and Demand Study:

*Population in the seven Colorado River Basin states is expected to expand over the next 50 years from today's current 40 million to a range of 48-70 million.

Arizona's Water Resource Development Commission: Executive Summary

*In the next 50 years, Arizona is expected to grow in population from today's almost 7 million people to over 12 million. By 2110, Arizona's population is expected to be in excess of 18 million. Executive Summary at 15.

Arizona's Next Century: A Strategic Vision for Water Supply Sustainability: (Executive Summary)

*Arizona could be facing a water supply imbalance between projected demands and water supply availability approaching 1 million acre-feet in the next 25-50 years. Executive Summary at 16.

*The imbalance is projected to increase by an additional 2.3 million acre-feet by the year 2110. Executive Summary at 17.

*In many parts of the State, this short term imbalance can likely be solved in the enhanced management of locally available water supplies. Executive Summary at 16.

*The stresses imposed by these imbalances would be experienced by all water-using sectors in the State and would likely have undesirable environmental consequences. Executive Summary at 17. This statement alone highlights the important issues involved with permanent protection of open space for water quality and quantity preservation. This issue is related to our water supplies, wildlife, ecosystems and quality of life.

KSB's Observations and Assumptions:

*While the Draft Plan and DEIS identify a concern for population growth, they do not (but should) identify the magnitude of growth and impacts on the forest.

*The identified need for additional wilderness does not appear to be met by inclusion of only an additional 14,983 acres of wilderness.

*All but three of the thirteen alternative wilderness areas evaluated are directly bordering some of the most important wilderness areas in the forest and the United States. The resulting increase in acreage/suitable habitat of the already-designated wilderness areas would result in better chances for survival of rare and endangered species present in one or both of the adjacent wildernesses, higher biodiversity, more significant watershed protection, potential closure and naturalization of existing roads, and a better wilderness experience for the visitor. Of the remaining three recommended wilderness areas, Walker Mountain would provide a connecting link between Wet Beaver/Deadwood Draw and the proposed and existing contiguous nine wilderness areas from West Clear Creek all the way to Fossil Creek and onto Mazatzal wildernesses. The two remaining recommended wildernesses, East Clear Creek and Barbershop, are contiguous and would protect critical riparian area of East Clear Creek. See DEIS at 809, Map 28.

*The CNF contains important surface and groundwater resources that should be preserved. Many of the

alternatives are within the same groundwater and surface water basins as current wilderness areas. Their inclusion into the wilderness system will help maintain the character of current wilderness areas and help with preservation of water resources.

*As identified in the Potential Wilderness Area Evaluation Report, a number of the wilderness areas considered under Alternative C currently have Off Highway Vehicle (OHV) access that could impact the desired conditions for water quality. The Draft Plan currently highlights the need to improve total maximum daily loads (TMDLs) into surface water, but it does not seem to adequately address how TMDLs will be improved.

*As the nearby Phoenix metropolitan area expands, the demand for day use of the forest will only increase. If the additional alternatives are not protected, it could result in their having lower evaluations in the future on capability, availability and need. In other words, if we do not adequately analyze these alternatives now, they may later become unsuitable for wilderness designation and, with that, we would lose important

opportunities to meet desired conditions relating to people being able to use wilderness areas, as well as other desired conditions relating to protecting water and habitat for endangered, critical, or sensitive species.

*All of KSB's additional wilderness recommendations have been evaluated as either high or medium except for Railroad Draw, which is low for availability. Evaluation Report Table 1 at 8.

*The permanent preservation of open space, especially wilderness areas, helps provide for the protection of critical Arizona watersheds. This will be especially true given the explosive growth Arizona will be experiencing.

*Congressional designation of the Cedar Bench, Black Mountain, Cimmaron-Boulder, Hackberry and Davey's Wilderness areas would create wilderness that connects the current Fossil Creek Wilderness Area with the West Clear Creek Wilderness. This would allow for a large wilderness experience in an environment surrounded by the two creeks and the Wild and Scenic part of the lower Verde River. It would also provide important protected wildlife corridors. See, e.g., DEIS at 809.

*Also, it is not apparent from the documents that the requirements of 36

C.F.R. Section 219.17 (1982) are fulfilled because there was not a summary of the roadless areas in the CNF, and then the planning documents lacked an evaluation or consideration for recommendations of roadless areas (that is, it was not in the Analysis of Management Situation document, the DEIS, or the Draft Plan). The Draft Plan should more fully assess and discuss roadless areas and whether they should be pursued for Wilderness designation.

*The Draft Plan does not address visitor use or evaluate control measures for wilderness areas as required by 36 C.F.R. Section 219.18 (1982). KSB suggests the Forest Service consider adding objectives, standards, or guidelines for each wilderness area, as needed, to conform with Section 219.18.

Alternative B Wilderness Recommendation:

KSB agrees with the proposal for new wilderness areas at Strawberry Crater, Walker Mountain and Davey's.

Additional Wilderness Recommendations and Reasons for Inclusion into Alternative B

and the Draft Plan:

Railroad Draw:

*Helps protect and preserve what has been called Arizona's second Grand

Canyon, Sycamore Canyon.

*Part of Sycamore Canyon drainage area helping with water quality and quantity.

*Habitat for Mexican spotted owl, bald eagles and riparian species.

Important for future generations. Given Arizona's history on riparian habitat preservation, the placement of this area into wilderness will help future riparian species.

*Evaluation Report identifies area as High for Capability.

*Low availability rating is outweighed by the importance to preserve the ecosystem of Sycamore Canyon, the high capacity rating and moderate need rating.

*Selection would also help with the low inventory of wilderness lands in the

Flagstaff region. Deadwood Draw:

*Expansion and protection for the current Wet Beaver Creek Wilderness

Area.

*Additional protection for watershed.

*Would lessen the amount of OHV's in area and help with TMDL mitigation

and erosion.

*Area would significantly enhance the wilderness characteristics and opportunities related to remoteness and solitude for adjacent wilderness Evaluation Report at 31.

*Wet Beaver Creek watershed is one of most studied watersheds in

Arizona and should be preserved.

*Evaluation rating of High. Important preservation of primitive surroundings for Northern leopard frogs, Golden Eagle, four spotted skipperling, spotted

bat, greater mastiff bat, Townsend's big -ear bat and Allen's lappet browed bat as well as potentially other species. Evaluation Report at 31.

*Provides for improved heritage resource protection. (Forest Service

2011b) The area would promote wilderness recreation related to these values. Evaluation Report at 32.

*Area is easily accessible from Interstate Highway 17 and would provide the increasing population of Arizona ready access to a high-quality wilderness experience.

*Would help alleviate pressures on other wilderness areas within the CNF.

*Evaluation Report Table 1 identifies a rating of High need. This should be considered when assessing future impacts to this area by continued OHV use, which will also have impacts on visitation, quality of experience, erosion and TMDL load.

Cedar Bench:

*Adjacent to the important West Clear Creek Wilderness Area.

*Would benefit a variety of species and protect the biodiversity of the area.

West Clear Creek has more biodiversity than many other areas of the Southwestern United States. Botanical and wildlife resources in the area include Verde Valley sage, golden and bald eagles and southwestern willow flycatcher. Evaluation Report at 43.

*West Clear Creek is a major tributary of the Verde River,

*West Clear Creek's water quality would be better protected. Evaluation Report at 43. This would be expected to benefit the Verde River water quality.

Black Mountain:

*Currently mostly free from human disturbance. Evaluation Report at 45.

*Adjacent to the important West Clear Creek Wilderness Area and would provide additional protection to the environment, special species and watershed.

*Contains 187 acres of regionally under-represented ecosystems.

*Area in two identified wildlife corridors. Evaluation Report at 46.

*Rated high for need and capability. Evaluation Report Table 1 at 8.

*Increase of wilderness character in West Clear Creek Wilderness. Area would promote wilderness recreation and includes a popular swimming hole. Evaluation Report at 48.

*Primitive setting would benefit a variety of species and would promote biodiversity. The area would promote watershed quality and function. Other riparian resources would also be better protected from user interest in water-related recreation opportunities. Evaluation Report at 48.

Cimmaron-Boulder:

*Expansion of the current wilderness around West Clear Creek will have a positive impact on wilderness experience and preservation of the watershed.

Hackberry:

*Helps preserve the unique qualities of the Wild and Scenic section of the

Verde River.

*Mostly free of human disturbance. Evaluation Report at 55.

*High potential for scientific research and cultural opportunities. Contains several unique and rare species, including lowland leopard frog, narrow-head and Mexican garter snakes and Yellow-billed Cuckoo. Evaluation Report at 55.

*Preserving the primitive surroundings would benefit species, including many threatened and endangered species. Area is within four identified wildlife corridors. Evaluation Report at 56.

*Wilderness characteristics of this area would be enhanced. Evaluation

Report at 57.

*The primitive setting would promote the biodiversity of the area.

*Social values related to the addition of the wilderness would include community effects, passive use values, scientific values, biodiversity values, off-site benefits, ecological services and educational values. (Forest Service 2011)

*Its close proximity to the Fossil Springs Wilderness Area.

Tin Can:

*Help in the preservation and unique qualities of the Fossil Springs

Wilderness Area.

*The area has panoramic views and unique rock formations.

*The area has a few unique and rare plants and animals, including

Chiricahua leopard frog. Evaluation Report at 61.

*The wilderness characteristics of this area would be enhanced. It would increase the remoteness and opportunities for solitude on the forest within the adjoining Fossil Springs Wilderness. The area would promote wilderness recreation. Evaluation Report at 63.

*Help preserve the Wild and Scenic values of Fossil Creek.

KSB strongly believes these areas should be preserved in addition to those in Alternative B due to their unique nature, location to significant surface waters in Arizona and need for wilderness recreation opportunities. If designated, these areas will allow Arizona and the Forest Service to preserve lands necessary for the protection of our watersheds and threatened and endangered species. These additional wilderness areas also would help the CNF with regards to biodiversity and resiliency given climate change. Their addition into the Draft Plan and Alternative B would also assist the Forest Service with meeting desired conditions and objectives of creating more recreational wilderness, improving water quality (including lowering TMDLs), providing for connected wilderness experiences, protecting wilderness areas that have significant national values, and preserving the area for future generations.

As indicated in the Draft Plan, the CNF currently encompasses approximately 2 million acres. The seven additional wilderness locations we recommend for inclusion into the Draft Plan and Alternative B are a total of 74,759 acres or approximately 3.7 percent of the forest. There has been broad-based support for these areas being designated wilderness since, at the latest, 2007. There is a need to look at the wilderness designations in light of recent information on population growth, water resource needs, increasing tourism, need for wilderness areas, species protection, and preservation and the economic realities of northern Arizona. Following these recommendations should lead us to the conclusion that the addition of the seven wilderness areas discussed above, representing 3.7 percent of the CNF, will have a net positive impact on the forest

and related outcomes. It also will help meet multiple desired conditions across the Draft Plan and meets the overall regulatory requirement of planning geared toward sustainability.

6. Climate Change

The Draft Plan clearly indicates on Page 4 that the Forest Service appreciates the potential impacts of climate change and climate variability on the CNF. The Draft Plan states: "With respect to climate change, observed

concentrations of greenhouse gases are projected to increase, and climate change may intensify the risk of ecosystem change for terrestrial and aquatic systems, thereby affecting ecosystem structure, function, and productivity." Draft Plan at 4; see also DEIS at 568.

The Draft Plan also indicates that climate change and variability will be addressed as an integrated part of the plan rather than a distinct set of plan directions. It states: "Improved ecosystem function (i.e., progress towards desired conditions) is presumed to improve the resiliency of ecosystems to withstand changes in disturbance patterns, such as changes in frequency, intensity, timing and spatial extent, as a result of climate change." Draft Plan at 4.

While moving toward desired conditions may increase resiliency and thereby blunt potential climate change impacts, the Draft Plan lacks sufficient planning tools (standards, objectives, etc.) and monitoring to demonstrate movement toward the desired conditions and/or understand impacts of climate change to assess the ability to reach the desired condition and what additional measures may need to be taken. It becomes an aspiration to be resilient without a strategic plan to become resilient.

The Forest Service and USDA generally has recognized, though, that there needs to be more than aspirations. USDA Secretary Vilsack identified climate change as a serious threat and has instituted Regional Hubs for Risk Adaptation and Mitigation to Climate Change. Secretary Vilsack explained: "Climate Hubs will address increasing risks such as fires, invasive pests, devastating floods, and crippling droughts on a regional basis, aiming to translate science and research into information to farmers, ranchers, and forest landowners on ways to adapt and adjust their resource management." USDA Press Release No. 0016.14.

The program is designed to inform on ways to mitigate risks; public education about the risks climate change poses to agriculture, rangelands and forests; regional climate risk and vulnerability assessments; and centers of climate forecast data and information. It also will link a network of partners, including universities, nongovernmental organizations, and federal agencies such as the Department of Interior and the National Oceanic and Atmospheric Administration (NOAA). The USDA approach is a proactive approach that takes into account the need for integrated planning, education, and adapting to changing conditions. The report indicated that by the end of the 21st century, forest ecosystems in the United States will differ from those of today as a result of changing climate.

In 2012 the USDA, Forest Service and Pacific Northwest Research Station released a report titled Effects of Climatic Variability and Change on Forest Ecosystems: a Comprehensive Science Synthesis for the U.S. (the 2012 Climate Report). As stated in its description:

This report is a scientific assessment of the current condition and likely future condition of forest resources in the United States relative to climatic variability and change. It serves as a U.S. Forest Service forest sector technical report for the National Climate Assessment and includes descriptions of key regional issues and examples of a risk-based framework for assessing climate-change effects.

2012 Climate Report at ii. The 2012 Climate Report goes on to explain:

Although uncertainty exists about the magnitude and timing of climate-change effects on forest ecosystems, sufficient scientific information is available to begin taking action now. Building on practices compatible with adapting to climate change provides a good starting point for land managers who may want to begin the adaptation process. Establishing a foundation for managing forest ecosystems in the context of climate change as soon as possible will ensure that a

broad range of options will be available for managing forest resources sustainably.

2012 Climate Report at ii. The CNF also has the ability to partner with the Climate Assessment for the Southwest (CLIMAS) part of the University of Arizona's Institute of the Environment and was established as part of NOAA's Regional Integrated Sciences and Assessment program. There is a wealth of information available through established and credible government agencies from which to base management decisions. These partnerships should be part of a proactive process in maintaining and attainment of desired conditions where they currently do not exist. See also, e.g., Forest Service, Climate Change Considerations in Land Management Plan Revisions 2, 7 (Jan. 20, 2010) (Climate Change Considerations). The Draft Plan should be more specific as to how the Forest Service will interact with groups on research and analysis of issues.

KSB feels that a management approach that requires climate change to be an ongoing part of the evaluation process is critical to maintaining and attaining desired conditions. As indicated in the 2012 Climate Report, proactive climate change planning will result in a broad range of options for sustainability. It is also a necessary part of best management practices so that desired conditions do not continue to deteriorate and therefore have a negative impact to the forest. As indicated in the Draft Plan and DEIS there are many areas of the forest that are not in a functioning state today. These include many of the watersheds within the forest. Climate change is expected to negatively impact the forest further.

While the Forest Service has identified areas that will likely be impacted by climate change, the Draft Plan specifies relatively few desired conditions and almost no planning tools regarding climate change. Additionally, the Forest Service does not adequately tie climate change analysis, vision (desired conditions), strategy (standards, objectives, etc.), or monitoring to federally listed or sensitive species. In this way, the Draft Plan does not meet the Forest Service's guidance documents, the 1982 planning rule, or other legal obligations (e.g., NEPA and ESA). E.g., Climate Change Considerations at 3 ("identify some steps that could be taken during the life of the plan"), 4 ("Consider the influence of climate change in developing plan direction related

to threatened, endangered and sensitive species."), 5-6 (each of the three examples of desired conditions includes an objective and either a standard and/or a guideline).

We believe that climate change should be an identified program that is proactive, transparent, and integrated with the ongoing monitoring program. The monitoring program should include components to specifically monitor climate change, as integrated into other monitoring (which as discussed elsewhere needs to be improved). See *id.* at 1 ("Place increased value on monitoring and trend data to understand actual climate change implications to local natural resource management."), see also *id.* at 3 (the following evaluation tools are also good filters to develop a monitoring program: "water availability, systems susceptible to changes in temperature, and elevated levels of atmospheric CO₂ as factors affecting ecosystems"). The Draft Plan should include specific planning tools about collaborating with an active climate networking program with state and local government, land owners, and the public.

The Draft Plan may be in place for decades and should recognize the implications of climate change as part of the management process and public review. It appears that is the direction being taken by the USDA and recommended by the Forest Service.

7. Dark Skies

As you know, preserving the area's dark skies is a major KSB initiative. In the Draft Plan, MA-SedOak-DC, #4, regarding Dark Skies, last sentence, the Draft Plan states: "Clear, dark night skies are valued for stargazing and

as a professional astronomical astronomy resource." Draft Plan at page 131.

KSB believes that the management areas and special areas of the Plan do not emphasize the importance of preserving the dark skies. There are no standards, guidelines, objectives, or desired conditions in the Draft Plan that adequately address limiting light pollution and preserving the magnificent dark skies.

A dark sky is a natural resource that needs to be protected for posterity. In the Draft Plan, the dark sky is considered as part of Scenery. But the dark sky has great importance for the forest visitor in terms of experiencing the natural world, of which the nightscape is an important component, and for the amateur and professional astronomers who are drawn to Arizona by the dark skies to be found here, and specifically within the CNF. Because of the interest in dark-sky tourism and the

concomitant significant contribution to state and local economies, Dark Skies need to be a stand-alone Desired Condition, both forest-wide and especially for the Sedona/Oak Creek Management Area. See 36 C.F.R. § 219.1(b)(14) (1982). Also, as an editing note, the wording "astronomical astronomy resource" as stated in #4 of MA-SedOak-DC is awkward.

Given the problem of light pollution worldwide, it is important that the Draft Plan have outdoor lighting Standards, Guidelines, Objectives, and Desired Conditions. The Draft Plan's outdoor lighting plan should conform to the dark-sky compliant lighting prescribed by the International Dark-Sky Association (IDA) or a local community that has a stringent outdoor lighting ordinance. Flagstaff and Sedona, neighboring communities to the CNF, have stringent outdoor lighting ordinances. The Plan should show a commitment to preserving dark skies by developing a dark-sky compliant outdoor lighting standard that is similar to these ordinances (see also the IDA Model Lighting Ordinance) and implementing that standard within three (3) years of adoption of the Draft Plan.

As background, the IDA is a non-profit organization fighting to preserve the night. (<http://www.darksky.org>) As stated in the IDA website:

IDA is the recognized authority on light pollution. It is the first organization to call attention to the hazards of light pollution. The IDA promotes one simple idea: light what you need, when you need it. They work with manufacturers, planners, legislators and citizens to provide energy efficient options that direct the light where you want it to go, not uselessly up into the sky.

In March 2013, KSB began pursuing a Dark-Sky Community designation for the City of Sedona from IDA. We want to preserve Sedona's rich night sky: a place where on cloudless nights the Milky Way is not just visible but cuts a wide and naturally bright swath across the sky. Residents and visitors alike marvel at, and treasure, the spectacular night views of the heavens afforded by Sedona's dark skies. To receive a Dark-Sky Community designation from the IDA, a community must show exceptional dedication to the preservation of the night sky through the implementation and

enforcement of quality lighting codes, dark-sky education, and citizen support of dark skies.

Sedona, like the Forest Service, needs to protect its night skies, as they are an important part of why residents and tourists choose to live or visit here.

A Forest Service standard in the Draft Plan relating to dark-sky compliant lighting will promote ecotourism as well as protect the beautiful night sky and the environment dependent upon it. The dark sky should be conserved for future generations as well as providing forest visitors with the opportunity to be inspired by the magnificent nighttime beauty. Dark-sky compliant lighting reduces energy consumption, reduces light pollution in the

CNF, and helps protect wildlife. Astronomy tourism is becoming popular, and a dark night sky is essential for such tourism.

Forest-wide commitment to preserving the dark skies should be indicated through publications and educational information about preserving the night sky and by being placed in the Visitor Centers. The Forest Service should provide leadership to educate forest visitors and recreational outfitters about the importance of dark-sky compliant lighting.

Alternatives:

A. Create new Desired Conditions in the following:

1) Chapter 3, page 131; Desired Conditions for Sedona/Oak Creek Management Area; MA-SedOak-DC #4; Create new Desired Conditions after Scenery and before Developed Recreation

2) Alternative Language of new Desired Conditions:

Dark Skies in the modern civilized world are becoming a rare natural resource due to light pollution. The dark night sky of the SedOak MA is exceptional. On moonless nights the Milky Way cuts a broad bright swath across the sky and major constellations are easily identified by naked eye. The dark skies are protected for posterity by prevention of light pollution and education of the public as to the importance of dark skies for the ecosystem and for astronomy.

If the current sentence in the Draft Plan is to be retained, however, it should read: "Clear, dark night skies are valued for stargazing and as a necessary natural resource for the amateur and professional astronomers."

B. Create a Standard for preserving dark skies forest-wide in general and for the Sedona/Oak Creek MA in particular, because this MA lies within the City of Sedona and Yavapai County, both of which have outdoor lighting ordinances that protect the dark sky.

1) Chapter 3, page 137; Insert a new Standard under new heading Dark Skies; MA-SedOak-S #1

2) Alternative Language of new Standard under its own heading: Dark Skies MA-SedOak-S#1

All outdoor lighting on Forest Service property, including roads, parking lots, recreation facilities, visitor centers, outhouses, toilets, camp grounds, staff residential areas, concession buildings and signage must be dark-sky compliant or conform to local outdoor lighting ordinances, whichever is more stringent in preventing light pollution.

C. Insert first new Guideline for preserving dark skies

1)Chapter 3, page 137; Guidelines for Sedona/Oak Creek Management Areas;

put it immediately after Scenery, under new heading Dark Skies

2)Alternative Language of new Guideline (omit: under its own heading): MA-SedOak-G#1
Dark Skies

All new lighting on Forest land should conform to the local Outdoor Lighting Ordinance or to dark-sky compliant lighting prescribed by the International Dark-Sky Association, whichever is more stringent in preventing

light pollution. Any existing grandfathered non-compliant fixtures shall be replaced with dark-sky compliant ones. The Forest Service should be a leader in implementing new lighting technology that saves energy and prevents light pollution (including from light rich in the

blue wavelengths - hard white light - which is especially detrimental to astronomical research so important to Northern Arizona).

D. Insert second new Guideline under Dark Skies heading.

1) Chapter 3, page 131; Guidelines for Sedona/Oak Creek Management Areas

2) Alternative Language of new Guideline under its own heading: MA-SedOakG#2
Dark Skies

For public education on Dark Skies, create brochures to be placed in Visitor Centers and add appropriate text to rules for FS camp sites, RV sites, concession facilities, roads, signage, etc., stipulating the type of outdoor lighting permitted on such sites.

8. Endangered, Threatened, or Sensitive Species

The Draft Plan insufficiently explains and/or addresses its requirements under the Endangered Species Act and other legal requirements with regards to endangered, threatened, or critical species (or similar designations). For example, the Draft Plan notes: "Recommendations regarding Mexican spotted owl (MSO) habitat are contained in the 'Mexican Spotted Owl Recovery Plan.'" The Draft Plan, though, does not appear to incorporate these recommendations into specific objectives, standards, or guidelines. Without time-specific actions defined in objectives, it is unclear how the MSO habitat will be properly managed. In addition, the Forest Service should be coordinating with other federal and state agencies who may be doing monitoring to determine the parameters for objectives, standards, or guidelines that specifically address sensitive species. These deficiencies are among the ways the Draft Plan does not comply with the 1982 planning rules or allow the Forest Service to fulfill its obligations under other laws. E.g.,
36 C.F.R. § 219.19.

Another example relates to native fish populations. The Draft Plan notes that 15 of the

16 native fish species in the CNF are federally listed or classified as sensitive. Draft

Plan at 72. The Forest Service links the fate of the native fish to disease and the

amount and attributes of non-native fish, among other factors. E.g., DEIS at 333; 2009

Ecological Sustainability Report at 4-121. This risk to federally listed or sensitive fish species, though, is not adequately addressed in the Draft Plan. The lack of doing so results in the Forest Service not being able to meet its obligations under a variety of laws, including the ESA. Appropriate standards, objectives, guidelines, and management practices to address this issue would allow the Forest Service to meet these legal requirements, as well as address various desired conditions, including those relating to such species, water quality (given the

impacts of non-native species), recreational uses, and others.

KSB is also concerned about changes to how management indicator species (MIS) are addressed from the current CNF plan the Draft Plan. Under the current plan, there are more MIS and the plan ties MIS to management areas, allowing for focused studies and analysis, as well as comparison across areas, which would lend to better management of these important species. By contrast, the Draft Plan addresses MIS forest-wide and is greatly reduced. There does not seem to be a scientific basis for the reduction or the decoupling of species from management areas (and if there is a basis, it is not clear from the Draft Plan or DEIS). In addition, the Draft Plan does not identify MIS for riparian, aquatic, tundra, or wetland ecosystems even though the Forest Service acknowledges the "majority of threatened and endangered species on the forest are associated with perennial streams and riparian habitat." DEIS at 224. Without the appropriate identification of MIS, there will be inadequate monitoring. Also, the plan must prescribe "measures to mitigate adverse effects" on MIS. 36 C.F.R. §

219.19(a)(1) (1982). Given these and other similar concerns related to MIS planning, the Forest Service will not be able to meet its obligations under the ESA and other laws, at least with the Draft Plan.

9. Aquatic Systems

There is little doubt that the aquatic systems within the CNF are significant, not only to the forest and Arizona. They represent some of the most important surface waters and groundwater in the Southwestern United States. These systems also represent a lifeline for mammals, birds and their migration flyways, aquatic species, riparian vegetation and

endangered species. Many of the wilderness areas located in the CNF are there because of the unique surface waters they help protect.

The Draft Plan highlights some of the unique surface waters of the CNF. Oak Creek, Fossil Creek, and West Fork of Oak Creek have been designated as being outstanding state resources, and Arizona has classified them as Outstanding Arizona Waters. There are only two congressionally designated Wild and Scenic Rivers in Arizona-and both are in the CNF: Fossil Creek and the Verde River south of Camp Verde. The Draft Plan indicates there are: "Eleven additional segments in 9 different streams that are eligible for inclusion in the National Wild and Scenic Rivers System, including portions of the West Fork of Oak Creek." Draft Plan at 13. Within the Verde River Basin, the National Forest System is by far the largest land manager. It is therefore incumbent on the Forest Service to integrate them into the water management process of the region and in the Draft Plan.

According to the Forest Service: "Because existing direction outside of the plan was considered to be adequate, additional guidance related to groundwater is not provided under an alternative and, therefore, not analyzed in this environmental impact statement." DEIS at 58. What is the "existing direction" that is referred to in the DEIS? Is it the various Forest Service manuals and an agency technical guide identified in the same paragraph, is it the groundwater code of the State of Arizona, or is it something else?

While these questions need to be answered, our position is that, with regards to groundwater, the conclusion that "existing direction" is "adequate" is not based on the best available science and ignores the broader context. In this manner, it does not comply with the 1982 planning rule or other legal requirements.

The Forest Service clearly understands that there is a proven scientific connection between most of the groundwater and surface water in Arizona. On DEIS page 58 it states: "Since the vast majority of well withdrawals occur off-forest, they are not within the forest's authority to control." What is not said is that these

withdrawals have been and will continue to have an adverse impact on surface water flows and riparian areas both within and outside the CNF. Additionally, the recently released Arizona Department of Water Resources report (Arizona's Next Century: A Strategic Vision for Water Supply

Sustainability, Strategic Vision) makes it clear that there is an anticipated imbalance in

Arizona's future water supply needs.

A critical context for the CNF is that Arizona's Groundwater Code does not protect surface water. In fact Article 17 Section 1 of Arizona's Constitution states: "The common law doctrine of riparian water rights shall not obtain or be of any force or effect in the state."

The Central Yavapai Highlands Water Resource Management Study (CYHWRMS) indicates Yavapai County will have an unmet water demand in excess of 80,000 acre feet due to increasing population. CYHWRMS Phase 1 Demand Analysis Summary at Table 4-1-10. The report highlights that the vast majority of the region's water supply comes from groundwater and unless additional supplies can be found the area will need to increase its groundwater pumping. CYHWRMS Phase 2 Executive Summary at 27. Another option discussed has been to increase recharge amount by thinning treatments on our forests or capture of water during precipitation events. In either case these methods could have a profound impact on the surface waters the Forest Service manages and depends on in the CNF. CYHWRMS Phase 3 Water Supply Alternatives at 89.

In 2012 the Arizona Water Resource Development Commission released its final report, which indicated that within the next 50 years, Arizona's population would grow to over 12 million and would be over 18 million within a hundred years. This additional growth, as well as increased tourism, will place more pressure on the CNF's finite groundwater resources. Commission Final Report Table 1 at 11.

The release in 2013 of United States Geological Survey's (USGS) "Human Effects on the Hydrologic System of the Verde Valley, Central Arizona, 1910-2005 and 2005-2110, Using a Regional Groundwater Flow Model," highlights the impacts that groundwater pumping have already had on in-stream surface water flow. This should also raise questions within the Forest Service on its role in preserving the groundwater resources that the CNF depends on, particularly as it relates to threatened, endangered, or critical species.

As discussed, the Forest Service needs to use the best available science when

developing a plan. That science points to using an "all-lands" approach, which includes

an analysis of how conditions outside CNF may impact CNF and should address those conditions within the Forest Service's control over CNF. It is not apparent from the DEIS or Draft Plan that these conditions are adequately addressed.

One way to address the issue is to use the USGS's "Regional Groundwater-Flow Model of the Redwall-Muav, Coconino, and Alluvial Basin Aquifer Systems of Northern and Central Arizona." This water management tool could help the CNF to meet its desired conditions for water quality, quantity and aquatic systems.

A review of the Draft Plan's appendix D reveals that none of the above studies or

reports was used as source information.

The review of watersheds should be more robust in accordance with 36 C.F.R. 219.23 (1982). For example, the Draft Plan should clearly identify varying water volumes, including extreme events. KSB believes this should integrate the potential impacts of climate change on watersheds and water volumes.

The DEIS states: "Drought conditions have prevailed in most years since about 1999 and may have contributed to decreased precipitation, runoff, and water yield." DEIS at 58. Yet as stated in our comments concerning climate change, there is no indication in the Draft Plan about how the Forest Service will emphasize drought management and climate change into the forest monitoring and management plan.

1. FW-Aq-WAT-G

Current: No guideline concerning involvement with surrounding communities and stakeholders on groundwater management issues.

Proposed Guidelines Water Quantity:

*Coordinate with county and state government, local water resource nongovernmental organizations and interested stakeholders with respect to groundwater and surface water preservation.

*The Forest Service will participate in ongoing efforts to resolve water resource issues in the watersheds that reside in whole or in part within the CNF.

*Within 5 years of Plan approval the Forest Service will identify what scientific studies are needed to determine the amount of water necessary to meet the long-term habitat needs of the CNF, as well as other needs in the forest.

2. FW-Aq-WAT-DC

a) Current: New and existing instream water rights are maintained or procured to ensure that enough water is guaranteed to provide for habitat needs, as well as other needs on the forest, over the long term.

Proposed:

*New and existing instream water rights are procured, instream water rights and groundwater are maintained to ensure that enough water is guaranteed to provide for habitat needs, as well as other needs on the forest, over the long term.

o The Forest Service should add objectives, guidelines, and/or management approaches as appropriate to explain the criteria it will use to determine which rights it will seek and how it will seek the rights. This should include a detailed analysis of water supply in the CNF.

*Objective: A well monitoring system shall be developed within three years in the forest to determine if surrounding groundwater pumping is having an impact on the CNF's groundwater resources. [Note: If the Forest Service is currently monitoring wells on the forest, then it should determine if those wells are in locations that provide the information necessary to identify forest-wide trends or watershed trends, especially as relates to desired conditions.]

b) Current: Water quantity (base flows) of intermittent and perennial streams are seasonally sustained while peak flows and flood potential occur within the historic range of variability for that stream system.

Proposed:

*Develop an objective and standard for this desired condition.

*Water quantity (base flows) of intermittent and perennial streams are seasonally sustained while peak flows and flood potential occur within the historic range of variability for that stream system. The Forest Service will develop a monitoring program to determine if base flow levels are being maintained and to identify management options when base flows are not being maintained.

Among other activities, doing the above would help the Forest Service address its obligations under the 1982 planning rule, which requires that a plan appropriately monitor. 36 CFR § 219.12(k) (1982).

In the DEIS, the Forest Service Manual (FSM 2521.1) is used to indicate watershed conditions. DEIS at 59. The section further identifies that, of the forest's "6th code" watersheds, 65 percent are functioning-at-risk and 14 percent are impaired. According to Table 3 on page 60, of the 120 6th code watersheds, 98 are either functioning-at-risk or impaired. The question becomes: How is the Forest Service going to meet its three desired conditions under FW-WtrShd-DC given these watersheds have been functioning at these levels for decades and there has been insufficient funding to mitigate the underlying issues? This should be discussed in the Draft Plan.

We wish to reinforce our concerns about groundwater planning and monitoring within the Draft Plan. Any further decrease of instream base flows could lead to higher levels of TMDLs and therefore make it harder for the CNF to reach desired conditions for watersheds and water quality.

The Draft Plan inadequately addresses the CNF's riparian zones, which are "more productive per acre in biomass of plants and animals than other vegetation communities, and they . . . add[] significantly to . . . ecosystem diversity." Draft Plan at

22. This biomass and diversity includes federally listed and sensitive species. Approximately 23% of riparian areas are "functioning at-risk," and six percent are "nonfunctional." DEIS at 67. These at-risk and impaired areas are threatened by, among other issues, a poor history of road creation and use, dispersed recreation, and grazing. DEIS at 68. While there are seven desired conditions in the forest-wide

section regarding "stream ecosystems" (Draft Plan at 23), there are no standards (let alone objectives, guidelines, or management approaches) for this, the most productive of vegetation communities, or to address the known threats to riparian areas. This does not meet the requirements of the 1982 planning rule or the requirements or intent of other laws, such as NFMA, ESA, and NEPA. E.g., 36 C.F.R §§ 219.27(e), (f) (1982).

KSB requests the Forest Service use the best available science to develop appropriate standards and other planning tools that adequately protect riparian zones, including considering many of the issues and planning tools described in Alternative D of the environmental impact statement associated with the 2012 planning rule. 75 Fed. Reg.

26,711, 21,170-71 (May 12, 2010) (noting Alternative D may be appropriate at the plan level for certain areas; KSB is not in a position at this time to fully analyze what parts of Alternative D are most applicable, but KSB notes Alternative D is more robust than what is currently in the Draft Plan). Doing so appropriately will allow the Forest Service to meet its legal obligations under ESA, NMFA, NEPA, and other statutes and regulations; meet the 1982 planning rule requirements; and monitor for and show progress toward desired conditions for riparian areas, which contribute "significantly to . . . ecosystem diversity." Draft Plan at 22.

B. COMMENTS BY CHAPTER

To the extent possible, the following comments follow the organization of the Draft Plan. KSB has cited the plan reference and location. We have then quoted the language from the Draft Plan and explained our issue or concern. Then generally we have provided an alternative and/or suggested language to correct or improve the cited section. These comments should be seen as examples of issues that may appear elsewhere in the Draft Plan.

CHAPTER 1

1. Public Notification.

Reference: "Plan Content" Chapter 1, page 5.

Language: "The public will be notified of all plan amendments and administrative corrections."

Issue: Amendments and administrative corrections are tools with which the Plan can be changed: temporarily by site- and project-specific amendments or permanently by programmatic amendments. Amendments thus can change the management approach, while Administrative Corrections generally do not. It is important that the public be informed about the rules and regulations pertaining to Corrections and Amendments, and so it is necessary that the Plan outlines the rules for the amendment process and provides a reference where the process can be found in detail.

No indication is given whether this notification is after or before the amendments and administrative corrections have been made. The Draft Plan should insert reference where the rules and regulations pertaining to such amends can be found, or at least state whether there is the opportunity for public input, what the time frame for such input is, where the announcements are made, and where additional information can be found. All documents related to any such changes should be made available in a discrete location (e.g., same website page) with the notice of the change.

Alternative: The public will be notified of proposed administrative corrections and the reason for the corrections by publication on the CNF's Website and in a local newspaper. The public will have a 30-day comment period following publication. (See p. 10 of the Plan for more detail or, for complete Rules and Regulations, Federal Register, 2012, Vol 77, No 68 paragraph 219.16, p. 21269-21675). If there is a website link to these Rules and Regulations, add the link.

2.Public Notification.

Reference: Future Changes to the Plan p. 10, first black bullet

Language: "Site-specific plan amendments occur to allow specific projects or other activities to deviate from certain plan direction. These amendments occur only for a specific area or a specific project. They do not lead to permanent changes in plan languageSuch amendments are usually proposed with appropriate [NEPA] analysis for the site-specific project proposal. The procedures for processing a site-specific plan amendment are outlined in the applicable planning regulation."

Further, p. 10, second black bullet language: "Programmatic plan amendments permanently change the text and language of the plan decisions identified in the earlier section "Plan Decisions" and any other changes that cannot be addressed through administrative corrections or site-specific plan amendments. The procedures for addressing a programmatic plan amendment are outlined in the applicable planning regulation."

Issue: As per above texts, it is clear that Amendments represent a way to allow specific projects to deviate from the Plan (site-specific amendments), or to permanently change the text and language of the Plan. In other words, amendments may change site-specific and project-specific management approaches temporarily or change Plan management approaches permanently. The Plan should therefore spell out the time line for the amendment process and summarize the rules for notification of public and the public input process. Reference to "applicable planning regulation" is not adequate, especially since there is no link given for accessing those regulations.

Alternative: At the minimum, give information about public notification: where the notification will be published, beginning, duration and end of comment period (at least 30 days if no EIS is prepared, or 90 days if draft EIS is prepared, as per paragraph 219.16, p. 21269, Federal Register, 2012, Vol 77, No 68); how much time after the comment period until amendment is approved and how much time until amendment becomes effective. Full process description can be found in Federal Register, 2012, Vol 77, No 68, p. 21269-21675). If there is a website link to these Rules and Regulations, add the link.

CHAPTER 2

3. Soil

Reference: FW-Soil-DC, #4, page 17

Plan Language: "Biological soil crusts are present with limited soil disturbance

(<1/3 of area impacted) and functioning on coarse textured and sandy soils."

Issue: Biological soil crusts are an essential part of a healthy desert ecosystem.

"They hold soil in place, help retain moisture, and improve soil nutrients by fixing

atmospheric nitrogen." Draft Plan at 191. It is extremely difficult to restore them or recreate their benefits. The Draft Plan includes the following guideline: "To preserve biological soil crusts, disturbance should be minimized in areas where the percentage of biological soil crusts exceeds 5 percent."

Alternative: KSB requests the Forest Service consider a lesser degree of disturbance (using the best available scientific data) and educate the public as to the basis for its proposed amount of allowable disturbance. KSB also requests the Forest Service consider more robust standards and guidelines related to this vital resource that is so difficult to restore that it should perhaps be considered non-renewable.

4. Wildlife, Fish and Plants.

Reference: FW-WFP-G, page 74, #4

Plan Language: Seasonal timing restrictions should be applied for threatened, endangered, and sensitive species; bats; and Golden eagles to protect known nests, roosts, and other special features from habitat alteration and/or disturbance from management activities to avoid disruption of species or their habitats that could affect survival or successful reproduction.

Issue: There seems to be no concise, time-specific statement of measurable results in this Guideline.

Alternative: Add an Objective that gives a concise, time-specific statements of measurable results, such as, "Within three (3) years of plan approval, implement seasonal timing restrictions for threatened, endangered, and sensitive species; bats; and Golden eagles to protect known nests, roosts, and other special features from habitat alteration and/or disturbance from management activities to avoid disruption of species or their habitats that could affect survival or successful reproduction."

5. Wildlife, Fish and Plants.

Reference: FW-WFP-G, page 75, #7

Plan Language: Where native frogs and toads occur, established protocols should be followed to prevent the introduction and spread of a chytrid fungus (*Batrachochytrium dendrobatidis*) that kills amphibians.

Issue: The Guideline does not stress the importance of following protocols to prevent the introduction and spread of a chytrid fungus. Amphibian populations are plummeting, and the aggressive chytrid fungus is often to blame.

Alternative: Replace the Guideline with a Standard that mandates compliance with established protocols to prevent the introduction and spread of a chytrid fungus as soon as the plan is approved. This replacement would fulfill the requirements of 36 C.F.R. Section 219.27(a)(3) (1982) by trying to prevent or reduce hazards from pests.

Also, add to "Management Approaches for Wildlife, Fish, and Plants: "Collaborate with amphibian researchers and biologists to save species threatened by chytrid fungus."

6. Invasive Species.

Reference: FW-Invas-G, page 77, #2

Plan Language: Integrated pest management approaches and other treatments to control invasive species should be used to improve watershed condition and maintain ecosystem function while minimizing project impacts on native species.

Issue: The Guideline does not contain a time specific statement of measurable, anticipated results.

Alternative: Add an Objective such as, "Implement integrated pest management approaches and other treatments to control invasive species within three (3) years of plan approval."

7.Forest Products.

Reference: FW-FProd-DC, page 82, #4

Language: Collection of forest botanical products is authorized by permit and only when information is available to ensure the product will persist on the forest. Collection of plant species recognized as rare, limited in distribution, threatened, endangered, or sensitive is discouraged except for scientific and cultural purposes.

Issue: Collection of species that are rare, limited in distribution, threatened, endangered, or sensitive is too weak. The collection of those species should be authorized only by permit.

Alternative: Change the wording to the following: Collection of forest botanical products can occur only when authorized by permit. The permit can be issued only when the permit applicant demonstrates the product (that is, the plant species) will sustainably persist on the forest after the collection. For plant species recognized as rare, limited in distribution, threatened, endangered, or sensitive, permits can be issued only for scientific and cultural purposes and only when the permit applicant demonstrates the product (that is, the plant species) will sustainably persist on the forest after the collection.

8.Roads.

Reference: FW-RdsFac-DC (p 91) #1

Language: "[Roads] expand and contract commensurate with use and needs,
and it balances the desire for public access with potential for ecological impacts."

Issue: This language does not specify in sufficient detail the need to preserve scenic integrity in any road expansion or work related to roads.

Alternative:After cited plan language, add:Preservation of scenic and environmental integrity and beauty is paramount in any work described above.

Additionally, the Forest Services needs to review the FW-RdsFac-G Guidelines for

Roads and Facilities to reassess their classification. Many of these should be standards

and should be phrased as requirements rather than items that are to be considered (in other words, to use "shall" or "must" instead of "should"). The standards need to also cover the re-establishment of vegetative cover under 36 C.F.R. 219.27(a)(11). Additional guidelines with details of how the standards can be met can then be added.

9. Roads and Facilities.

Reference: FW-RdsFac-DC, roads page 91, #3

Language: Travel restrictions are clearly understood by forest visitors. Roads to private property provide reasonable access but do not necessarily provide for comfort or all-weather access. Roads that are under easement or special use permit are maintained to Forest Service standards by the permittee or easement holder.

Issue: There needs to be a Management Approach for Roads and Facilities to help forest visitors understand the travel restrictions.

Alternative: Add a Guideline for Roads and Facilities: The Forest Service will implement an outreach program to educate the forest visitors with information about the travel restrictions on certain roads.

10.Roads and Facilities.

Reference: FW-RdsFac-DC. #4. Page 91, #4

Plan Language: Temporary roads that support ecosystem restoration activities, fuels management, or other short-term projects fare rehabilitated promptly after project completion. Unneeded roads are closed and naturalized to reduce human disturbance to wildlife and to reduce soil erosion. Some closed roads are converted to motorized trails or nonmotorized trails for recreational use.

Issue: There are no standards or guidelines for determining which roads are converted to motorized trails or nonmotorized trails for recreational use. There needs to be standards or guidelines to protect the ecosystem from motorized trails.

Alternative: Change the wording of the last sentence in the Draft Plan from

"Some closed roads are converted to motorized trails or nonmotorized trails for

recreational use." To the following: Some closed roads are converted to nonmotorized trails if the ecosystem will not be disturbed. Before converting any closed road to a motorized trail, studies need to be conducted to confirm the ecosystem and wildlife will not be disturbed by motorized use, including noise emissions and related results of such use.

Another alternative would be to establish a Guideline that states: "Closed roads should not be converted to motorized trails where wildlife, threatened, endangered, and sensitive species are present."

11.Land Adjustments.

Reference FW-LndAdj-DC-2 p. 95

Plan language: Reasonable access is provided to private inholdings

Issue: 'Reasonable' is too broad and too subjective a term. Moreover, it does not identify whether access entails permit for accessing via existing roads or construction of new roads, nor does it specify reasonable to whom - the private landowner or the FS.

Alternative: Where roads already exist to the inholding, access is given for travel on such roads. Construction of new access roads must follow Guidelines for Land Adjustments FW-LndAdj-G3 and G4. (p. 96) Suggested wording for new G4: "Construction of new access roads must take into consideration that such access does not conflict with the area's desired condition; does not degrade scenic value of area; does not degrade sensitive areas; does not degrade intrinsic character (e.g., Wilderness, Primitive or Semi-primitive character) of affected area; does not negatively impact water resource areas including perennial and ephemeral streams and their respective riparian zones by river or stream crossings or by bridge construction. New road construction will require an EIS and public input."

12.Land Adjustment.

Reference: FW-LandAdj-G (Plan pg. 96, #2)

Plan Language: willing to exchange land that: "has lost its wildland characteristics" or is "needed to meet the needs of communities and the public . .
."

Issue: While there are more restrictive provisions on exchanges/adjustments in the Sedona MA, this language is still too vague and permissive and could create confusion if seen as conflicting with the more restrictive language. If land has lost its "wildland characteristics" through neglect, for example, this should not support the right of the Forest Service to then sell or dispose of the land. So, too, the public may claim it "needs" this land, but effort should still be made to preserve the scenic areas and find alternatives for public use outside of the management or forest area.

Alternative: Add language in Chapter 2 (Forestwide) that emphasizes that in any situation where the Forest Service is facing a request or considering the sale or disposal of forest land, that it should make every effort to retain the land so that the land does not decrease in size or scenic quality.

13.Land Adjustments.

Reference:, p.96, first paragraph under above heading

Plan language: "Consult with local governments about land adjustment proposals the forest plans to take forward into the process. Public input on land exchange begins at the time a site-specific land exchange is proposed."

Issue: There is a change in term used: 'adjustment' in first sentence and

'exchange' in the second. Implies different categories: meaning land adjustment

is not necessarily the same as land exchange.

Alternative: if 'adjustment' and 'exchange' were meant to be interchangeable here, use only one or the other term so as not to confuse the reader. These issues should be reviewed elsewhere in the Draft Plan where these terms are used.

14.Related Plan Content.

Reference:"Related Plan Content for Land Adjustments" (Ch. 2 Forestwide Management I- pg. 97)

Plan Language: Reference "Sedona Neighborwoods Management Area"

Issue: wrong cite

Alternative: Change to "Sedona Oak Creek Management Area."

15.Aircraft.

Reference: FW-SpecUse-S (Plan page 99, #1); FW-SpecUse-G (Plan page 100, #8)

Plan Language:

Standard: "Prohibit motorized aircraft landings and takeoffs [on NFS land].

Guideline: "Aircraft activities related to commercial filming should be restricted..."

Issues: These are too weak. They do not address helicopter traffic and do not discuss low-flying planes/helicopters. The Guideline is limited to commercial filming rather than other potential activities in the air. Noise and disturbances from frequent and low-flying aircraft has been an increasing problem to those seeking to enjoy wilderness hiking and camping.

Alternatives: There should be specific directions on limitations of scenic/tour flights by planes or helicopters. These should include frequency, noise and location (height and place). While KSB believes that these should be forest- wide, they should at least apply to the Sedona/Oak Creek Management Area. There may need to be coordination with the FAA but that, too, should be spelled out in the standard and guideline. Restrictions related to wilderness areas should be drafted as standards. While KSB thinks restrictions related to other areas of the forest should also be standards, guidelines may be more appropriate for non-wilderness areas.

16.Dispersed Recreation.

Reference: FW-Rec-Disp-DC Motorized Recreation, p. 104, #6

Plan Language: Adequate signage is provided to advise the public of where motorized vehicles are permitted. Information kiosks are located at main entry ways onto the forest with pertinent motorized recreation information. Information is provided for OHV recreationist and trail users, including maps and signs that provide road and trail information and explain national forest regulations for such activities as OHV travel and camping and trail opportunities. Orientation information and interpretation is provided at sites that receive high levels of visitation.

Issue: We support this Desired Conditions, but a Management Approach for Dispersed Recreation should be added to educate forest visitors and specify on which trails motorized vehicles are permitted.

Alternatives: Add Management Approach: Provide leadership to educate the recreational outfitters and forest visitors on which trails motorized vehicles are permitted and on which trails motorized vehicles are not permitted.

17. Interpretation and Education.

Reference: FW-Rec-Disp-DC, p. 104, #8

Plan Language: Forest Service communications.....There is little human litter as a result of effective enforcement, patrols, and use of refuse and recycling facilities.....to practice careful stewardship.

Issue: We support this Desired Condition, but a Management Approach for Interpretation and Education should be added to educate forest visitors of the importance of not littering.

Alternative: Add Management Approach: Provide leadership to educate the recreational outfitters and forest visitors the importance of no human litter and to be aware of "Leave No Trace principles".

18. Dispersed Recreation.

Reference: FW-Rec-Dis-G, page 108, #10

Plan Language: Except in the Long Valley MA, dispersed camping should be provided near but not within 200 feet of riparian, shoreline, or aquatic resources (per Leave No Trace principles) to provide overnight dispersed recreation opportunities.

Issue: There is no Management Approach to educate campers about no dispersed camping within 200 feet of riparian, shoreline, or aquatic resources.

Alternative: Add Management Approach: Coordinate with the recreational outfitters, forest visitors, Arizona Game & Fish Department, Arizona State Parks and National Park Service to educate forest visitors and dispersed campers not to camp within 200 feet of riparian, shoreline, or aquatic resources (per Leave No Trace principles).

19. Special Uses.

Reference: FW-SpecUse-DC, Land Special Uses, page 97, #2

Plan Language: Utility lines, such as pipelines, power lines, fiber optic lines, and telephone lines, are buried

unless there are overriding environmental or technical concerns that would prevent burial. Vegetative clearing for utility and energy transmission corridors provide an aesthetic edge effect. The location of new, large linear infrastructure such as power lines has minimal effects to wildlife and minimizes habitat fragmentation.

Issue: We strongly support the first sentence above. The second sentence above does not ensure that scenic integrity is preserved... "Vegetative clearing for utility and energy transmission corridors provide an aesthetic edge effect."

Alternative to second sentence: Minimize vegetative clearing for utility and energy transmission corridors to enhance natural features and beauty and preserve scenic integrity.

20. Special Uses.

Reference: FW-SpecUse-DC, Land Special Uses, page 98, #3

Plan Language: (The last sentence) Power lines and towers are built

(construction or reconstruction) to specifications compatible with raptor use.

Issue: This language does not state that the power lines should be buried unless there are overriding environmental or technical concerns that would prevent burial.

Alternative: The last sentence should read: "Power lines and towers are built (construction or reconstruction) to specifications compatible with raptor use. The power lines should be buried unless there are overriding environmental or technical concerns that would prevent burial."

21. Recreation Special Uses.

Reference: FW-SpecUse-O-1 (p. 99)

Plan Language: Identify 4 pre-approved sites for recreation events and large group gatherings within 10 years of plan approval.

Issue: Such sites might not be appropriate for Special Designation areas and hence may not apply to Sedona/Oak Creek Management Area. No information is given regarding by what process (e.g., will there be public input?) and criteria to determine whether such sites were or will be pre-approved. Nor does it identify any pre-approved sites or, if not known yet, in what regions they would be located. The following issues should also be considered and addressed in the objective: Could sites be close to one another? Would sites include parking, transportation, and other infrastructures to be built? Will the sites need drinking water (well, pipeline, water quality testing for drinking water required?) or a waste water treatment facility?

Alternative: Provide transparency about the process of identifying such sites, about the infrastructure required, how they would be used or what they would be used for, who the potential users would be, and how the public will be involved in their identification and selection. For Special Designation areas, exclusionary guidelines should be added, i.e. none should be located in the Sedona Oak Creek MA.

22.Scenic Resources.

Reference: FW-Scenic-G #6, p. 115

Plan Language: ... the evidence of these activities should be restored following completion of the activity to harmonize with the surrounding landscape.

Issue: There needs to be a time limit for the following completion of activity.

Alternative: The area will be restored as soon as reasonably possible after the completion of the project.

23.Scenic Resources.

Reference: FW-Scenic-G #9, p. 115

Plan Language: ... may accommodate additional capacity within the existing corridor.

Issue: Powerline areas that may accommodate additional capacity within the existing corridor should be required to bury the lines underground when possible. Alternative: Reword to require powerlines to be buried in existing corridors when possible.

CHAPTER 3

24.Scenery.

Reference: MA-SedOak-DC-9, p. 132

Plan Language: The unique geology and local rock formations of Red Rock

Country make it a multicultural landscape that has been recognized for centuries.

Issue: Text duplication. Part of that sentence is repeated verbatim in the next sentence.

Alternative:Delete the entire sentence because the next sentence better expresses the intent.

25.Trails.

Reference: MA-SedOak-DC (#14)

Language: Unneeded nonsystem trails are discouraged. Trails that duplicate system trails or cause damage . . . are rehabilitated. A network of primarily nonmotorized trails provides opportunities at multiple development levels for hikers, OHV recreationists . . .

Issue: The desired condition should be the elimination of unneeded nonsystem trails - not just discouragement. Trails should be rehabilitated as soon as possible. The OHV reference should be eliminated since the sentence discusses nonmotorized trails.

Alternatives:

Unneeded nonsystem trails are prohibited or eliminated.

Trails that duplicate are rehabilitated as soon as possible.

Delete: "OHV recreationists"

26.Road Access.

Reference: MA-SedOak-DC (#22)

Language: -There are some inconsistencies in social encounters and road access that are recognized and expected to continue:

*Future development of State Highway 179

*The level of use on the main four-wheel drive road [at Broken Arrow] is higher than generally desired for semiprivate motorized areas

Issue: This is not a Desired Condition, but rather an acknowledgment of a problem with the forest. A Desired Condition should not state that it expects an inconsistency to continue. If the level of use of the Broken Arrow trail is higher than desired, then steps should be taken to reduce the usage - not to say that it will continue.

Alternative: If the Draft Plan wants to note these "inconsistencies" then it should

also state that the goal (i.e. Desired Condition) is to improve upon the current

situation and eliminate the problem. There also are no plans to develop Rt. 179 beyond its current state, so this should be deleted. In addition, there should be objective(s) added to reach the desired condition within a specified timeframe.

27.Dispersed Recreation.

Reference: MA-SedOak-DC, #24, p. 134

Plan Language: "New outfitter-guide permits are issued for activities that have demonstrated public need, promote transportation services or public safety, or substantially increase protection of cultural or natural resources ..."

Issue: Emphasis should be on protection. Don't make it an option/choice (i.e. "or").

Alternative: 1) End sentence with "public safety." 2) Add sentence: "Any new permit should maintain or increase the protection of cultural and natural resources."

28.Special Uses.

Reference: MA-SedOak-DC 25, p. 134

Plan Language:"... motorized tours, do not impact the ability of other forest users to have these experiences.

Issue: after motorized tours - add: including airplanes or helicopters

Alternative: after motorized tours - add: including airplanes or helicopters

29.Dispersed Recreation.

Reference: FW - SedOak - O - (Draft Plan pg. 136)

Plan Language: "Within 10 years of plan approval, develop Schnebly Hill Vista as a viewpoint, interpretative site, and possibly a trailhead."

Issue: First - this designation should be "MA" and not "FW" - i.e., it addresses the Sedona/Oak Creek Management Area and is not forest wide.

Second, This objective is confusing as worded.It could be read as authorizing/requiring the improvement of the Schnebly Hill Road to allow paved

travel to the viewpoint. There is concern about the extent to which motorized traffic could/should have access to the viewpoint at the Merry-Go-Round at the top of the hill.

Alternatives:

a. Eliminate this objective. The present state of the site is adequate and there could even be a limitation on the type and number of motorized vehicles at the site. Keep it primarily for hiking and biking access.

b. Clarify the objective. This would not require the improvement of the current road, for example.

30.High Priority Parcels.

Reference: MA-SedOak-S-8, p. 136.

Plan language: "High-priority private parcels total approximately 95 acres (see Appendix A in the proposed plan, map 13, p. 229). High-priority land acquisition parcels include: Lincoln Canyon (25 acres) and Hancock Ranch (70.3 acres)."

Issue: (a) according to total acreage of 95 acres, Lincoln Canyon and Hancock Ranch are the only high-priority parcels ('include' is inappropriate verb). (b) inconsistency: Cockscomb area is indicated as High-priority Acquisition Land on Map 13, p. 229, but not in text.

Alternative: If Map 13 is incorrect, then just replace "include:" with "are" and eliminate Cockscomb area as High Priority Acquisition Land from Map 13. If Map 13 is correct, change wording and acreage accordingly in text.

31.Scenery.

Reference: p. 137 - MA-SedOak-G-2

Plan Language: The scenic integrity objective for public utilities should be no less than moderate when viewed from Concern Level 1 and 2 travelways.

Issue: SIO level is set too low. More than 50% of the Sedona/Oak Creek MA has an SIO of High or Very High, and travelways in these areas hence are Concern Level 1 routes, i.e., visitors have a high interest in scenic quality.

Alternative: replace "no less than moderate" with "no less than high".

32.Motorized Recreation.

Reference: p.137 MA-SedOak-G7

Plan Language: Vehicle crossings of Dry Creek should be prohibited unless appropriate water quality protection measures can be implemented

Issue: If there is concern about negative impact on water quality by vehicular crossing of Dry Creek, vehicle crossing should not be permitted at all.

Alternative: This should be a standard rather than a guideline. Alternate language for a new standard: Because of concern for water quality, vehicular crossings of Dry Creek shall be prohibited and indicated by appropriate signage at the relevant locations. In addition, motorized travel maps and travel guides issued by the CNFS will mention such prohibition for the Dry Creek Area with educational text about the lasting damage

vehicles can cause when crossing dry or wet streambeds.

33.Land Adjustments.

Reference: MA-SedOak-G-14, p. 138

Plan language: National forest parcels less than or equal to 10 acres in size in the Sedona/Oak Creek MA could be disposed of under the Small Tracts Act of 1983 (P.L. 97-465), Townsite Act of 1958 (P.L. 85-569), or General Exchange Act of 1922 (U.S.C. 16 485,486) to resolve encroachment issues or provide lands needed for public purposes.

Issue: No limit is given to the number of parcels that could be disposed of under the cited Acts - this could potentially be abused and add up over time. Providing lands for public purpose such as schools or utilities is already covered.

Alternative:

- a. Remove this provision altogether.
- b. If it is kept in the Plan, then add language that "in any effort to dispose of land under any one of these cited statutes there will be an effort made to

preserve both the size and scenic integrity of the area consistent with the stated goals, desired conditions and standards of this plan."

34.Roads.

Reference: MA-SedOak-G-18, p. 138

Plan Language: Dry Creek Road (FR 152) "...allows access by the careful driver of a standard low clearance vehicle."

Issue: This is not possible and is inconsistent with desired conditions.

Alternative: Eliminate this language.

35.Scenic Resources.

Reference: General Description for Sedona Neighborwoods Management Area

Language, p. 140.

Plan Language: ...The desired conditions for scenery from Sedona/Oak Creek and Oak Creek Canyon MA may

also apply to the Sedona Neighborwoods MA if the site being analyzed at the project level fits the landscape character described for those management areas.

Issue: the wording needs to be changed from "may" to "shall".

Alternative: Insert "shall" for "may".

36.Scenic Resources.

Reference: General Description for Oak Creek Canyon Management Area

Language, p. 141.

Plan Language: The desired conditions for scenery from this management area may also apply to the Sedona Neighborwoods MA if the site being analyzed at the project level fits the landscape character described for those management areas.

Issue: the wording needs to be changed from "may" to "shall".

Alternative: Insert "shall" for "may".

37.Scenic Resources.

Reference: General Description for House Mountain-Lowlands Management

Area Language, p. 144.

Plan Language: The desired conditions for scenery from this management area may also apply to the House Mountain-Lowlands MA if the site being analyzed at the project level fits the landscape character described for those management areas.

Issue: the wording needs to be changed from "may" to "shall".

Alternative: Insert "shall" for "may".

38.Wilderness

Reference: Strawberry Crater Wilderness General Description (p. 153); SA-Wild- Straw-DC # 2 and #3 (p. 154)

Plan Language:

General Description: "Because of the relatively open terrain and easy access

from major roads, motor vehicle intrusion into the wilderness is an issue."

DC #2: "Vehicle intrusions are rare and signing, fencing, and wilderness patrols on the boundary effectively enforce restrictions."

DC #3: "The construction of barriers and signage along the wilderness boundary prevent motor vehicle intrusion along the south and west boundaries of the wilderness. Educational materials about the sensitive soils and plants are provided to visitors."

Issue: It is unclear whether motor vehicle intrusion is an actual issue (as seems to be described in the General Description) or a potential issue. If it is an actual issue, the DCs are insufficient to actually address a known issue.

Alternative: If vehicle intrusions are not an issue, please explain to the public how that was determined and then delete the above-referenced sentence in the General Description. If intrusions are an issue, then the Forest Service needs to

draft objectives and consider drafting standards or guidelines to address this issue.

39.Scenic Resources.

Reference: Map 15 Scenery Management-Scenic Integrity Objectives, p. 231

Issue: Areas on State Route 179, between the Village of Oak Creek and Sedona City limits includes a Forest Service Designated Scenic Byway. The area to the east is designated as very high SIO. The area on the west is currently only identified as high SIO. This area includes Cathedral Rock and other red Rock formations that should be classified as very high SIO. Similarly there are areas along Verde Valley School Road north of the Village of Oak Creek with significant red rock formations including House Mountain, Cathedral Rock and Oak Creek.

Alternative: These are currently classified as high SIO - they should be very high SIO. Additionally the area around Schuermen Mountain should be designated as very high SIO.

40.Motorized Travel.

Reference: Appendix F. Forest Plan Language for Alternatives. DEIS at 972-73 (Alternative D).

DEIS Language: a) "any reroute of power lines or expansion of capacity for existing power line corridors should avoid or reduce scenic impacts to [noted areas]. Projects that avoid these areas but cause impacts to scenery elsewhere may change Scenic Integrity Objectives to "Moderate" or "Low"."

b) Table 4 (p. 973) would allow Mechanized Travel in Botanical and Geological

Areas.

Issue: Both of these provisions in Alternative D would significantly impact the scenic integrity of the forest and allow both power lines and mechanized travel in areas that diminish the beauty and serenity of the area.

Alternative: Do not adopt any of Alternative D. In particular do not adopt either of these concepts.

DEIS

The map legends for ROS Recreation Opportunity Spectrum on pages 785, 786, 787, and 788 are incomplete and/or inaccurate. The maps display patterns that are not found in the legend, and the legend displays a pattern (semi-primitive motorized --green with dots) that is not found on the maps (presumably the green-with-faint-small-white grid areas represent the semi-primitive motorized).

Thank you for reviewing, considering, and incorporating our comments into the next draft of the plan to manage the CNF, the land of the American people, in the most environmentally sound way.

We would like to acknowledge the support of our members and, especially, the following people for their extensive contributions to these comments:

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