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Title:

Comments: Support Wildlife and Sustainable Recreation in Coconino National Forest

Dear Ms. Lewah Lau,

I am writing in response to the draft plan and environmental impact statement for Arizona's Coconino National Forest. As you develop the plan, I ask that you incorporate the following comments and protect our natural ecosystems and wildlife.

The vast majority of people who visit the Coconino engage in quiet recreation activities like hiking, camping and birding. But lack of enforcement of motorized vehicle trails has led to increased degradation of our public lands. The Forest Service is not likely to receive additional funding or personnel to combat this issue, and so the new plan should not call for any more motor vehicle trails, and should curtail such activities in areas where misuse and lack of enforcement is known to be a problem.

The U.S. Fish and Wildlife Service determined in 1996 that discretionary guidance alone in forest management jeopardized the existence of several species, including threatened Mexican spotted owls. At present 90 percent of native fish species in the Coconino, including the razorback sucker, loach minnow and spikedace, are federally listed as threatened or endangered. More protective requirements -- not fewer -- are needed to ensure they survive. The current forest plan incorporates many standards and guidelines to protect species such as the northern goshawk. But the new plan should additionally require implementation of formal recovery plans, rather than merely referencing them, and retain the existing binding standards and guidelines that were designed to ensure at-risk plants and animals are protected.

Past logging in northern Arizona has also destroyed most of the historic ponderosa pine and mixed conifer old-growth forests. But large, old trees are critical for the habitat they provide to wildlife and for their assistance in nutrient cycling and water filtration. Large, old trees can also help mitigate climate change by storing much larger quantities of carbon from the atmosphere. The new forest plan should require retention of large, old trees while also emphasizing old-growth recovery. And the plan should prohibit commercial timber harvests and road construction in recently burned forests for purposes other than public safety.

Finally, livestock grazing is the most widespread and ecologically damaging use of national forest lands in the American Southwest. And climate change will only increase the intensity of grazing effects on soil, vegetation and wildlife. Substantial damage to vegetation and water resources already exists due to past grazing practices; the new forest plan should restrict the extent and intensity of livestock grazing to allow vegetation and aquatic ecosystems to recover, and it should prohibit grazing near rivers and streams.

Thank you for considering these comments, and for your hard work as an environmental steward of our public lands.

Sincerely,

Kaye Gucciardo

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