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Title:

Comments: Neil Bosworth and Reviewing Officer-Tonto Forest Plan Revision2324 E. McDowell RoadPhoenix, AZ 85006Uploaded to CARA on August 26, 2022Subject: Objections to The Final Revised Land Management Plan (LMP), Final Environmental ImpactStatement (FEIS), and Draft Record of Decision (Draft ROD) for the Tonto plan revisionThese objections are being submitted on behalf of Tonto Recreation Alliance by:Richard Smith8110 S College AveTempe, AZ 85284info@tralaz.org480-213-5826Comments were filed by Tonto Recreation Alliance during the comment period for the Tonto Forest Draft Forest Plan (DFP) and Draft Environmental Impact Statement (DEIS) on March 11, 2020 and these objections relate to comments previously submitted. The document containing these comments is attached to this objection document.Please see the following pages for a description of objections.Thanks for the opportunity to comment and object during the development process of the Tonto Forest Plan.These objections relate to the Recommended Wilderness Areas (RWMA) section of the Tonto National Forest Land Management Plan.We previously commented on this section of the draft plan with the following from Attachment 2 of our comment document:6. Recommended Wilderness Areas (RWMA): Page 133: Recommended Wilderness Areas (RWMA): Page 133: The commenters do not support any recommended wilderness management areas that would impact motorized recreation on existing routes approved in the travel management decision. Specifically, we do not support any RWMA's that create an envelope around routes designated as open in the Travel Management Plan even if the route has a protecting corridor buffer zone. This type of action effectively prioritizes wilderness over the established motorized recreation route system that was 10+ years in the making and creates potential conflicts even when an open motorized route is protected by a corridorWe still stand by the comment that wilderness areas should not be designated in areas where motorized routes have been designated by the Tonto Travel Management Decision. Several of the recommended wilderness areas in the plan contain roads and trails that have been designated as open. This approach is in direct conflict with the fundamental character that makes a wilderness area desirable. We request that wilderness areas containing designated motorized routes be eliminated from the plan.Corridors in Recommended Wilderness Areas Not Drawn CorrectlyNot withstanding the above objection, there are issues with the location of corridors drawn around designated motorized routes in the recommended wilderness areas.Tonto Recreation Alliance has done extensive inspection and monitoring of motorized routes in the Tonto National Forest. We have captured tracks representing the actual locations of most routes designated as open through the Travel Management Process. A comparison of the actual location of motorized routes vs. Tonto National Forest GIS data and the related recommended wilderness area corridors shows issues with the drawing of these corridors.This objection does not list all of the issues with these corridors but only shows a few illustrative examples. TRAL's GPS data is available upon request to the Tonto for use in correcting the locations of the corridors.We request that the Tonto use TRAL's data representing actual locations of motorized routes to check and correct the locations of corridors drawn around motorized routes in the Recommended Wilderness Areas.See examples of Recommended Wilderness Area motorized route corridor issues on the following page.Examples of Issues with the Recommended Wilderness Area Buffers Drawn to Exclude Motorized RoutesThe examples below show issues with the drawing of corridors and buffers around the GIS data representing motorized routes in or near Recommended Wilderness Areas.The green shaded areas are the Recommended Wilderness Areas from the Tonto's data. The gray lines are the Tonto's GIS data representing the assumed locations of motorized trails designated through the Travel Management Process. The red lines are TRAL's data showing actual locations of these motorized routes on the ground. TRAL's GPS captured route locations are also supported by satellite imagery.It can be clearly seen that the corridors and buffer areas meant to exclude the motorized routes are not in the correct locations based on actual location of the routes. The green Recommended Wilderness Areas overlap several sections of the actual route locations.