



May 21, 2019

Neil Bosworth  
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Tonto National Forest  
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Phoenix, AZ 85006

**RE: Tonto National Forest Motorized Travel Management Draft Supplemental EIS**

On one hand Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on the Tonto National Forest (TNF) Motorized Travel Management Draft Supplemental Environmental Impact Statement (DSEIS). However, on the other, how the Forest applies the National Environmental Policy Act (NEPA) planning process has become so complex the average person would not only be challenged to offer comments on what you're proposing but would be lost in the entire assessment. In the final analysis, we're not sure the average recreationist would be able to understand how the TNF would apply the directives on the land, other than by restrictions.

As required by NEPA, the Council on Environmental Quality (CEQ) regulations, FSM 1950.2 and FSH1909.15, 70 - Comments should be clear, concise, and on-point and relevant to the analysis of the proposed action. Therefore, we request the Forest ensure these same elements are apparent in the environmental statements written that will have significant affects across the entire Forest, so the public can be properly informed. Specifically:

- 1) Conduct and document environmental analyses and subsequent decisions appropriately;
- 2) Present for public comment a document that can be understood clearly by the millions of visitors, permittees, and other government agencies tasked to manage components across the same landscape;
- 3) Ensure Quality Assurance and Oversight Assessment (FSH1909.15, 70) is clearly applied in the environmental statement. Purposely ensure that NEPA documents are formatted clearly, well written, use plain language, and are easily understood by the intended audience. Further, you should ensure the analysis is easy to follow and leads to logical conclusions.

AZSFWC understands the TNF considers the Arizona Game and Fish Department (AZGFD) a cooperating agency; however we would suggest they should be a partnering agency in view of their trust responsibility in the conservation of all of Arizona's wildlife. This responsibility requires active management of wildlife to ensure those resources are conserved for present and future generations.

AZSFWC requests the Forest take NEPA's harder look at their travel management analyses and related decisions that would impact the AZGFD State mandates. This is a significant issue, as they are on the ground charged with enforcement, not just for wildlife regulations, but some of the very issues discussed in this EIS; Roads, Routes, Motorized Big Game Retrieval (MBGR) and Motorized Dispersed Camping.

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## **Consistency and Enforceability**

AZSFWC has been commenting on the various TNF planning matters dating back over five years. We have long called for clarity and consistency across Arizona's six National Forests, understanding there are differences across the varying landscapes, however some matters should be consistent for the recreating public.

One such example is the Fossil Creek Road #708. The February 2019 Reader's Guide for the Fossil Creek Draft Comprehensive River Management Plan (DCRMP) and Draft Environmental Impact Statement (DEIS) suggests in the Proposed Action Alternative E the portion of the #708 Road would reopen after repair work for vehicles less than 62 inches wide. AZSFWC would concur with the AZGFD recommendation to change that width to reflect the current industry standards for Utility Task Vehicles (AZGFD, 2019). However, the TNF DSEIS proposes to close #708 under alternative B and change it to administrative access only under alternative C, which is not consistent with the DCRMP. AZSFWC requests you consider and correct the Travel management analyses statements that contradict the DCRMP.

AZSFWC requests the TNF develop and offer a motor vehicle use map (MVUM) similar to what the Coconino National Forest publishes. This would go a long way in aiding the general public's understanding of what roads are proposed to be open and what roads would be closed. Your "story map" on line is helpful for someone sitting behind a computer, but in many instances impractical when one is in the Forest. We request you provide a similar map for public review prior to a decision, so the public can clearly see the proposed classification or designation of all routes.

## **Road Closures and Route Designations**

Attached is our October 1, 2017 letter to the TNF, addressed to the Tonto Plan Revision. Pages 3 and 4 go into great detail on our concerns relative to the importance of maintaining both the Cherry Creek Road #203 and the Workman Creek Road (Aztec Peak Road) #487 as open and accessible for the recreating public. The DSEIS did not provide a resolution that addressed these routes. AZSFWC requests the TNF leave both of these roads open pending a resolution of the wilderness boundary discrepancies and issues, including the consideration of an administrative action to correct the errors and inconsistencies that are documented in many federal records.

The DSEIS addressed the Powerline Road #393, however, disregarded the significant loss of access for the public to the east of Bartlett Lake. AZSFWC is concerned that the proposed section of .64 miles now being proposed for decommissioning is inconsistent with providing administrative use for AZGFD's management of two threatened fish populations, as well as power line maintenance needs. Here too, AZSFWC requests that this road remain open as an interim measure pending a resolution of the wilderness boundary.

## **Motorized Big Game Retrieval**

On February 7, 2019, the 9th Circuit Court of Appeals ruled MBGR be allowed "up to three miles from a designated route" for bison and "up to one mile from a designated route" for elk and mule deer on the Kaibab National Forest.

AZSFWC requests the TNF modify the DSEIS decision and allow the MBGR of elk, bear and mule deer up to one mile from a designated route. MBGR should be consistent across all the National Forests and Districts in Arizona, with respect to the 9<sup>th</sup> Circuit ruling.

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## **Motorized Dispersed Camping**

We are aware of the fact the TNF has worked with AZGFD on dispersed camping access specific to the Salt River while also protecting critical habitat for the Southwestern Willow Flycatcher. AZSFWC concurs with the AZGFD request relative to clarifying fishing access on the #465 Road and its spurs.

AZSFWC also concurs with the AZGFD recommendation that all previously disturbed motorized dispersed campsites and the #123 Road and spur roads that lead to the campsites remain open as inventoried and presented in alternative C of FEIS. Closing these roads and campsites has the potential to create additional disturbance and users would likely create new unauthorized roads and campsites to replace these excluded areas.

## **Summary**

AZSFWC appreciates the need to balance natural resource management with recreational use on the forest. However a key component missing in your analysis was any consideration of the economic impact of lost or limited recreational access, particularly where motorized vehicle access is long established on already classified travel routes. That is a critical issue as our state's population continues to grow and the need for more recreational access grows with it!

Thank you.



Jim Unmacht  
Executive Director

CC: Senator Krysten Sinema  
Senator Martha McSally  
Representative Paul Gosar, D.D.S.  
Representative Tom O'Halleran  
Director Ty Gray, AZGFD

*Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions.*

*AZSFWC consists of 41 member, affiliate, and associate groups that reach across the spectrum of hunting, angling, shooting, outdoor recreation and businesses from all across Arizona. Our member groups represent in excess of 10,000 sportsmen and women from Arizona.*

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