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November 18, 2019

*Delivered via email to [objections-southwestern-regional-office@fs.fed.us](mailto:objections-southwestern-regional-office@fs.fed.us)*

Mr. Calvin Joyner, Regional Forester  
USDA Forest Service, Southwestern Region  
1323 Club Drive  
Vallejo, CA 94592

**RE: Objections to Travel Management on Tonto National Forest Draft ROD**

Dear Mr. Joyner:

Please accept these objections to the Draft Record of Decision (“Draft ROD”) for Travel Management on the Tonto National Forest, as well as the associated Final Supplemental Environmental Impact Statement (“FSEIS”). The Responsible Official is Forest Supervisor Neil Bosworth. The applicable legal notice was published on October 4, 2019 in the Arizona Capitol Times, the newspaper of record for the Forest. These objections are submitted on behalf of Ron Tuchschiidt, who shall be the lead objector.

These objections are submitted in accordance with 36 C.F.R. part 218. Mr. Tuchschiidt filed comments raising the stated issues or otherwise providing a basis for these objections. The point of contact for this objector is the undersigned, and please direct all communication regarding these objections to Paul Turcke at 7699 West Riverside Drive; Boise, Idaho 83714; 208-331-1800; [pat@msbtlaw.com](mailto:pat@msbtlaw.com). We formally request a resolution meeting in accordance with 36 C.F.R. § 218.11. We hereby authorize, indeed encourage, the Reviewing Officer to extend the time for a written response to objections, particularly if it will facilitate a thorough effort to explore opportunities to resolve objections. See, 36 C.F.R. § 218.26(b).

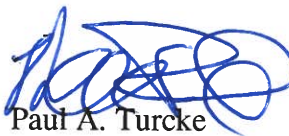
Mr. Tuchschiidt objects to the agency’s failure to consider designation of motorized routes, and particularly single track trail, in the area bounded by 144<sup>th</sup> Street on the west, Lone Mountain Road on the south, FR1190 on the east, and FR2123 on the north. This area contains various trails which have long been shared by motorcycle riders and horse riders with very light usage, minimal impacts, and few, if any, incidents of conflict or other concerns. Mr. Tuchschiidt additionally noted and objects to the fact that the agency authorized specially permitted

commercial use of this area, with the failure to designate here creating at least the perception of undue benefit to the permittee or enhancement of permittee operations.

The agency noted Mr. Tuchschtmidt's comment, but improperly brushed it aside along with other comments as "miscellaneous out of scope" comments. FSEIS, Appx. A at A-45. Specifically, the comment(s) was alleged to be "an opinion or position statement...or [ ] a statement that is not specific." *Id.* This characterization is inaccurate, and the agency is required to articulate some rational basis for failing to consider the requested designations.

We appreciate the opportunity to address these concerns in the objection process and urge you to utilize the objection process to restore these sustainable and appropriate trail uses on the Tonto National Forest.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul A. Turcke", with a stylized, cursive script.

Paul A. Turcke

/PAT