



August 17, 2022

USDA-Forest Service Southwest Region
Neil Bosworth, Tonto National Forest, Forest Supervisor,
Responsible Official
ATTN: Objection Reviewing Officer
Michiko Martin, Regional Forester, Southwest Region
333 Broadway Blvd SE
Albuquerque, NM 87102.

RE: Tonto National Forest (TNF) Plan Revision #51592 Objection on the Tonto National Forest Final Land Management Plan (LMP) and Record of Decision

Submitted electronically via CARA Online Portal:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=51592>

Thank you for the opportunity to provide our statement of issues. Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, youth orientated groups, outdoor recreation groups and businesses from across Arizona, representing more than 25,000 people.

Eligibility to Object, AZSFWC prior substantive formal comments:

With respect to the interests of sportsmen and women who participate in outdoor recreational activities, as well as the conservation of habitat, stream, and riparian areas on the TNF, the AZSFWC identified issues of concern submitted in our prior comments to the TNF draft LMP and associated analyses. We incorporate those comments here for background information of our concerns as the LMP was developed (Letters dated 3-12-2020, 2-12-2018, 1-11-2018, 11-6-2017, 10-1-2017, 5-21-2017, 1-11-2017, and 11-4-2016). These included concerns regarding the TNF's level of analysis and hard look as is required by the National Environmental Policy Act of 1969, P.L. 91-190 (NEPA) specifically for:

- ecological sustainability,
- social, cultural, and economic sustainability, and
- forest wide management.

AZSFWC submits the following objection statement of issues on the Final Tonto National Forest (TNF) Land Management Plan (LMP), Record of Decision (ROD) and related analyses.

AZSFWC Objection to Tonto NF Final LMP and ROD – 8-17-22

Arizona Sportsmen for Wildlife Conservation
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Issues that arose after the opportunities for formal comment (36 CFR 219.53(a)), § 219.54 (c)(7):

Due to recently significantly altered landscapes on the TNF from broadscale burning and wildfire use over thousands of acres, the resulting landscape scale loss of vegetation and soils from erosion and landslides, there is a greater concern for available and quality water and forage or browse for wildlife, as well as corridors and crossings in many areas.

- The LMP states the TNF ‘*ensure*’ certain actions or results occur or are not violated; thirty-nine times. However, the LMP does ***not*** ensure actions are taken to ensure available and quality water or forage for wildlife, as it ensures water quality for humans (p. 32), or sustainable livestock grazing (p. 41 and 42) or ensures that healthy sustainable plant populations are available for traditional uses (p. 49), or ensures sufficient flow is provided for protection of riparian and aquatic species [*but not terrestrial species*] (p. 110).

Therefore, we request the LMP also ensure available and quality water and forage for wildlife, maintained at a sustainable level, including developed water, within the plan components under *Wildlife, Fish and Plants*, (p. 116) *as follows* and/or other pertinent resource components in the LMP, determined by the appropriate NEPA analysis (providing emphasis on the critical value of wildlife and its habitat and needs, rather than simply mentioning the needs of wildlife by default through other actions).

Desired Conditions (WFP-DC)

09 Wildlife habitats are resilient to disturbances, fluctuations, and extremes in the natural environment (e.g., fire, flooding, drought, climate variability).

Guidelines (WFP-G)

09 Work with partners, Federal and State agencies, and local governments to develop protocols to address the restoration and sustainability of important wildlife forage and cover plants to ensure that healthy sustainable plant populations are available for wildlife use and habitat.

Management Approaches for Wildlife, Fish, and Plants (WFP-MA)

09 Work with partners, Federal and State agencies, and local governments to monitor forage and water quality and ensure forage and water quality and availability.

10 Encourage the development of water sources in uplands where possible to create available quality water when riparian areas or other natural waterways do not provide sufficient water.

- The LMP addresses infrastructure for most Management areas and LMP components. However, for the *Wildlife, Fish and Plants* component, infrastructure is only mentioned relative to wildlife mortality or to avoid negatively impacting wildlife movement and dispersal, but not the need to construct or define and maintain wildlife corridors or crossings (for human and wildlife safety). The dangers of wildlife-vehicle collisions has been witnessed across the TNF by many visitors and locals, particularly since the broadscale landscape burning across the forest and loss of established quality and available waters, forage, and habitat. Within Public Law 117-

58, Nov. 15, 2021, § 171. Wildlife crossings pilot program, 135 STAT. 499, Congress finds wildlife-vehicle collisions present a danger to human safety and wildlife survival – are a major threat to the survival of species, including birds, reptiles, mammals, and amphibians. Funding is provided for Federal land management agencies and not less than 60 percent of the amounts made available for grants each fiscal year are for projects located in rural areas.

<https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>

Therefore, we request the LMP include the following within the plan components under Wildlife, Fish and Plants, (p. 116) and/or other pertinent resource components in the LMP, determined by the appropriate NEPA analysis:

Guidelines (WFP-G)

Within the guideline below add crossings or corridors as follows:

- 07 New infrastructure or constructed features (e.g., fences, roads, recreation sites, facilities, drinkers, **crossings or corridors**, and culverts) should be designed and maintained to minimize negative impacts to the movement and dispersal of wildlife, fish, and rare plants. Infrastructure and constructed features already present that negatively impact movement and dispersal should be modified or removed when no longer in use in order to improve connectivity. Barriers may be used to protect native species or prevent movement of nonnative species.

Management Approaches for Wildlife, Fish, and Plants (WFP-MA)

- 11 Develop and use action plans to: (1) determine wildlife dispersal due to wildland fire or other landscape scale disturbances, (2) map and inventory primary wildlife migration corridors and (3) assess infrastructure alternatives for wildlife crossings where wildlife-vehicle collisions occur affecting human safety and wildlife survival.
- 12 Collaborate with State and Federal agencies, universities, non-profit organizations, and volunteers to research, inventory, monitor, map, and record data on wildlife corridor or crossing needs. Work to develop educational materials for the public.
- 13 Work with partners and researchers to identify where alternative approaches to wildlife crossing or corridor management will help meet forest desired conditions and objectives.

Specific to fire and fuels, the LMP analysis is based on and reiterated in the LMP that:

- The fire regimes described in Table 3 are what was used in the analysis, including patch size (p. 67, TNF Final LMP)
- “Most of the vegetation on the Tonto National Forest is adapted to recurrent wildland fires started by lightning from spring and summer thunderstorms.” (p. 103, TNF Final LMP).

Additionally, there is no known NEPA assessment for the LMP that evaluates the changed existing conditions from major federal actions that include wildland fires aggressively increased in size to a broadscale burn across thousands of acres, causing irreversible damage to vegetation adapted to spring or summer thunderstorm lightning

fires. Further, these changed existing conditions also caused irreversible damage to wildlife and their habitats as well as irreversible damage to watersheds.

Based on records of major federal actions

- that significantly affect the environment such as wildfire use or broadscale landscape burning (<https://gacc.nifc.gov> and <https://ftp.wildfire.gov> – National Interagency Fire Center (NIFC) and Geographic Area Coordination Center (GACC) incident specific data for the southwest, TNF) and also observations of the same,
 - the over 1 million acres of burned landscapes and irreversible damage of established wildlife habitat and significant alteration or losses of watershed structural components *beyond normal cyclical change* (e.g., Forest burn severity records as found in NIFC and GACC provided above, including Burned Area Emergency Response (BAER) assessments or summaries),
 - and from the impacts and aftermath of those burns on the TNF during recent years from wildland fires including intentional burning, being used as a tool to achieve natural resource benefits or for resource objectives, and including expanding human caused wildland fires, without the environmental review mandated under NEPA that would include the potential and now realized detrimental impacts across the TNF -
- 1) The TNF now has new conditions and information
 - a) that must be and has not been appropriately considered or analyzed
 - i) for the direction provided in LMP standards, guidelines, management approaches, objectives, and desired conditions such as where
 - (1) wildland fires have resulted in significant damage to soils and soil cover (causing erosion, landslides, and hydrophobic soils or similar impact),
 - (2) long term damage or permanent loss of vegetative cover for wildlife or fisheries habitat, watershed protection, and forage,
 - (3) long term damage or permanent loss to available surface waters and the landscape that preserves those waters' quality, availability, and safe recreational use (lakes, ponds, natural seeps, developed surface waters such as dirt tanks or springs, or similar sources) from damaged soils, soil cover, or plant communities, and
 - b) where specific Forest lands now need significant restoration or special long-term management for severely or extensively damaged
 - i) wildlife habitat, fisheries habitat, or rangelands,
 - ii) water developments and rangeland infrastructure important for management or protection of endemic, native, indigenous, or migrant wildlife or domestic animals.

Within these expansive fire damaged areas, there were thousands of acres of protected and managed wildlife habitat, wildlife improvements that wildlife and domestic animals depended on, such as long-established water developments and fisheries habitat that are now destroyed. There are now thousands of acres burned that were analyzed with different watershed, habitat, soil, and rangeland conditions for various ecological units, with a burn severity that changed the soil and plant communities.

This is an important substantive issue for the TNF LMP of changed conditions that significantly impact wildlife, soil, water, plant community, and riparian conditions that must be appropriately analyzed. This is in line with the purpose of the revised LMP. Further, this complies with the 1976 National Forest Management Act that requires the Forest to

maintain appropriate forest cover, provide for diversity of plant and animal communities, and maintain a natural resource conservation posture that will meet the requirements of our people in perpetuity.

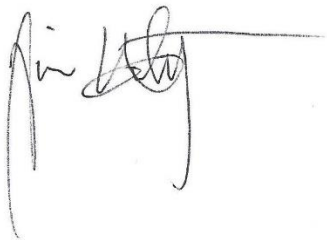
Recent broadscale wildland fires intentionally burned based on a wildland fire strategy with no known appropriate level of NEPA analysis, significantly changed the Forest landscape. In some areas of significant size on the TNF, these fires essentially rendered ineffective the years of planning efforts by the Four Forest Restoration Initiative (4FRI) planned activities that included land management tactics other than fire. Those planning efforts are incorporated in the LMP guidance.

We believe it is also beneficial to outline our support of several LMP final changes, to further emphasize the significant issues we describe in our objection that demonstrate a management breakdown away from pertinent edicts and the foundational continuity of the LMP analyses and resulting direction. We support replacing some of the 1985 goals for management and translating them to management approaches, desired conditions, guidelines, or standards and clarifying objectives. We recognize the importance of the following changes:

- The LMP includes emphasis on ecosystem maintenance, improvement, or restoration. The LMP directs there to be management approaches for revegetation, restoration, and rehabilitation to provide for the conservation of ecosystem diversity and maintain healthy ecosystem functions. Where issues may occur, LMP standards and guidelines direction is to minimize negative impacts such as remove or replace what is causing the issue of concern or implement maintenance, management changes, design element changes, and improve or restore ecosystems. This is particularly important where on-going impacts are unknown and need to be assessed.
- The LMP also emphasizes landscape scale restoration efforts and appropriate vegetation function and species composition. Improving and maintaining sufficient ground cover is a must for increased ecosystem resiliency to changing current and foreseeable environmental conditions and stressors. Terrestrial and aquatic habitat linkages and connectivity for species migration and movement across the landscape, as well as conservation and recovery of federally recognized species, and maintaining viable populations of species of conservation concern are underscored.
- As compared to the TNF Travel Management Plan, Forest management in the LMP also includes the protection of existing public access and evaluating the acquisition of new public access opportunities.
- The Recommended Wilderness Management Area (RWMA) boundaries were set away from the established motorized or mechanized access routes. In some cases, there are open motorized routes that are cherry stemmed into or through an RWMA.
- Hunting, Fishing, and watchable wildlife are identified as key ecosystem services on the TNF, and the LMP has plan components in place to support these services for the future.

AZSFWC Objection to Tonto NF Final LMP and ROD – 8-17-22

AZSFWC is committed to conserving, restoring, and protecting the unique fish, wildlife, and habitat values of the TNF. We appreciate the opportunity to participate in the review and comment opportunities for the LMP and would like to work cooperatively with the TNF staff to address the issues and concerns outlined above.

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director

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