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Comments: REVISED DEIS COMMENTS

The public outreach for comments on the Revised DEIS is insufficient. The Forest has historically been much more aggressive on informing the public of short duration upcoming projects or actions than they have been on soliciting comments on the Revised DEIS. Implementation of the preferred alternative will fundamentally change the public's allowed use of the national forest for the foreseeable future. I offer the following example. The forest on an as needed basis has historically implemented short duration area closures during the peak of high fire danger. These written notices are placed at retail business's, post offices, and informational bulletin boards at campgrounds. The closures are generally covered by the tv media in the Phoenix metro area. After the public meeting in Show Low I perused the mentioned physical locations on the Black Mesa District and found nothing about the Revised DEIS. NVUM data shows that a large percentage of the A/S recreational use is from the major metropolitan areas of the state. What was done to notify these folks? Announcing two additional public meetings 11 days before the closure of the comment period with the actual meetings held 5 and 6 days before comment closure is too little too late for the public to review the hundreds of pages of information associated with the Revised DEIS. The comment period needs to be extended and an outreach effort for public involvement be implemented that at least mirrors what has been done historically on short term forest closures. If you really want "to gild the lily" make an outreach effort that genuinely exceeds what has been done historically.

The road miles that will be affected by the alternatives are grossly underrepresented by the use of semantics and the forest service's selective use of data that they have on the road system. R3 SUPPLEMENT 7731.02 effective date of 09/06/1996 required "The identification of every existing road (and trail) constructed for, or created by, human use:" While this direction has been removed it was in the FS manual system for a very long time and a great deal of data was collected. To not acknowledge and quantify the number of road miles that will actually be closed to public use is duplicitous and fails to follow the wisdom of Jack Ward Thomas. A comparative look at Google Earth and your current alternative 1 DEIS map illustrates the disparity between what is really on the ground versus what the FS claims. Your current take on how a road is classified (level) as to whether or not it is included in the mileage closed makes for a politically more palatable road closed number but does not reflect reality on the ground. It reminds me of the "king has no clothes" fable of my youth. The Forest Service extensively uses Avenza Maps to display MVUM data on other region 3 forests, project fire maps etc.. The alternatives should be available in that or a comparable format that allows an individual to verify their physical location on the ground in relationship to roads open or closed by the various alternatives offered in the DEIS. Revisit the miles closed figures in the alternatives and include the roads that are currently in use regardless of the current administrative classification.

For a National Forest that has hosted the Rodeo-Chediski and Wallow fires I am incredulous that a plan to radically modify the road system has no analyses of how that might affect the fire suppression effort and resulting damages from the incident. In commercial timber stands roads that aren't used accumulate a layer of organics that will carry fire, eventually trees populate the road and the road ceases to exist. Roads that are used do not accumulate that layer and are in essence a narrow fireline. Depending on the fire behavior the road may or may not impede the fire's progress. Alternative 2 and 3 would essentially ban the public use of the skid and haul roads developed by the Forest Service. The Revised DEIS does not acknowledge that any of these roads are currently open and in use as other than user created routes. These roads frequently provide ready access to fires without the need for dozers to "open the road". When fire behavior moderates these same roads impede the growth of the fire. The Forest has a designated WUI map. Analysis on response times for ground units and ultimate fire size should be conducted for lands contained in the WUI area; "gaming" the elimination of the current on the ground open roads. The same exercise should be done with open roads available after implementation of the

various alternatives. As these closed roads vanish over time the emergency vehicle / administrative exemption becomes moot and travel time for ground forces will increase.

I inquired at the Show Low public meeting on how your dispersed recreation site data was collected. I was told that AZGF provided input along with ranger district personnel but no specific protocol was known. AZGF does fine work but given the size of their workforce in comparison to physical acreage of the A/S how did they develop their data? I find lots of data on how many miles of camping corridors are provided under the alternatives but have been unable to find any metrics on historic use or anticipated future use. Please quantify the historic use, and explain how the data was developed. The various alternatives should specifically address whether they can or cannot meet the historic dispersed recreation demand.

The DEIS commentary on noxious weed spread by motorized vehicles seems to be lacking a sense of scale. I agree that noxious weeds can be spread by motorized vehicles. I believe the number of motorized vehicles that engage in travel thru a weed patch on the Forest is an infinitesimal percentage of the number of grazing or browsing animals be they domestic, feral, or wild that travel a weed patch. I would like to volunteer if the FS does a field survey to figure out the culprits moving the weed seed. I suggest fencing the infected areas off with fencing such as used on the aspen enclosures on the Sitgreaves. This action would take care of most suspects except wind and water. Speaking of wind it is currently fairly steady 12 to 18 with gusts to 28mph it was much higher this afternoon.

In reading the Cultural Resources Specialist Report (M. Schroeder) I see that she reviewed 2,107 site records out of 5229 that could possibly be affected. Table 3 pages 10 and 11 along with the associated verbiage contains her conclusions on damaged sites

ACTIVITYSITES AFFECTED

SYSTEM ROADS626

CAMPING 33

OHV USE 3

ACTIVITYSITES AFFECTED

BIG GAME RETREIVAL0

LOGGING155

Schroeder states 626 sites have been impacted by road CONSTRUCTION. Her corresponding chart shows this as "SYSTEM ROADS". The Forest Service damaged these sites not the public in their OHV or their motor home. Schroeder attributes 33 sites in her writing but 44 sites in her chart as damaged by recreational activities. I tally 171 sites damaged by logging or thinning activities. So let us compare the damage.

FOREST SERVICEPUBLIC

ROAD CONSTRUCTION626CAMPING33

LOGGING/THINNING155OHV USE3

TOTAL78136

What I get out of this data is that for every 1 site the public historically damaged thru camping or OHV use the

Forest Service has damaged 21 plus sites. The DEIS analyses on cultural resources is replete with the use of the word "potential" and the many terrible things that could "potentially" befall cultural resources. Revisit your analyses and quantify these catastrophic effects using the historic data that has been documented in your specialist report. Trump potentially could bomb North Korea