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First name: Laurie

Last name: Coleman

Organization:

Title:

Comments: The National Forest system was created by the Forest Reserve Act in 1891 with the goal of protecting watersheds and preserving the nation's timber supply. In 1897 the Organic Act while recognizing that activities such as hunting and camping would be allowed on the national forest, also set up criteria for protection of the forest, watershed and timber production. In 2005 the Travel Management Rule was established with the stated goal of identifying a transportation system that is environmentally and financially sustainable while meeting public needs.

The 'Preferred Alternative' or Alternative 2 being proposed for the Apache-Sitgreaves National Forest does not significantly reduce the number of roads: failing to meet the fundamental goal of watershed protection, and is neither environmentally or financially sustainable.

The US Forest Service itself has identified a significant financial impediment to expanding the current official network of roads on its website (<https://www.fs.fed.us/science-technology/travel-management>):

"The Forest Service road system consists of over 371,000 miles of road, which connect America's National Forests to the nation and enables private investment and opportunities for thousands of Americans. Funding for maintenance of these roads has declined over the last 20 years while public demand for these roads has escalated, causing the aging network to deteriorate. "

Futhermore, District Ranger Alissa Tanner has indicated at a TMP meeting in Alpine that the FS doesn't have the funds for road maintenance or enforcement of laws necessary for the implementation of Alternative 2. The 'Preferred Alternative' is out of compliance with the stated goals of the Forest Reserve Act, the Organic Act and the Travel Management Rule.

The Forest Service's Watershed Condition Framework has identified a majority of the watersheds in the Apache National Forest as either Functioning at Risk or Impaired Function. The Little Colorado River, Nutrioso Creek and Water Canyon are listed as part of the State of Arizona's Little Colorado River TMDL plan that is currently being, or in the past have been managed for turbidity. Most of the Apache National Forest has increased erosion as a result of the 2011 Wallow Fire. Failing to recognize all of this evidence, Alternative 2 with it's numerous drainage crossings, unnecessary ATV trails and off road exception for big game retrieval is out of compliance with the stated goals of the Forest Reserve Act, the Organic Act and the Travel Management Rule itself.