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First name: Richard

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Organization: Greenlee County Board of Supervisors

Title: Chairman

Comments: Dear Steve & Tim;

Greenlee County is located on the eastern border of Arizona and has approximately 10,000 residents. Greenlee County is also limited to approximately 6% of its land mass being privately owned with the majority of the county consisting of federal land. In the areas of Greenlee County north of the Clifton/Morenci communities, the land is almost exclusively managed by the U.S. Forest Service. County residents have used these FS lands since before Arizona Statehood for grazing, timber, recreation and other activities. Greenlee County has also long been an active participant and recognized leader in a wide variety of planning activities with the Forest Service and other interested parties.

All the FS managed land within Greenlee County falls within the Apache-Sitgreaves National Forests (A-S), and as such Greenlee County has a vested interest in the proposed Apache-Sitgreaves National Forests Public Motorized Travel Management Plan.

A review of the proposed TMR and in meetings with FS personnel, it appears that much of the impetus for changing the rule is for administrative convenience rather than to address specific concerns that the current rule has created. As such, the A-S should propose and implement an alternative that is the LEAST restrictive means necessary to comply with the federal rule while at the same time providing for

MAXIMIZED forest access for grazing, recreation, fire suppression and management, and other current multiple use purposes. The preferred alternative does not accomplish this objective. Specific areas of concern to Greenlee County include the following:

1. While there are certainly some roads which have not been maintained for a long time, and some which may have specific negative impacts on environmentally sensitive areas, such site-specific issues would be more appropriately addressed individually rather than by a sweeping new rule that will unnecessarily change the character of forest utilization. Greenlee asks that the final rule take a different approach than that in the proposed rule; one which retains adequate motorized road travel in the Apache-Sitgreaves National Forests, and which addresses site specific concerns rather than administrative convenience.

2. Motorized dispersed camping should be included in the final rule. Such camping should be consistent with the reasonable enjoyment of safety, privacy, comfort, custom and culture, allowing the parking of motorized vehicles and/or trailers at a distance of 300 feet from the closest legally open road or trail, including access to dispersed camping sites previously used and established in the local custom and culture as demonstrated by tangible evidences of previous use such as fire pits, improvements, etc. The proposed rule is too restrictive with respect to dispersed camping and may cause the unintended consequence of causing an inordinate amount of environmental damage within 300 feet of roads and trails because of concentrated use of limited camping areas. The proposed preferred alternative fails to adequately articulate damage that will be caused by allowing camping activities to be further dispersed from roads and trails.

3. The proposed alternative is too restrictive with respect to game retrieval. The rule presupposes that all game other than elk can be retrieved without the aid of motorized transport. However, other game species, such as black bear and large mule deer, can be as large as many of the elk harvested on the forest lands. Retention of motorized big game retrieval for all species of game meeting the definition of 'big game' in the Arizona Game and Fish Department hunting regulations, allowing one trip each way from the downed animal to the closest legally open road or trail, regardless of distance, by the most direct route compatible with safety and the preservation of

other values such as riparian areas, archeological sites, etc. Additionally, hunters with disabilities or who are young or aged will be unnecessarily restricted or prohibited from hunting on the national forest because they will not be able to retrieve the animals they take.

4. Greenlee County asks that the final rule retain motorized dispersed collection of firewood in the authorized firewood collection area, compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc. The proposed rule does not address the need for and benefits of wide spread fire wood gathering. As noted in the proposed rule, the most devastating event in the history of the A-S was the Wallow Fire. At least one significant contributing factor in the severity and impact of that fire, was a forest landscape that was littered with downed trees and forest debris. Allowing dispersed motorized aided fire wood gathering could be a significant component of addressing this particular concern.

5. While Greenlee County recognizes the need for appropriate restrictions on indiscriminate cross[shy] country travel in order to preserve and conserve the resources contained in the Apache[shy] Sitgreaves National Forests for the enjoyment of future generations, such restrictions should be analyzed and implemented on a site-specific basis as suggested in item number 1 above.

6. The final rule must retain the possibility for future adaptations of the rule to provide for additional motorized access to recreation areas, trails and other appropriate multiple use activities over at least 75% of the Apache-Sitgreaves National Forests.

7. Established industry will be unnecessarily negatively affected by the preferred alternative. Ranchers use of motorized transportation to check and repair fence lines and water sources which benefit endangered species by helping keep grazing activities out of riparian areas and disperse the impacts of both livestock and wild game on such areas. Additionally, ranchers are not able to rescue livestock that are downed for a variety of reasons including but not necessarily limited to calving, illness, wild animal attack and so forth. Without the ability to get to and assist these animals, ranchers will suffer even more economic loss than the harsh conditions their operations already face.

8. Greenlee County, along with numerous partners in both the environmental community, other government organizations, the Forest Service, and others, have worked for years to establish a viable industry based on the use biomass materials that have commercial value and which at present, presents unnatural and unnecessary forest health problems including spread of disease and increased fire hazard. The objectives of this project, known as 4-FRI, will be negatively affected if contractors are unable to effectively work the designated treatment areas. As such, the preferred alternative presents an increased risk to forest health which 4-FRI is specifically designed to address. As such its net effect in the treatment areas and possible future treatment areas may have an overall detrimental effect on the environment and threatened and endangered species. No one can credibly argue that the Wallow Fire left the landscape better off. Any final rule should specifically provide for the continuation of the 4-FRI initiative and any other similar projects designed to address forest health and viability with private investment.

In addition to these comments and concerns, Greenlee County hereby specifically adopts as its own, the comments prepared by the Arizona Eastern County's Organization.

In conclusion, Greenlee County believes that the proposed preferred alternative unnecessarily focuses on administrative convenience at the expense of multiple use of the forest. It further threatens to increase threats to forest health and viability in the name of preservation and protection and arbitrarily and unnecessarily limits the public's use of public lands.

Greenlee County is supportive of rules, including a reasonable TMR which protects the A-S asset we all enjoy. However, the proposed TMR goes too far in that it will jeopardize legitimate, legal and safe uses of the forest for

both recreation and industry. Greenlee County therefore asks the Forest Service to not implement its preferred alternative in favor of the No Action alternative or to return to the drawing board and consider a less administratively burdened approach to travel management.