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First name: Mike

Last name: Curiak

Organization:

Title:

Comments: Comments on Tonto NF Draft EIS

Dear Draft EIS Kenna Belsky and Beth Rumpza,

I come to Arizona in the winter, pretty much only to paddle whatever whitewater is running.

Please revise the Draft Plan to better prioritize healthy watersheds and the river recreation opportunities that they provide.

Please expand the Wild and Scenic River eligibility findings to acknowledge all rivers and creeks that are free-flowing and have Outstandingly Remarkable Values.

Please consider more protective management direction for sensitive ephemeral and intermittent streams.

In order to provide these rivers the protections they deserve, I am asking you to:

- Provide more robust justification and data in the Wild and Scenic Eligibility study; key information is missing and I want to understand why rivers were deemed ineligible and which ORVs were considered
- Use multiple geographical scales when comparing ORVs to the region of comparison and consider the national importance of these values; many of the Tonto's rivers are unique to Arizona and are not found outside the state, making them very nationally unique
- Maintain eligibility determinations for the Lower Salt River, Upper Salt River, Lower and Upper Tonto Creek, Salome Creek, and the Verde River.
- Acknowledge paddling as a primary contributor to ORVs on the Lower and Upper Tonto and on Salome Creek.
- Expand the list of eligible Wild and Scenic Rivers. Numerous additional rivers are free-flowing and possess Outstandingly -Remarkable Values and should be determined eligible, including the East Verde River, Christopher Creek, Ellison Creek, and Sycamore Creek.
- Employ stronger protections for ephemeral and intermittent streams throughout the Draft Plan. The definition of streams and stream ecosystems should explicitly include ephemeral and intermittent streams and these stream types should be referenced and prioritized in management direction components.
- Revise the Wilderness Evaluation to include more wilderness quality lands; only 10% of worthy land area has been recommended as Wilderness. Without Wilderness protections, we will risk losing sensitive and remote areas to motorized recreation, unsustainable grazing, and hard rock mining.

These revisions will only make the Tonto NF Draft Plan stronger, providing the Tonto's rivers and surrounding landscapes with the protections they deserve.

Sincerely,

Mike Curiak

Grand Junction, CO 81507

mike.curiak@gmail.com