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First name: Richard

Last name: Bohman

Organization: Central Arizona Grotto

Title: Conservation Chair

Comments: To the Tonto NF Planning Personnel and other interested parties,

My name is Rich Bohman, and I serve as the Conservation chair for the Central Arizona Grotto, which has been working to protect and help manage caves in the Tonto NF since 1960. Thank you for the opportunity to comment on the draft Tonto Forest plan and DEIS. In general, the draft forest plan and DEIS have excellent protections for Tonto NF cave and karst resources. With that in mind, we would propose the following minor changes:

In the Tonto National Forest Draft Land Management Plan, dated November 2019:

SU Description

In the first paragraph, we would suggest that caving be added to the list of activities, for example:

"Outfitting and guiding authorizations can be issued for a variety of activities including, but not limited to, hiking, backpacking, horseback riding and packing, off-highway vehicle use, motorized and non-motorized boating, tubing, mountain biking, canyoneering, caving, bird watching, fishing, hunting, and educational wilderness experiences."

CVK-DC-01

The desired conditions of the cave does not refer at all to the recreational value associated with caves. Per the FCRPA, one of the seven criteria for designating a cave as significant is "recreational". Maintenance of the recreational value of caves and access to caves as a recreational resource should be explicitly described in this plan.

CVK-G-02

The verbiage in this guideline is good, but we encourage all new gates to have a failsafe built into their design whereby a person trapped inside the cave would open the gate from the inside without having the key (key lost in cave, party injury, broken lock mechanism). Examples of cave gates with these types of mechanisms exist in the Apache-Sitgreaves and Coronado National Forests. Recommended text: "Where possible, new gate designs should allow the gate to be opened from inside the cave without the key."

GRZ-G-02

Salt and mineral supplements should also be excluded from sinkhole and karst infeasible areas. Ground disturbance causes surface turbidity in the water flowing onto the karst and causes them to plug shut. The water then stays on the surface and evaporates instead of recharging into the aquifer.

SCMA Description

The first sentence of the description's reference to "The National Caves Resources Management and Protection Act (P.L. 110-691) " is to a law in the Philippines. This error was first introduced in a New Mexico Forest plan and has propagated here. The appropriate citation is the "Federal Cave Resources Protection Act (FCRPA) of 1988 (16 U.S.C. 4301-4309; 102 Stat. 4546)".

In the Draft Environmental Impact Statement for the Draft Land Management Plan, Volume 2:

Table 102 [page 20]

There is no mention of bats in the list of species at risk due to poor watershed and riparian conditions. These corridors are crucial for bats, and at least some of the bat species local to TNF should be added to this list.

Table 103 (continued) [page 22]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Table 110 [page 31]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "avoid thinning and disturbing areas around all cave entrances. Undisturbed areas should be up to 300 feet depending on terrain."

Table 117 [page 37]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "avoid logging, thinning and disturbing areas around all cave entrances. Undisturbed areas should be up to 300 feet depending on terrain."

Table 130 (continued) [page 54]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Table 137 (continued) [page 62]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "avoid mining and disturbing areas around all cave entrances. Undisturbed areas should be up to 300 feet depending on terrain. This includes pioneering roads, road drainages, spoils areas and access routes."

Table 144 (continued) [page 68]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "Livestock should be limited in areas up-drainage from caves and karst features to reduce ground disturbance. Ground disturbance leads to increased sedimentation entering the caves/karst affecting the ecosystem. Surface water is limited to entering the aquifer. Salt/nutrient stations should be prohibited up-drainage from cave/karst areas."

Table 151 [page 75]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "avoid disturbing areas around all cave entrances."

Undisturbed areas should be up to 300 feet depending on terrain. Up-drainage to cave entrances and sinks are particularly important to remain undisturbed."

Table 158 [page 83]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

Type of Area: Significant Caves | Effects:

Suggest changing "(No significant effects expected)" to "avoid using pesticides around all cave entrances. Avoid pollutants around caves and sinks. Undisturbed areas should be up to 300 feet depending on terrain. Up-drainage to cave entrances and sinks are particularly important to remain undisturbed."

Table 165 (continued) [page 92]

Type of Area: Significant Caves | Name(s):

There are currently 17 significant caves in Tonto NF, not 9 as listed in the table. Recommended text:

"9 17 significant caves (see draft forest plan for more info)"

If you have any questions about these comments, please do not hesitate to contact me. Thank you for your consideration,

Rich Bohman
Conservation Chair
Central Arizona Grotto
NSS 50283

Also Signed:

Brooke Kubby

Ray Keeler

Marlene Sweeney

Chris Lieb

Jeff Watkins

Sarah Truebe

Cameron Kopas

Paul R. Jorgenson