Data Submitted (UTC 11): 3/12/2020 9:14:51 PM
First name: Charles
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Organization:
Title:
Comments: Tonto National Forest Draft Land Management Plan
Attn: Forest Planner
2324 E McDowell Rd
Phoenix, AZ 85006
Dear Forest Planner,

Thank you for the opportunity to submit comments for consideration in the Tonto National Forest (TNF) Draft Land Management Plan (Plan) and DEIS.

I appreciate the focus of adaptive planning and monitoring as provided in the Plan. Also, I appreciate you recognizing there is always uncertainty about the future of natural systems and associated disturbances and the likelihood of change in social conditions and human values specific to Forest management, which requires an effective monitoring program, is important to appropriately respond to detected changes.

With the multiple use mandates, while providing direction and thresholds, it is important to continue designated grazing through allotment management plans that are prepared consistent with the Plan. This is critical as livestock grazing operations contribute to the long-term socioeconomic diversity and stability of local communities and the State.

However, within the Forestwide Plan Direction and Management Areas Plan Direction there are statements made that lead to overly prescriptive and arbitrary standards that are inconsistent with the Plans assertion of adaptive management. As you refine this Plan, I recommend you ensure the standards are not contradictory to the leading concept for the Plan to provide adaptive flexibility and meet multiple use mandates.

How binding a standard will be, is determined by the use of terms that convey mandatory, required, or optional compliance. On page 40, Guidelines (GRZ-G), at 04, is states, Livestock rotations should avoid grazing the same areas during the growing season at the same time, year after year. This statement must be removed. It is contradictory to long-established successful management that is unique to many southwest rangelands, including the Tonto National Forest, that implement adaptive management. Further, there are forage plants naturally resilient following grazing (grazing resistant), as well as forage plants that benefit from managed grazing. There are plants that benefit with stimulated growth, increasing vigor and density following grazing.

Further, because cattle (including our localized elk, deer, and pronghorn) are ruminant species who typically graze only about 8 hours in a day and ruminate or rest the other part of the day, and who have no upper incisors thereby leaving residual plant material across the landscape when they graze, this statement at 04. becomes an arbitrary contradiction to established rangeland research where grazing animals are "managed." Permitted cattle, as well as our State game animals who also can 'graze' following seasonal growth year after year in the same areas, are all managed under already defined edicts and long-established authorized practices. Therefore, to make a statement to avoid grazing the same area during the same growing season, year after year, is not consistent with many proven data sets from the Forests own records as well as Arizona Game and Fish Department monitoring records of grazing use, which the Forest has access to. This statement at 04. may sound good to those lacking plant phenology knowledge, with limited knowledge of authorized and analyzed managed permitted livestock grazing or monitored grazing of wildlife, but it must be removed for the reasons provided above and data found in numerous Forest and State records.

The recommended Research Natural Areas (RNA) standards state that livestock grazing will not be authorized. I recommend you take a closer look at these land areas considered, including whether the management and information desired for a particular area under consideration would best guide management of the Forest. The Forest has been administered for over a century without these new RNA land designations, and because the primary purpose for an RNA is non-manipulative research, observation and study, there are other areas on the Forest already designated to provide this type of research. Further, I can only surmise by your considerations for new RNAs, the parallel management by our State game and fish department was not considered. Creating additional restrictions on public lands must be carefully thought out and analyzed, particularly with a record of

management on that landscape covering over a century of data and observations by the Forest, local universities, and our State. I recommend you do not make recommendations that create further landscape scale restrictions or designations where those restrictions would not benefit or meet the full intent of National Forest System land management mandates.

The proposed action states there is a need for management approaches to address current and foreseeable stressors in Desert ecosystems and to better understand post-disturbance recovery of desert species. This includes the need to develop standards and guidelines that promote the maintenance, restoration, and monitoring of soil condition and function (e.g., hydrology, stability, and nutrient cycling) by improving and maintaining sufficient ground cover. I support your efforts to develop thresholds to assist in management of all Forest ecosystems.

However, I recommend you more closely evaluate what actually impacts or effects Desert Ecosystems that a Forest Service agency can manage or control. Consider the fact that intentional fires or those fires purposefully ignited into 'large' fires such as the recent Woodbury and Juniper fires, to name a few, whose fire starts (small man caused fire outside of the wilderness that could have easily been put out, and lightning in a wet very rocky area with a size of only 3 acres reported between May 17 to 20th [4 days] where the fire was barely moving would not have naturally burned the thousands of acres that were intentionally burned) cause greater damage and change the ecosystems on this Forest than any of the managed and authorized uses, including unauthorized off-road vehicle uses. This damage is substantial in the Desert ecosystems that occurred in the Woodbury fire area. I recommend you include special monitoring and rehabilitation for the area of the Woodbury fire and Juniper Fire and analyze other large fires with similar 'management', just as you consider other special management areas including standards and guidelines. Additionally, where it is known that "large' fires were intentionally burned to the large size, these areas should be automatically placed in a special management or monitoring area status so Fire program budgets will be used to determine the damage to resources and infrastructure their actions caused, and replace or rehab what was intentionally damaged.

You create arbitrary and ineffective Forest standards when restricting uses and restricting adaptive management of Desert ecosystems, based on prohibiting or limiting analysis of or ignoring long-term records and management, including site-specific data across the thousands of acres on the Forest that include a variety of ecotypes within the broader definition of Desert ecosystems. There is significant research on desert ecosystems, providing varying hypothesis and opinions or recommendations. There is also monitoring and trend information on these landscapes that does not appear to have been considered when developing the standards and guidelines.

There are many influences of Desert ecosystems on the Tonto National Forest. Considering its location relative to urban and metropolitan areas, invasive plant spread is evident and influences the landscape (one method of control is using managed cattle grazing). The influence of nearby urban areas also brings recreational uses that influence Desert ecosystems. Other activities include authorized mining, Salt River water users authorized draws from the watersheds, permitted livestock grazing, designated areas for off-road uses, and more. The Forests' established management that has been successful in meeting Forest goals and objectives and legal mandates over many years for all of these uses, is documented in the Forests own annual reporting requirements. Any unnecessary restrictions influenced by suggestions that do not consider prior successful management of livestock grazing when creating new Forest standards is therefore arbitrary and by that act negates the past century of Forest management successes and collaborative efforts. I recommend you take a harder look at the intent and purpose and whether there is a need for new Forest standards that are not fully analyzed for applicability to this Forest, in particular applicable to the individual ecotypes under the Desert ecosystem classification, and compare the best scientific information and analysis already analyzed and documented over the past century.

How ecological conditions are measured makes a difference. Ensure Forest standards are based on knowledge of the Forests management and outcomes that are well established over many decades, rather than a concept from a select set of opinions or hypothesis or other Forests Plans that are in different ecosystems and are not site-specific for this Forest. Forest standards must provide direction, guidance and flexibility that allows for sufficient analysis and outcomes at the individual project level.

The Tonto National Forest already has 8 designated Wilderness areas totaling 589,300 acres. I recommend

you complete further analysis to determine the need to include the recommended wilderness areas, thus further restricting public land multiple uses across those landscapes. This includes considering the negative impact any new recommended wilderness areas will have on the legal obligations of our Arizona Game and Fish Department and the many volunteer organizations that provide millions of dollars to habitat improvement and restoration projects across the Forest, including those areas selected as "recommended" wilderness.

Page 9 of the Forest Plan states the Plan should incorporate management approaches that prioritize native plant material development for revegetation, restoration, and rehabilitation to provide for the "conservation of ecosystem diversity and maintain healthy ecosystem functions". Further, it states the Plan should "emphasize landscape scale restoration efforts across the forest, and promote a diversity of seral states where appropriate, vegetation function, and species composition". However, within the Plan, Wildlife, Fish, and Plants (WFP) section on page 114, the Plan states the Mazatzal Mountains and Sierra Ancha Mountains have some of the highest concentration of endemic plant species in the State of Arizona. Your DEIS does not provide sufficient information to support this statement and if this status has been verified post the large fires that have occurred on these mountain ranges in recent years. Within Chapter 3 of the DEIS, Plants Affected Environment, there is discussion that lends itself to a less spectacular situation or condition for endemic species for the Sierra Ancha Mountains showing 50% of the streams assessed in the cottonwood riparian ecological response unit rated as impaired, with another 33 percent rated as unstable. Further current conditions show a substantial loss in surface roots indicating a potential loss in streambank stability. We were unable to locate discussion in the DEIS to verify the status of uplands following recent large fires. This lack of updated conditions across the Forest hinders full review of standards and guidelines for Forest Management.

Interestingly, in the Fire and Fuels (FF) section on page 101 of the Plan, there is a reference and link to the Vegetation and Ecological Response Units (ERU) section where additional Plan direction is offered. However, the Desired Conditions, Standards, and Guidelines in both sections and the associated DEIS do not provide direction or foundational information to address how the Forest will manage outcomes and needs for rehabilitation following large fires that cause damage to resources, roads, and infrastructure, particularly fires that were intentionally burned and increased significantly in size on purpose and not naturally (based on the Forests records would not have become large otherwise. Fire Situation reports, and SWCC RO records). We recommend the Wildlife, Fish, and Plants section, the Fire and Fuels section, and the Vegetation and Ecological Response Units section, include standards and guidelines that address the needs for rehabilitation. The Plan does provide direction on rehabilitation for disbursed recreation areas, trails, roads, designated wilderness areas unauthorized structures be dismantled and area rehabilitated, areas impacted by human activity in wilderness (this clearly does not include intentional large fire damage), and scenic areas, but there is no direction, standard, or guideline to address the management of landscape scale damage from areas burned due to intentional large fires, nor monitoring of the areas. This is important to include in the Plan so there is accountability by Forest administrators and to meet the intent of the management and direction throughout the entire Plan.

Thank you for the opportunity to comment.

Sincerely,

Charles Erickson
(contact information provided in form fields of comment system)