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First name: Kim

Last name: McClure

Organization: Sierra Club

Title: Ms.

Comments:

The Plan Revision for the Coconino National Forest #32780 should have strong standards and guidelines in order to protect and restore healthy forest ecosystems.

There should be management indicator species (MIS) selected that can indicate the health of all vegetation types, including riparian, aquatic, desert, interior chaparral, pinyon-juniper, spruce-fir, and alpine tundra. The Draft Plan only includes three MIS, which will be used to monitor ponderosa pine, mixed conifer, Great Basin grasslands, and montane grasslands.

The plan should ensure the Coconino provides opportunities for solitude and quiet recreation away from human impacts. The Forest Service should elevate all 13 areas eligible for wilderness designation to Recommended Wilderness Areas (RWA). Doing so, as suggested in Alternative C of the Draft Plan, would recommend that Congress add an additional 92,386 acres of wilderness to the existing 156,374 acres already protected on the Coconino. Areas that have wilderness character should be protected from future impacts.

Biological soil crusts anchor soils, protecting them from erosion, while contributing to plant health and nutrient cycling. They are extremely hard to restore once destroyed. The Draft Plan says that it's fine to impact a third of soil crusts. There is no scientific justification for allowing this level of destruction. The Forest Service must do more to protect soil crusts.

Protect wildlife habitats and recreation areas from the noise and lead pollution that accompanies recreational shooting. Alternative C closes the following important areas to recreational shooting: Research Natural Areas, Botanical and Geological Areas, Wildlife Habitat Management Areas, Walnut Canyon Management Area, Sedona Neighborwoods Management Area, Long Valley Management Area, and part of the Flagstaff Neighborwoods Management Area. We support closure of these areas.

A 2009 Congressional Mandate asked the Forest Service to collaborate on a study to examine options for protection of a 30,000-acre parcel surrounding Walnut Canyon National Monument. Many individuals contributed to this study and value this landscape. The Forest Service should enlarge its Walnut Canyon Management Area to cover the entire footprint of the Walnut Canyon Study Area and should consider it for a Special Designation.

Due to the limited water resources in our region, the Forest Plan should declare snowmaking to be an incompatible use on the Coconino National Forest.

Illegal trail-building and off-road-vehicle damage have been problems on the Coconino National Forest, damaging fragile soils and archaeological sites and creating conflicts among forest users. The Forest Plan should explain how the Forest Service will enforce road closures and penalize illegal trail builders to protect resources and other forest users.

Thank You,

Kim McClure