



SIERRA CLUB

RINCON GROUP



738 North 5th Avenue #214
Tucson, Arizona 85705

April 29, 2010

Coronado National Forest
ATTN: Plan Revision
Jennifer Ruyle
300 West Congress
Tucson, AZ 85701

Re: Coronado National Forest Plan Revision

Dear Ms. Ruyle,

First the Sierra Club Rincon Group, as a subset of the Sierra Club Grand Canyon Chapter, is in accord with the filing of the Coronado Planning Partnership on this issue. But as the Sierra Club entity most closely associated with the Coronado National Forest, we want to add our own statement to those you are receiving.

First, we need a modern planning rule to address the many current and future needs and challenges on the Coronado National Forest. We should not be developing a new plan using the Forest Planning Rule you are currently using – a planning rule that is almost three decades old. It is not sufficient for the land and wildlife management challenges of the modern era.

Because of the use of the outdated planning rule, and for whatever other reasons, the proposed Coronado National Forest Plan Revision now under consideration is fatally inadequate and should be scrapped in favor of a more comprehensive version that addresses the needs of the forest today and into the foreseeable future. Here are a few specific criticisms:

Special Management Areas (SMAs): The Coronado National Forest proposes limited additional acreage as SMAs, but these do not represent anything new with the exception of 105 acres that would be added to the Pole Bridge Canyon Research Natural Area. The other areas being proposed in the draft plan were all done (or thought to have been done) through the 1986 Forest Plan. What the inclusion of these areas in this draft plan represents is the CNF correcting an oversight, a quarter century late.

Because the forest service believed these areas were SMA's since 1986 and have managed them as such for more than two decades, only 105 acres would result in new or enhanced management under the new plan. When one examines this in the context of the unique diversity of wildlife and natural systems/communities on the Coronado National Forest, this is woefully inadequate.

Scientist and conservationists working with the Coronado Planning Partnership identified 11 areas and submitted detailed reports on each of them. The Coronado National Forest should give serious consideration to all of these.

Climate Change: One of the most startling things about the draft Forest Plan is a single brief mention of “potential change in climate.” There is no mention of strategies to deal with this potential change in climate; no mention or identification of non-climate stressors (which exacerbate the effects of climate change) to natural communities on the Coronado National Forest, nor is there any discussion of possible management actions that would eliminate or mitigate these stressors. This omission stands in stark contrast with the agency’s own federal directives to act quickly and comprehensively to reduce the impacts that climate change already are having on our forests and watersheds. Nationally, the Forest Service has worked hard to position itself as a leader in climate change research and problem-solving, authoring countless educational materials, trainings, strategy manifestos, and scientific papers on best practices for maintaining natural resource benefits in the face of rapid environmental change. Instead of responding to management needs of the modern era, this Coronado plan fails to address – much less meet – its own agency mandates.

Current and Proposed Management: The draft plan is insufficient for protecting the rich and unique biological diversity of the Coronado National Forest. There is also a failure to address impacts as they relate to the increased population (the region has added 300,000 people since the previous forest plan was completed in 1986) and subsequent increases in recreational pressure from those who regard National Forest lands as a human playground. There is a single brief mention of Redington Pass, the most impacted area of the forest in terms of uncontrolled, unmanaged recreation, with hordes of ATVs, wildcat dumping, and target shooting.

Quiet Recreation: Though the draft plan provides lip-service to the need for quiet recreation in numerous areas, ATV are only precluded from Wilderness Areas (as required by law) and are allowed in all other management zones on the Coronado. ATV’s should be excluded from all areas that have been identified as Wild Backcountry in the draft Forest Plan.

Potential Wilderness: There is a strong need for additional Wilderness on the Coronado National Forest and there is a strong need for all of the areas outlined in the 10 Potential Wilderness Area Evaluation Reports prepared by the Coronado staff, though these are woefully inadequate for current and future needs of wildlife, plants, and the public.

It is the duty of the Forest Service to provide objective evaluations for the public to assess and comment on. In reading the information contained within the Potential Wilderness Area Evaluation Reports, it is clear that the Coronado National Forest has a strong bias against Wilderness. You have created a document that in the event public response showed a need for more Wilderness Areas on this forest, ensures these areas would be as small as possible. This bias against any additional Wilderness has resulted in a number of contradictory statements, as well as flawed and arbitrary conclusions.

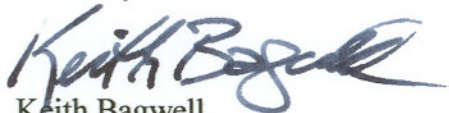
The Coronado National Forest’s efforts to identify those areas that meet the definition of the Wilderness Act of 1964 and that should be evaluated as Potential Wilderness have fallen woefully short. On the Coronado National Forest there exist many areas you ignore that are greater than 5,000 acres and are no different in character than areas that are currently Wilderness, or any different in character than these existing Wilderness Areas were at the time of their designation.

More than 200,000 additional acres exist in Roadless Areas on the Coronado National Forest that meet the above definition and that contained in Appendix A. These have been identified through different processes including RARE II, the National Forest Roadless Initiative, and by a Citizen's Inventory – the results of which have been provided to the Coronado National Forest.

In choosing to ignore these previously identified areas, you have failed to meet the most basic standard as outlined by your own process. By providing no explanation as to why these areas were not considered as Potential Wilderness, you have failed to meet the mandate of both President Obama and Forest Service Chief Tidwell for open government that is transparent, participatory and collaborative.

We have further problems with the proposal on the table, many of which the Coronado Planning Partnership, of which we are an active member, has expressed. Again, we sincerely believe this proposal is fatally inadequate to the forest's present and future needs and the Coronado Forest planners should go back to the drawing board and start over.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Bagwell", with a stylized, flowing script.

Keith Bagwell
Conservation Chair
Sierra Club Rincon Group