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Organization:

Title:

Comments: Forest Management Plan

Coronado National Forest

ATTN: Plan Revision

300 West Congress

Tucson, AZ 85701

April 30, 2010

Dear Ms. Ruyle,

According to the US Forest Service Region 3 (Arizona and New Mexico) website, "The Forest Service is beginning an open, collaborative process to create and implement a modern planning rule to address current and future needs of the 155 national forests and 20 grasslands in the National Forest System." With this statement the Regional Office is referencing the new Forest Planning Rule currently being developed to tackle the challenges we face today in land and wildlife management on our National Forest. This new Planning Rule is expected to be completed next year.

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.

Special Management Areas (SMA): The CNF is proposing 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/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 NF, this is not adequate.

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 NF, nor is there any discussion of management decisions/direction 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 is already having on our forests and watersheds. Nationally, the USFS 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.

This is particularly concerning given the previously documented susceptibility of our region to the likely impacts of global climate change.

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.

More mention is needed on the issue of the impact of UDA traffic along border areas given its multiple negative impacts on the environment. The negative impact of countless small mining activities also degrades the environment.

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.

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