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Comments: Please see the attached Travel Management Plan comments from the Arizona Wildlife Federation.

Thanks,

Scott Garlid

Conservation Director

Arizona Wildlife Federation

The Arizona Wildlife Federation (AWF) is the State[rsquo]s oldest wildlife conservation organization. The AWF is a 501(c) 3 non-profit conservation organization that was founded in 1923 to help take politics out of Arizona[rsquo]s game and fish management programs and to promote the management of Arizona's wildlife and natural resources based on the principles of "sound science". The AWF got its start as the "Arizona Game Protection Association" and will be celebrating 96 years of Arizona conservation advocacy and activity in 2019. AWF is an affiliate of the National Wildlife Federation (NWF) and coordinates closely with NWF on conservation issues of local and national importance that affect federal public lands.

Both the AWF and NWF have for many years been strongly promoting through their policy resolutions (AWF Resolution - "Travel Management on National Forests in Arizona" June 7, 2014; and NWF Resolution [ndash]"Management of Off Highway Vehicles (OHVs) on Public Lands" July 2, 2001) the critical need to designate and effectively manage roads and trails that are open for public use with motorized vehicles on federal public lands, and the need to effectively regulate and enforce where and when cross country motorized vehicle use by OHVs may or may not be permitted. These goals are of critical importance to both the AWF and NWF in light of the significant increase in public visitation and motorized recreational use of public lands and the explosion in sales, purchase, and use of OHVs by the public on federal public lands.

The AWF has reviewed the Revised Draft Environmental Impact Statement (RDEIS) Public Motorized Travel Management Plan [ndash] August 2019 for the Apache-Sitgreaves National Forests (ASNF). The AWF offers for consideration the following comments related to the key issues and concerns identified in the NEPA process and used by the ASNF to develop the Alternatives and the Proposed Action. They include: 1) Restricting Motorized Use for Dispersed Camping [ndash] Concern: "Adding roads and camping corridors to the transportation system will adversely impact terrestrial and aquatic wildlife species"; 2) Restricting Motorized Use for Big Game Retrieval [ndash]Concern: "Changing the motorized big game retrieval policy to a fixed distance corridor may result in hunters being unable to collect a downed big game animal in a timely manner"; and 3) Impacts to Resources from Motorized Use [ndash] Concern: "Adding roads and camping corridors to the transportation system will adversely impact terrestrial and aquatic wildlife species, soil and water, and cultural resources".

Comments:

1. RDEIS - Purpose and Need for Action: The AWF supports the overall objectives of the RDEIS to comply with the Travel Management Rule by providing a system of roads, trails and areas designated for motor vehicle use (36 CFR 212) with the purpose to reduce impacts to biological, physical, and cultural resources within the ASNF. We also support the need to: 1) identify a system of roads that would be open to motor vehicle use; 2) identify a

system of motorized trails for vehicles 50 inches or less in width; 3) designate roads and trails open with specified distances from these designated routes for the purpose of dispersed camping and retrieval of big game legally harvested by permitted hunters; and 4) prohibit unrestricted cross country travel.

2. Proposed Alternatives; The RDEIS has significantly reduced the range of viable action alternatives (i.e., to only Alternative 2 [ndash] Proposed Action, and Alternative 3) from the 2010 ASNF [ndash] DEIS Public Motorized Travel Management Plan. There are significant differences between these two action alternatives in respect to key issues identified in the RDEIS (i.e., dispersed camping and big game retrieval) that the ASNF is trying to address. Alternative 2 [ndash] Proposed Action would provide approximately 359 miles of designated open roads on the ASNF for access for dispersed camping within 300 feet on either one or both sides of the road, and allow motorized big game retrieval (elk only) within a 1-mile distance off the designated road and motorized trail system (1.2 million acres). In stark contrast, Alternative 3 would only provide 79 miles of designated open roads for dispersed camping and would eliminate motorized vehicle access for any big game retrieval. Consequently, the AWF believes this very limited range in alternatives and their proposed actions is going to be problematic in meeting public needs and gaining public support.

3. Key Issue 1 - Dispersed Camping: The AWF supports the AGFD[rsquo]s needs for dispersed camping corridors along designated open roads within the ASNF that are well distributed within each Game Management Unit (GMU) within the ASNF (e.g., GMU 1, 3B, 3C, 4A, 4B, 27) to effectively distribute hunters to meet their harvest objectives and population management goals, reduce hunting pressure, and provide safe and quality experiences for the hunting public.

In reviewing the RDEIS Maps for Alternative 2 [ndash] Proposed Action that identifies open road and trail corridors that allow dispersed camping there are number of areas within several of the GMUs (e.g., GMU 1 - Milligan Valley, Loco Knoll, Thompson Park: GMU 4A [ndash] Tillman Draw; GMU 3B [ndash] Turkey Mountain, Elk Springs Draw) within both summer and wintering areas that are popular for hunting where open designated roads accessing these areas do not allow dispersed camping. These examples certainly do not fully represent all the popular or key areas along designated open road and trail corridors which the AGFD may deem important in meeting their objectives previously described. As stated above, The AWF fully supports the AGFD needs to have a network of well distributed dispersed camping opportunities in each GMU where possible. The AWF strongly recommends that the ASNF coordinate closely with the AGFD to further identify and refine the designated open road and trail corridors that would be made available for dispersed camping.

4. Key Issue 2 - Motorized Big Game Retrieval (MBGR): The AWF strongly supports the Arizona Game and Fish Department (AGFD) in their efforts to seek reasonable and effective motorized vehicle access for both the harvest and retrieval of big game animals in order to meet AGFD big game harvest objectives and population management goals, and enable hunters to efficiently retrieve harvested animals in a timely manner to prevent loss of meat and hides.

The AWF previously supported the proposed big game retrieval restrictions (i.e., motorized retrieval of elk, deer, and black bear within 1 mile of designated open roads and trails that were proposed in Alternative 2- Proposed Action of the ASNF 2010 DEIS- Public Motorized Travel Management Plan. AWF is now concerned that the RDEIS which now limits MBGR to elk only will negatively impact the AGFD in meeting its big game hunting management objectives for deer in particular along with black bear, and the AGFD objectives to enable hunters to retrieve these two legally harvested big game species in an efficient and timely manner. The AWF does acknowledge that the ASNF has been required for consistency with the other Arizona national forest travel management plan regulations to limit MBGR to elk only in this RDEIS. However, the RDEIS does not document any significant impacts of previous MBGR activities that included all big game species hunted within the ASNF as part of the justification for the new MBGR elk only restriction.

Page 174 of the RDEIS - Environmental Consequences section states that; "Typically, a single motorized pass

over an area has minimal effects to vegetation and soil resources. It is when there are repeated passes or when new routes are established that negative effects to vegetation and soils resources become more pronounced". Further on page 174 the document states that "Most motorized game retrieval also involves a single trip with a vehicle (typically an OHV). Webb and Wilshire (1983) found that after a single pass, annual plants on an OHV route remain intact, but most were destroyed after 10 passes. Perennial plants tend to be more robust, and therefore perennial plants are likely to also sustain one to two passes. Minimal impacts on vegetative ground cover and soil compaction are expected from motorized retrieval of big game".

The AWF believes considering the number of MBGR retrievals (i.e., predominantly single in/out trips) off designated system roads and trails that have occurred annually (i.e., for all big game species) in the past on the ASNF in comparison to the Forest/District wide non-commercial issued fuel wood cutting permits (See [ndash] Comment 5 below) that have allowed motorized travel off system roads and trails by the public that it is difficult to understand the new restrictions needed for MBGR proposed in the RDEIS in relation to evaluating environmental impacts in comparison between these two activities.

5. Fuel wood Harvest and Use of Motorized Vehicles: The AWF fully supports the activity of permitted non-commercial fuel wood cutting on the ASNF and use of motorized vehicles in gathering fuel wood by the public. However, this major motorized use activity on the ASNF in relation the proposed Travel Management plan and its environmental impacts are only casually mentioned (Page 270 [ndash] RDEIS) and are not evaluated at all within the RDEIS. Page 270 of the RDEIS states that "Permit records for the majority of ASNF non commercial fuel wood permits have allowed for travel off system roads to collect firewood. The AWF believes that because of the significant numbers of the public that participate in this activity that seek fuel wood via motorized vehicles off of system roads and trails that a significant number of the unauthorized roads on the ASNF have been and will continue to be created because of repeated trips to areas of desirable fuel wood through this permitted activity. Consequently, the AWF believes that the full assessment of environmental impacts related to this motorized use activity by the public in the RDEIS is totally incomplete and should be included in the same comprehensive analysis that the ASNF has completed for other related motorized activities (e.g., dispersed camping, MBGR) and their environmental impacts.

6. Key Issue 3 [ndash] Impacts to Resources from Motorized Use: The AWF commends the ASNF in providing overall accurate and comprehensive background information on existing conditions and science based information on potential environmental impacts of motorized vehicle use on wildlife and fish habitats (e.g.,, particularly Threatened, Endangered, and other Sensitive Species of Concern), water resources (streams, lakes, riparian areas), soil resources, and cultural resources.

The AWF believes, however, that to attain the objectives identified in the RDEIS [ndash] Purpose and Need for Action and to limit adverse impacts to terrestrial and aquatic species habitats, soil, water, and cultural resources the ASNF needs to fully address all potential public motorized use activities (i.e., non commercial fuel wood harvest and motorized vehicle use). This would enable the ASNF to better refine the Proposed Action Alternative for the Public Motorized Travel Management Plan.".

7. Wildlife Quiet Areas: The AWF strongly supports the continued management of current and potentially future designations of "Wildlife Quiet Areas" on the ASNF in relation to travel management objectives and their restrictions in prohibiting motorized vehicle use either yearlong or seasonally as identified in the respective management objectives for each area.

8. Travel Management Regulations: The AWF recommends that all travel management regulations, signing, and maps that are ultimately developed upon completion and implementation of the ASNF - Public Motorized Travel Management Plan should be clearly written and easy for the public to understand, consistent with other National Forests in Arizona, and enforceable. Designated roads and trails open for motorized vehicle use should be adequately signed and clearly marked to match motorized vehicle uses maps that are developed for the public

seeking information on what roads and trials on the ASNF are open for motorized vehicle use. Any roads that are to be closed and not open for public motorized vehicle use should be effectively closed if possible and clearly signed as closed to motorized vehicles. Finally, public education and outreach will be critical in developing public knowledge and acceptance of the "ASNF [ndash] Public Motorized Travel Management Plan" and in particular compliance with the plan in order to meet the plan[rsquo]s objectives.

The AWF appreciates the opportunity to provide the ASNF comments on the RDEIS [ndash] Public Motorized Travel Management Plan. We hope the comments we have provided are constructive and useful in the hopes of developing a Proposed Action Alternative that fully addresses all concerns related to public motorized vehicle use on the ASNF.